



# **CORPORATE COMPLIANCE POLICY**

**Effective 08/15/08**

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## **A TRADITION OF COMPLIANCE**

Since its foundation in 1894, employees of The Langdale Company, hereinafter referred to as "Company", and its affiliates have earned a reputation for high standards of honesty, integrity and fair dealings in ethical and lawful behavior. In 1955, Judge Harley Langdale restated several guiding principles, one of which was, "We want others to be able to say, it was good that we passed this way." This tradition has guided our company and employees through over a century of success. For the next 100 years and beyond, the values of integrity, honesty and goodwill must continue to be our guiding principles. Ethical and legal behavior at The Langdale Company is simply the right thing to do!

## **CORPORATE POLICY AND SUPPORT**

This Corporate Compliance Policy is intended to identify the appropriate behavior our company leaders and employees are expected to follow while conducting business. To administer this Policy, the position of Corporate Compliance Officer has been created. This position will be responsible for working with affiliate managers and employees to ensure that appropriate policies and procedures are in place. While The Langdale Company and its affiliates have ongoing and effective programs in place, the intent of this policy is to codify the existing policies and procedures and improve in any area where needed. We are confident that managers and employees will support this Policy and take all necessary steps to achieve proper implementation.

## **IMPLEMENTATION**

As in the past, managers and employees at each the affiliate will continue to be responsible for daily compliance with applicable ethics, policies, procedures, rules and regulations as outlined not only in this Policy but as outlined in each Affiliate handbook. Affiliate managers will ensure that each employee receives a copy of such programs and provide regular training.

## **MONITORING, AUDITING AND REPORTING**

At each affiliate, employee handbooks include an open door and/or complaint resolution procedure. This is a simple but effective process for resolving work-related concerns. Please follow this process for compliance Policy issues: first, talk with your immediate supervisor. If the issue is not resolved, raise your concern through the chain of command to the affiliate manager. If the concern still exists, present the matter to the Corporate Compliance Officer.

## **I. Statement of Policy**

It is the policy of The Langdale Company and its affiliates to maintain the highest ethical standards and comply with all applicable laws, rules, and regulations. We believe that adherence to this policy will aid in securing our continued success as well as earn and maintain the confidence of our employees, customers and the community in which we live.

All employees must comply with this Policy which includes a Code of Conduct. Any officer, director, or employee violating this Code is subject to disciplinary action, up to and including termination. All employees have a duty to report any and all suspected violations of the Code through the chain of command, ultimately to the Corporate Compliance Officer. Potential violators may include, but are not limited to, officers, directors, employees, agents, customers, subcontractors, suppliers, and general contractors. Employees in management positions are personally accountable for their own conduct. Each management employee is expected to inform those reporting to them about this Code of Conduct and take necessary steps to ensure compliance with this code. No employee has the authority to direct, participate in, approve, or tolerate any violation of this Policy. Any employee who has questions about the application of this Policy should proceed through the chain of command ultimately to the Corporate Compliance Officer. Whenever there may be a conflict between this Policy and existing affiliate policies, this Policy should prevail.

## **II. Code of Conduct**

### **A. Ethical Behavior**

It is the policy of The Langdale Company and its affiliates to maintain the highest ethical standards and comply with all applicable laws, rules, and regulations.

### **B. Equal Employment and Nondiscrimination**

As stated in all handbooks, The Langdale Company has consistently operated with a corporate policy of equal treatment for all persons without regard to age, race, color, sex, religion, national origin, disability, or veteran status. We make decisions on employment so as to further the principle of equal employment opportunity. All aspects of employment including advertising, recruiting, interviewing, testing, employment, training, transfer, compensation, promotion, termination, layoff and recall, employee benefits, social and recreation programs shall be administered without regard to age, race, color, sex, religion, national origin, disability or

veteran status. Our Company is committed to a working environment in which everyone is treated with respect, trust, honesty, fairness, and dignity.

Harassment as defined by federal and state law will not be tolerated.

### **C. Confidential Information**

You may have access to records and other personal information about customers and other employees. This includes proprietary information, trade secrets, and intellectual property to which The Langdale Company holds rights. You must not discuss this information with anyone else without proper authority.

