

# VICTAULIC<sup>®</sup> CODE OF CONDUCT



## TABLE OF CONTENTS

- 01 A Message from Rick Bucher
- 02 Guiding Principles
- 03 About the Code
- 05 Health Safety and Environmental Protection
- 07 Anti-Corruption Laws
- 08 Improper Payments
- 09 Gifts and Entertainment Policy
- 10 Conflict of Interest
- 12 Fair and Open Competition/Antitrust
- 13 Trade Sanctions and Boycotts
- 14 Use of Agents, Consultants or Other Third Parties
- 16 Money Laundering Prevention
- 17 Vendor and Supplier Relationships
- 18 Fair Employment Practices
- 21 Accurate Books and Records
- 22 Intellectual Property
- 23 Protect Company Assets
- 24 Political Activity
- 25 External Communication
- 26 Awareness Line
- 28 Spanning the Globe

# A MESSAGE FROM RICK BUCHER

Whether you have been with our organization for many years or just a few months, I'd like to take this opportunity to thank you for your commitment to conduct business ethically and lawfully in all of the countries in which we operate.

Victaulic's reputation is rooted in all our employees acting fairly and honestly; and our future success depends on your vigilance to our Code of Conduct. One lapse in judgement by any one of us can have enormous consequences for the entire company.

The Code of Conduct serves as a clearly defined set of principles and laws to guide the way we do business on a global scale. It also helps us identify potential red flags that could lead to litigation or other sanctions against the company.

As a condition of employment, you have an obligation to act fairly and honestly. If you see something, say something. If you see something that makes you uncomfortable or you do not understand, please speak with your supervisor, Human Resources department, compliance officer, internal audit, or any member of the executive leadership team. If you feel more comfortable remaining anonymous, you can submit questions and concerns via our toll-free Awareness Line (**see pg. 26-27**) or log onto [www.victaulic.ethicspoint.com](http://www.victaulic.ethicspoint.com).

Every employee must make a personal commitment to follow the Victaulic Code of Conduct. So please, familiarize yourself with the Code as all employees will be asked to acknowledge they have read, understood, and complied.

I sincerely appreciate your dedication to our business integrity and performing your responsibilities with the utmost of accountability.



Rick A. Bucher  
President & CEO

# GUIDING PRINCIPLES

Always obey the laws and regulations that govern your business activities.

Demonstrate ethical conduct in everything you do.

Treat employees fairly and use employment practices based on equal opportunity for all employees. We are committed to providing safe and healthy working conditions and an atmosphere of open communications.

Deal fairly with suppliers, vendors and customers by treating everyone with respect and dignity.

Safeguard Victaulic assets – both physical and intangible – and make sure they are used to further the interests of Victaulic.

When communicating with others, both inside and outside Victaulic, use good judgment and consider how your actions reflect on Victaulic.

## Do the right thing

No one can tell you what is right or wrong in every situation.

If you are in doubt, ask yourself:

- Is this legal? Do I really know it is legal or should I ask my supervisor, my Regional Compliance Officer or the Legal department?
- Does it conflict with core Victaulic values?
- Am I involving all of the right people?
- How would I feel if I had to tell my family about my situation?
- If I act, will it be fair?
- How would I feel reading about my choice in a newspaper or explaining it in a court of law?

### And remember...

- If you know it is wrong, don't do it.
- If in doubt, ask.
- Keep asking until you get an answer.
- Do not ignore what you believe may be or is illegal or unethical conduct, report it.

# ABOUT THE CODE

## To whom does the code apply?

All directors, officers and employees of Victaulic, its affiliates and subsidiaries worldwide must adhere to the Code. Entities in which Victaulic owns more than 50% of the voting rights or has effective management control of the entity, are required to adopt and follow this Code.

Victaulic employees working with third parties, such as consultants, agents, sales representatives, distributors and independent contractors, must:

- Require parties to agree to comply with relevant aspects of the Code
- Provide parties with education and information about all compliance policy requirements
- Take action up to and including terminating a contract, after learning that a third party failed to abide by Victaulic compliance policies

## Responsibilities

### Company responsibilities

- Conduct business around the world in an ethical and lawful manner.
- Provide all employees with clear guidelines on business conduct.
- Implement the Code.
- Ensure thorough communication and training so all employees are aware of and understand the Code.
- Enforce the Code using appropriate incentives and disciplinary action.
- Implement early detection and reporting systems for any suspected criminal conduct or serious offenses.
- Assure that there will be no retaliation for reporting alleged violations of the Code.
- Require all employees to comply with the Code.
- Modify the Code as necessary.

