

# Ethics policy



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**Building Ideas**

A.J. Manufacturing, Inc. • 1217 Oak Street • Bloomer, WI 54724  
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**1. Reporting of risks\***

A.J. Manufacturing, Inc. is committed to providing quality products and services that meet or exceed the expectations of our customers. Activities that threaten this commitment are expected to be reported.

**2. Promoting health and safety\***

The health and safety of A.J. Manufacturing, Inc.'s employees is of utmost importance. Our work processes and policies are designed to minimize risk. We all must routinely review and improve workplace conditions to ensure a safe and healthful workplace and must report unsafe working conditions anywhere they are observed to supervisors and management.

**3. Equal opportunity\***

We value and respect the diversity of our employees, officers, director, suppliers, customers, and communities. Our company is committed to providing equal opportunity in all of our employment and purchasing practices. Only in valuing diversity and committing to equal opportunity practices will we be able to fully utilize the human and business resources available to us in our pursuit of customer satisfaction.

We believe that new experiences on the job and involvement in work teams or special projects are valuable development opportunities. As part of our commitment to employee development, we provide training in technical and interpersonal skills. We are committed to providing a workplace that is free of harassment or any other behavior that diminishes a person's integrity and self esteem. Neither physical nor mental harassment or abuse will be tolerated.

**4. Freedom of association, work hours, and fair compensation\***

We respect and honor all laws pertaining to workers rights applicable in areas where we have operations. Employees are provided benefits and overtime compensation compliant with applicable laws. Employees' receive full details regarding deductions for taxes, benefits, etc.

**5. Protecting the environment\***

We respect the needs and concerns of the communities in which we live and work. This is exemplified in the company's long tradition of caring about the quality of the environment. Our products, services, and manufacturing methods reflect this concern and our belief that what is good for the environment is good for A.J. Manufacturing, Inc. Sound waste management and source reduction practices, recycling and energy conservation are legal, ethical, and business requirements. In meeting that commitment, we seek to improve and prevent pollution, minimize toxic and greenhouse gas emissions, and use or produce products that are environmentally friendly ensuring that land development and operations address community concerns and biodiversity preservation.

**6. Protecting employee privacy\***

A.J. Manufacturing, Inc. is committed to providing privacy protection of employee data maintained by the company. Employee data will be used for the sole purpose of supporting company operations and providing employee benefits. A.J. Manufacturing, Inc. will comply with all local data protection regulations.

**7. Protecting the Company's information\***

Protecting information about A.J. Manufacturing, Inc. products, activities, performance, or plans is critical to our company's competitive position and reputation. Good judgment is needed to determine what information can or cannot be disclosed to others. Should there be any question as to whether certain information is confidential, employees should consult their supervisor.

The use of confidential company information for the personal gain of an employee, officer, director, or anyone else is contrary to A.J. Manufacturing, Inc. policies and, in many cases, unlawful. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to the company or its customers, if disclosed.

**8. Avoiding conflicts of interest\***

The best interests of A.J. Manufacturing, Inc. are expected to be foremost in the minds of our employees, officers, and directors as they perform their duties. When we become employees of the company, and receive pay and benefits, we make this commitment.

It is wrong to seek any other economic gain by virtue of being an A.J. Manufacturing, Inc. employee, officer, or director. Giving or receiving anything of enough value to influence sound business judgment is prohibited. This also applies to family, friends, and business associates.

A.J. Manufacturing, Inc. trusts its employees, officers, and directors with information about company activities and with company funds and property. Use of any of these resources in a way that conflict with company interests is strictly prohibited. The employee's respective business group general manager must approve situations or arrangements that may conflict with company interests in advance.

We must also take care that our actions cannot be perceived as servicing other interests. While mutually beneficial relationships with customer and suppliers are encouraged, we should avoid situations that offer the potential for problems. Employees should also not work for a customer or a supplier. All these examples apply to involvement with our competitors as well.

**9. Proper use of Company funds\***

Employees are personally accountable for any form of company funds such as credit cards, tickets, cash, and checks. Those who authorize the use of funds must ensure that the company has received proper value in return. A.J. Manufacturing, Inc. may be obligated to notify appropriate civil authorities should funds be used for any improper or illegal purpose and will take appropriate disciplinary action in any event.

**10. Proper use of Company information and Company property\***

A.J. Manufacturing, Inc. trusts its employees with information about company activities and with company property. Use of these in a way that conflict with company interests, or in any manner that may reasonably be considered offensive or disruptive to another employee, is strictly prohibited.

**11. Appropriate use of e-mail, internet, and other computing resources\***

Electronic commerce, electronic mail, and other Internet related systems are intended to be used for company business. Use of computing resources to harass or offend others is prohibited.

**12. Integrity of recordkeeping/accounting\***

A.J. Manufacturing, Inc. documents a wide range of its activities. The integrity of these records is relied upon to make important business decisions. Records must provide reasonable detail accuracy and fairly reflect the company's transaction in accordance with law.

**13. Anti-Corruption political/governmental contributions**

No contribution of funds or services is to be made to or on behalf of any political organization or candidate by A.J. Manufacturing, Inc. without approval of the board of directors.

**14. Rule of law\***

Any employee of A.J. Manufacturing, Inc. or director involved in court or other similar proceedings arising out of his or her employment with, or service to, A.J. Manufacturing, Inc. shall abide by the rules of that forum, cooperate with the orders of the forum, and not in any way commit perjury or obstruction of justice.

**15. Defense security**

If A.J. Manufacturing, Inc. were to be involved in business requiring security clearances, strict care must be taken to comply with the laws on the protection and disclosure of classified information.

## 16. Antitrust

Planning or acting together with any competitor to fix prices or to agree about the nature, extent or means of competition in any market is against company policy and in violation of antitrust laws. Using illegal or unethical means to obtain competitive information or gain a competitive advantage over a competitor is prohibited.

## 17. International business

A.J. Manufacturing, Inc. participates in a global economy with goods and services delivered around the world. It is our policy to understand and comply with laws, related to international business, which can result in civil and criminal penalties for the company and individual employees, officers, and directors.

## 18. Responsibilities

Each employee, officer, and director of A.J. Manufacturing, Inc. is expected to carry out his or her work in accordance with the business standards of conduct of A.J. Manufacturing, Inc. Managers are expected to implement policies, programs, and procedures and ensure adequate communications as well as ensure internal controls are in place for their business unit to ensure compliance with the spirit and intent of applicable laws and policies.

The next higher level of management must be notified of any inconsistencies and must establish goals, targets and plans against which progress can be measured. Further, all employees are urged to direct any questions or concerns about the company's activities or these standards to their supervisors or the corporate human resources manager. This includes customer and supplier activities that may directly affect our operations or employees. Any employee who suspects that a violation of the Ethics Policy has occurred is obligated to report it, and such employees shall be protected from retaliation.

\* The Ethics Policy is not all encompassing, and questions about situations not discussed in the Ethics Policy should be addressed to the Human Resources Department or your Supervisor.

**Employees of A.J. Manufacturing, Inc. have read, signed, and are aware of these policies as detailed in the A.J. Manufacturing, Inc. Employee Manual. This published summary is intended to increase the awareness of our policies and intentions when interacting with suppliers, vendors, customers, coworkers, and our customers.**



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