Anything the Company does to design, produce and market its products that competitors cannot or do not do is treated as proprietary information, often called trade secrets. Any information that would damage our business if it became public knowledge or was disclosed to a competitor is considered a trade secret. This includes but is not limited to, information on the engineering, manufacturing, sales or financial aspects of our business. Violating this policy can be cause for disciplinary action.

You should never discuss proprietary information with any person from outside the Company or with other Company employees in any public place where it is possible you could be overheard. The obligation not to disclose proprietary information continues should you leave the Company for any reason. This is a legal obligation which we take seriously.

### **D. Environmental Compliance**

The Langdale Company is committed to full compliance with all federal, state and local environmental laws, regulations, standards, and guidelines. Not only is environmental compliance legally necessary, but it is also an important component of our obligation to the community and our good reputation. It is essential that each employee involved with such matters knows and complies with all applicable environmental laws, policies and guidelines. Any person who has reason to believe that there may have been violations of any aspect of our Company's Environmental Compliance policy shall report immediately to the Company's Compliance Officer. In addition to compliance with all environmental laws and guidelines, our Company is committed to utilizing energy and materials in a manner that will minimize impact on the environment.

## **E. Safety, Health, Drugs and Alcohol**

The Langdale Company considers employee safety and health as one of our highest priorities. Many of the job activities, products, and materials handled by our employees require strict adherence to safety policies.

Each employee must be aware of the safety program at their affiliate location that incorporates all applicable health and safety policies and procedures as set forth in the affiliate handbook. Supervisors are responsible for seeing that all reasonable safeguards and precautions are taken in the workplace to ensure compliance with the Company's policies and procedures. Any employee that has a safety related concern should report the concern through the chain of command, ultimately to the Corporate Compliance Officer.

Our Company expects all employees to report to work and perform his or her duties productively and safely. Drug and alcohol abuse by employees is regarded unsafe by creating an increased risk to the safety of themselves, their fellow employees, and the general public, and is therefore contrary to the Company's interests in maximizing its productivity. Drug and alcohol abuse, including prescription drug abuse, will not be tolerated, and the Company will take appropriate action to maintain compliance with this Policy. Anyone found to be using drugs or alcohol in the workplace will be subject to disciplinary action, up to and including termination.

## **F. Conflict of Interest**

Employees must avoid situations in which their personal interests could conflict with, or even appear to conflict with, the interests of The Langdale Company. Conflicts of interest may arise when an individual's position or responsibilities with the Company present an opportunity for personal gain or profit, separate and apart from that individual's earnings from the Company, or where the employee's interests are otherwise inconsistent with the interests of the Company. A conflict of interest may also arise in any number of situations, and it is impossible to describe each and every instance. As a general rule, if one believes that a situation may be a potential conflict of interest, he/she should report the concern through the chain of command, ultimately to the Corporate Compliance Officer.

## **G. Political Contributions**

No funds or assets of The Langdale Company shall be used for federal political campaign contributions. Even when state or local laws permit the use of such funds for political contributions, you must first obtain the approval of Company legal counsel. This does not restrict private, personal contributions.

## **H. Payments to Public Officials**

The Langdale Company's relationship with all government agencies and their officials in the United States and in any other country where we do business shall be such that full public disclosure thereof would not impugn the integrity or reputation of the Company or the public official. Payments to public officials, gifts or entertainment under illegal or improper circumstances are prohibited.

## **I. Obligation to Report Violations and Cooperation**

Any employee failing to report known or suspected violations of this Code or other unlawful or unethical behavior shall be subject to appropriate disciplinary action, up to and including termination.

## EMPLOYEE ACKNOWLEDGEMENT

\_\_\_\_\_  
Date

I specifically acknowledge that I have received and read The Langdale Company Corporate Compliance Policy and will abide by the principles expressed in said Policy. If I have any questions concerning what is meant by any of the Policy content, I will talk to my supervisor or general manager. Further, I acknowledge the following:

1. I understand that I will be subject to discipline, up to and including the termination of my employment, if I engage in conduct prohibited by this policy.

2. I understand the type of conduct and behavior that is prohibited by this policy.

3. I know how to and will immediately report violations of this policy to my immediate supervisor, General Manager and/or The Langdale Company's Corporate Compliance Officer.

I understand that this Policy may be changed from time to time at the sole discretion of The Langdale Company.

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Print Name