### Supervisor responsibilities

- Set an example by conducting themselves and managing their departments in accordance with the Code.
- Periodically review the Code with employees.
- Direct any inquiries concerning the Code to a Regional Compliance Officer, Corporate Compliance or the Legal departments and ensure concerns have been addressed.
- Enforce the requirements of the Code.
- Maintain a work environment that encourages open communication, free from fear of reprisal concerning compliance with the Code.

# ABOUT THE CODE

## Employee responsibilities

- Understand the laws and regulations that apply to your job and follow them.
- Read, understand and follow the Code.
- Seek guidance from your supervisor, Regional Compliance Officer, Corporate Compliance or Legal departments regarding the proper way to act on behalf of Victaulic.
- Participate in compliance training.
- Promptly report suspected violations of the law or Code to your supervisor, Regional Compliance Officer, Corporate Compliance, Legal department or Victaulic's awareness line.
- If a concern you raise is not resolved, pursue the issue and elevate it through another channel.
- Cooperate in investigations related to the Code.

## Annual electronic Code of Conduct certification

Each year employees are required to acknowledge that they have read, understood, and complied with the Code, as well as recognize their continued obligations, which includes the obligation to report violations or suspected violations by completing an **annual electronic certification**. Employees are required to understand their obligations under the Code and acknowledge they have complied with its requirements. As part of this certification process, employees have the opportunity to request training or clarification or disclose a potential situation. Employees should include any activity that might in any way be deemed to constitute such a conflict and doubts should be resolved in the favor of disclosure so that an informed judgment can be made.

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## Getting help and reporting a suspected problem

Employees should always try to resolve or remedy the situation in a manner consistent with the Code. If possible, discuss your question or concern directly with the person involved, then contact your supervisor. If you believe your supervisor's response is not adequate contact one of the following alternatives:

- Your Human Resource professional
- Your Regional Compliance Officer:

**Asia Pacific:** Gordon Lu, Gordon.Lu@victaulic.com, +86 21 6170 1222 x333

**Canada:** Eric Van den Berghe, Eric.VandenBerghe@victaulic.com, +1 905 780 5584

**EMEA:** Paul Vergaert, Paul.Vergaert@victaulic.com, +329 3818889

**U.S.:** Darin Lueders, Darin.Lueders@victaulic.com, +1 610 923 3769

**Mexico, Caribbean, South America:** David Quevedo, David.Quevedo@victaulic.com, +52 614 429 1709

- Joe Savage, Chief Compliance Officer, +1 610 559 3494
  - Stephanie Hill, Vice President of Global Internal Audit and Compliance, +1 610 559 3324
  - Mark Van De Voorde, Chief Legal and Administrative Officer, +1 610 923 3190
  - The Victaulic Awareness Line (victaulic.ethicspoint.com) is a multi-lingual, toll-free service available 24 hours a day, seven days a week with an option to remain anonymous. Like most companies, Victaulic uses a third party to answer calls and transcribe reported information. Toll-free numbers and web reporting options are available on the Victaulic website under the **'Company'** tab.
  - 'Reach Rick' anonymously on Pipeline
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# HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

Victaulic is committed to environmental sustainability in the way we carry out our operations. Environmental sustainability at Victaulic means conducting our business in a manner that takes responsibility for our direct and indirect impact on the environment. This means that we will improve life-cycle energy use, dispose of waste responsibly, reduce pollutants and other byproducts our activities may generate, and promote sustainability with customers, associates, and suppliers. It requires that we seek continued improvement in reducing our environmental impact.

Victaulic complies with all federal, state, and local laws and regulations that apply to its operations, including those concerning occupational health, safety and environment anywhere in the world. Employees will make every reasonable effort to ensure that Victaulic products and places of business are safe for the public and its employees. A healthy and safe workplace and environment is not just the responsibility of the Company or management, it also demands the attention of every employee.

## Global standards and local policies

Safety regulations vary in different countries and states. Victaulic has established global safety standards, which in turn, support all safety policies, plans and programs necessary for each activity to comply with their local regulations. From these global safety standards, each activity creates the more detailed safety standards consistent with local regulations. It is each employee's responsibility to know and follow local safety policies.

## Drugs and alcohol in the workplace

Many employees work where the use or possession of alcohol or drugs, or reporting to the job under the influence of alcohol or drugs, would compromise their own and other employees' safety. For example, if an employee in a manufacturing facility is operating heavy machinery while on narcotic pain killers, even if the medication is legally prescribed, this could interfere with his or her ability to use the machinery safely. Victaulic has specific policies that outline rules on the use of drugs and alcohol in the workplace, including legally prescribed drugs like medical marijuana.

