

Introductory paragraph examples:

#1 We pride ourselves on a culture of openness, trust and integrity. Therefore, we have established the following Ethics Policy.

Effective ethics is a team effort involving the participation and support of every employee. We will not tolerate any wrongdoing or impropriety at any time and management will take the appropriate measures and act quickly in addressing any issues or infractions of this policy.

We will promote a trustworthy and honest work atmosphere and we will reinforce the vision of these ethics within the organization.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and should not be submitted using this service.

#2 We have established this whistleblower hotline through Lighthouse Services, Inc. for a specific purpose. That purpose is to report fraud, unlawful, unethical and other types of improper behavior. A more complete description of the purpose of this policy is available in our ethics policy statement. This hotline is NOT a substitute for routine communications within our organization between associates and their supervisors and managers, particularly as to workplace duties. Likewise, it does not replace communications with HR staff about benefit issues or other job related issues. This Whistleblower hotline is an additional communication tool for specific types of situations and it is provided because we believe that it is a good business practice to do so.

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#3 We are committed to always doing the right thing. That is why we have an ethics and compliance program and why we have adopted the Code of Business Conduct and Ethics. The Code is specifically designed to be part of an effective program to prevent and detect violations of law and conduct. Employees are encouraged to discuss any questions related to this Code with their supervisor or with the CFO and/or General Counsel.

Employees who believe they are aware of a violation of the Code are expected and encouraged to report their concerns. Employees have many ways in which they can report a concern or incident related to this Code. They may discuss it with their manager, the Chief Operation Officer, the CFO and/or General Counsel. Employees may also contact Lighthouse Services, using this link. Such reports may be made confidentially and anonymously.

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#4 Our Code of Ethical Conduct summarizes expected behaviors for all employees in all business units. We will conduct business fairly, impartially, in an ethical manner and in complete compliance with the law. Our business conduct must be guided by the highest level of integrity when dealing with our customers, suppliers, local communities and employees. Employees will not engage in any activity that

could call into question the Company's honesty, impartiality or reputation. Employees must obey all applicable laws and regulations governing our operations anywhere we conduct business.

Each employee bears the responsibility to ask questions, seek proper guidance and report suspected violations of this Code of Conduct. We will not tolerate any retaliation against employees who raise genuine concerns. Such retaliation is cause for disciplinary action up to and including termination of employment.

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