## Q&A

**Q:** A production employee witnesses the owners and other board members come onto the production floor without the proper personal protective equipment (PPE). He knew that this was a violation of our workplace safety policy but did not feel comfortable bringing the violation to the attention of these senior Company officials. What should he have done?

**A:** All employees have an obligation to watch out for other employees, company officials and visitors. Be polite, but always step forward and approach an individual who is not in compliance with our safety requirements. Many times, the offending individual subconsciously just failed to don his or her PPE.

When any safety violation is witnessed, a hazard noticed, or a fellow employee unwittingly placing himself in a hazardous situation, we expect our employees to intervene to prevent a safety incident or injury from occurring.

### Report:

- All workplace injuries
- Any risk to safety, security or health
- Any concerns about drugs and alcohol in the workplace

**Victaulic Awareness Line**  
Refer to the '**Company**' section of [Victaulic.com](http://Victaulic.com) for specific contact information.

# HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

## Q&A

**Q:** We recently received a new piece of machinery that was purchased to enhance our manufacturing efficiency. Upon installation by the supplier, it appears that this machine lacks the necessary safety equipment to safeguard its operators. Should I place this equipment into operation?

**A:** No, most large equipment purchases have been vetted for all necessary safeguards jointly by our Manufacturing Engineering and Safety group. In most cases of capital equipment purchases, the necessary safeguards are part of the scope of work contractually given to the manufacturer. Upon receipt and installation of such equipment, the appropriate Manufacturing Engineer, Safety and Production personnel conduct a thorough assessment that includes all safety guarding, development of operating procedures and training/certification of the assigned operators, BEFORE being placed into operation.

In the event equipment has been received that appears to be void of the necessary safeguards, immediately contact the Safety group to assess its safe working order before placing into the operation.

**Victaulic Awareness Line**  
Refer to the 'Company' section of [Victaulic.com](http://Victaulic.com) for specific contact information.

Use of illegal drugs is not permitted at any Victaulic facility or project site at any time. Alcohol may only be served at company functions, such as a company picnic or holiday party, in accordance with your local office practices, and only after obtaining necessary authorizations. Additionally, alcohol may be served as part of a routine business custom, such as a business dinner at a restaurant with Victaulic personnel and/or clients. Victaulic promotes responsible consumption and encourages all employees and clients to utilize safe transportation methods.

### Violence in the Workplace

Victaulic is committed to providing and maintaining a safe and healthy workplace for all our employees, customers and visitors compliant with legislative requirements. Our responsibility extends to ensuring that employees, customers and visitors are not placed at risk of violence or harm. Violence, threats of violence, harassment, threatening remarks or gestures, or other disruptive behavior in the workplace are unacceptable at all times. If you are involved in, or witness a situation that makes you feel uncomfortable, report it.

### Examples of health and safety violations:

Jim, a maintenance electrician, was working on electrical or powered equipment without following lock-out, tag-out safety procedures.

Evelyn, a machine operator, decided it was easier to get her job done by disabling the safety controls and removed protective guarding on the machining center she was operating.

Peter decided to not use his protective hood in the finishing operation because it was too hot that day in the factory, thereby exposing himself to potential eye injuries.

# ANTI-CORRUPTION LAWS

As a U.S. company with international affiliates and subsidiaries, Victaulic is subject to several specific laws governing improper payments:

**Foreign Corrupt Practices Act (FCPA) of 1977** – Prohibits corrupt payments to foreign government officials for obtaining or maintaining business. It requires companies to keep accurate books and records and ensure that adequate accounting and financial controls exist. Furthermore, the actions of a third party acting as an agent, distributor or consultant of Victaulic can expose the Company to liability under FCPA.

**The OECD Convention on Combating Bribery** – Each of the 44 signatory countries have enacted laws to prohibit bribery in international business dealings and mandate accounting changes to detect corrupt activities. Victaulic complies with the highest standards of U.S. and local anti-corruption laws and requires the same compliance from its vendors, suppliers, distributors and customers.

**U.S. Travel Act** – provides for federal prosecution of violators of commercial bribery and bribery of public officials. These laws apply to all Victaulic subsidiaries.

**Government Official Entertainment** – As part of normal business, Victaulic associates engage with state owned enterprises (“SOE”) and government officials (“GO”).

A pre-approval process has been developed and is required for all travel and entertainment expenses involving SOE’s and GO’s as follow:

- \*Gifts > \$75
- \*Entertainment/meals > \$75
- \*All travel expenses paid by Victaulic

## Anti-Corruption laws prohibit the corrupt payment or offer to pay:

- Anything of value
- To a foreign official, political party, party official or candidate
  - To influence any act to secure improper advantage
  - To obtain, maintain or direct business

These laws prohibit any corrupt payments knowing that funds will go to a foreign official even if routed through an agent or consultant.

Foreign officials include employees of commercial businesses where government control or involvement exists. It also includes any employee of the government, international organization, department agency or anyone acting in an official capacity. This applies to any public offices regardless of rank.

## Q&A

**Q:** What does “anything of value” mean?

**A:** This includes cash or its equivalent, tangible or intangible property, useful information, promise of future employment, campaign or lobbying payments, college or university scholarships, sports equipment or recreational vehicles, services at inflated prices or payment for sexually explicit entertainment. It can also include excessive business trips, meals, travel expenses and entertainment. Ask your supervisor or RCO if you have any questions.

# IMPROPER PAYMENTS

## Q&A

**Q:** Are there limits to what Victaulic can and cannot pay for when hosting members of a government agency?

**A:** Yes. It is appropriate for Victaulic to pay for the transportation, hotel and reasonable meal costs for the employees or government agencies or customers for the purpose of educating the individuals on our products and services. Expenses should be limited to the reasonable cost of traveling to and from Victaulic's location, hotel and meals during the days traveling to and from Victaulic's facilities and job sites. We should not pay for anything beyond this including travel and accommodations for side trips. No cash or anything of value should be paid to these officials. Victaulic has established a mandatory pre-approval process in Concur for entertainment plans with government officials.

Facilitation, or "grease", payments are common practice in many regions where Victaulic does business. They involve payment for expediting routine government actions such as obtaining permits and licenses, processing government paperwork or loading and unloading cargo. While common and routine in many regions, they are an express violation of Victaulic's Code, regardless of local custom.

Victaulic will compete on the basis of the merits of its products and services in the global market place. We will sell our products honestly and will not pursue any sale that requires us to act unlawfully or in violation of this standard.

It is a violation of the Code to give or receive

- Bribes
- Kickbacks
- Favors
- Personal services
- Gifts or entertainment greater than a modest value
- Promises of employment for family members

We cannot act or appear to be acting improperly in any of our business dealings. Our relationships with suppliers, distributors, direct customers and other parties, including engineering and contracting firms, as well as regulatory and licensing authorities, must be based on lawful, efficient and fair business practices. It is a violation of the Code if you accept a gift or a favor from a supplier, subcontractor, agent or consultant that benefits you personally as a Victaulic employee or a family member.

Even though in many parts of the world bribing government officials and business people is both expected and practiced making a gift of anything of value to foreign officials – public or private – is against the law and a threat to fair competition.

Any Victaulic employee paying or facilitating an improper payment or gift will be disciplined up to and including termination. In addition, the employee may be subject to personal liability and possible jail time, as provided under applicable laws.

### Examples of an improper payment violation:

You offer a contractor an iPad in exchange for some information that will give Victaulic a competitive advantage in winning a lucrative contract.

John, a Sales Engineer, offers to hire the relative of a contractor in exchange for being chosen as the winning bid on a large project.

# GIFTS AND ENTERTAINMENT POLICY

Victaulic is committed to the highest standard of integrity and ethical behavior. Business-focused customer entertainment and appropriate gifts are a normal course of Victaulic's business, and employees are encouraged to build relationships through these activities. Keep in mind that gifts or entertainment, whether given or received, do not necessarily create a conflict of interest, however an employee must be aware of the perception they create.

Gifts should never be given or accepted with the intention to influence, or appear to influence, a business decision. Gifts should never be given or accepted during or surrounding a contract negotiation. Also, a gift should never be solicited.

Acceptable gifts should be reasonable and appropriate:

- Non-monetary – No cash, gift cards, gift certificates
- Of a nominal value (\$75 or less from the same party within one year)
- Tickets to sports, music or cultural events
- Merchandise (gift baskets, wine, clothing, mugs, etc) – see Victaulic gear marketplace site for appropriate suggestions

You should clearly describe any gift and to whom it was provided to and their current relationship to Victaulic when seeking reimbursement on your expense report.

Invitations to all expense paid conferences (including lodging, travel, meals, etc) must be pre-approved by your regional compliance officer.

“Adult Entertaining” or any event involving nudity or lewd behavior is prohibited, including meals in these establishments.

If there is any question whether a gift or entertainment is acceptable or appropriate, you should ask your supervisor prior to giving a gift, and if necessary, contact our Compliance Department or our Legal Department to ensure it does not violate company policy.

**There is a separate policy which applies to giving or receiving of gifts and entertainment from government officials as referenced on page 7 of the Code of Conduct.**

## Q&A

**Q:** I have a client who just adopted a child. I would like to do something special. Can I provide something without violating our Code?

**A:** Yes. As long as the gift is given with no intention to influence a business decision and is of nominal value, acknowledging this life event is appropriate.

“But it would be impolite to refuse...” Employees may encounter situations where they feel social pressure to accept a gift that goes beyond the Corporation's financial threshold, and do not wish to offend the donor. In such case, Employees have to make a decision on the spur of the moment and must use their judgement. In practice, a polite refusal, by referring to the Corporation's Gifts, Entertainment and Hospitality Policy, may well be understood. If an Employee feels obliged to accept, they should, in any case, report the gift or benefit to their manager as soon as possible. Potential options include accepting the gift with your manager's approval, returning it with a polite note or offering it to charity.

**Victaulic Awareness Line**  
Refer to the **'Company'**  
section of [Victaulic.com](http://Victaulic.com) for  
specific contact information.

# CONFLICT OF INTEREST

## Q&A

**Q:** My father owns a controlling interest in a company that supplies materials to Victaulic. I was recently promoted, and in my new position I now have the ability to influence contracts with that same supplier. Is this a potential conflict of interest?

**A:** Yes. You need to disclose this relationship to the company and recuse yourself from any business dealings with or related to your father's company.

**Q:** I am thinking about getting a second job. Do I need to tell or get permission from anyone?

**A:** Victaulic does not prohibit you from getting a second job; however, your primary work obligation is to Victaulic. Any secondary employment must not interfere with your job at Victaulic. You may not use company time, equipment, supplies or computers to perform a secondary job. You must also ensure the secondary job does not cause a conflict of interest with Victaulic.

**Victaulic Awareness Line**  
Refer to the '**Company**' section of [Victaulic.com](http://Victaulic.com) for specific contact information.

Our directors, officers, employees and representatives must be loyal to Victaulic. A conflict of interest exists when your private interests improperly interfere in any way, or even appear to improperly interfere, with the interests of Victaulic.

Conflict of interests don't end when you leave the office. You must manage all business relationships that you may have with your Victaulic responsibilities in mind. Outside the office, work to avoid any situation that might lead to a conflict – or the appearance of a conflict – between yourself and your work at Victaulic.

Victaulic employees cannot be simultaneously employed in the selling, marketing or representation of other piping related products.

Most importantly, if you knowingly have a conflict of interest or believe there is a risk that something might be a conflict of interest, your obligation is to disclose it. It is the employee's responsibility to ensure they do not have a conflict. You can notify your supervisor, contact Human Resources, Regional Compliance Officer or the Legal department; and disclose it in our annual conflict of interest certification.

### Examples of a conflict of interest:

A senior executive is also on the board of directors of a company that supplies his employer with services. The executive should make the conflict known and excuse herself from conversations/votes relating to our products.

Jane, a hiring manager, finally gets permission to fill an open role she's had for months. Her sister-in-law is well qualified and looking for employment. To avoid delays Jane hires her sister-in-law without turning over the hiring responsibility to her Director.

I'm a manager in the shipping department, and my brother was just hired by a trucking company that handles a lot of shipments for our company. I should disclose this relationship to my supervisor to ensure there is no risk of a conflict and make sure we have an appropriate system of checks and balances in place.

# CONFLICT OF INTEREST

Typical examples of conflict of interest include:

- Ownership interest or investment (more than 5% of stock in a company) in any product or service supplier, customer, distributor or competitor.
- Consulting or employment relationships by a Victaulic employee or a close relative with any customer, supplier or competitor.
- Outside business activity (ownership, employment, or supplier/consultant relationship), which competes or could compete with any of the Company's businesses.
- Any outside activity that may interfere with an associate's ability to devote appropriate time and attention to company responsibilities.
- Selling or buying transactions with the Company (except any normal program of disposal of corporate property which is offered to employees generally.)
- Service on any board of directors of any customer, supplier, or competitor unless such board service has been disclosed to the Company.
- Supervising, reviewing or having influence on the job evaluation, pay or benefits of any member of your immediate family (includes person's spouse, parents, grandparents, children, grandchildren, siblings, mother and father-in-law, sons and daughters-in-law, and brothers and sisters-in-law), or close personal friend.
- Obtaining a loan from a customer, supplier or competitor of the Company other than a bank; and if you are an officer of the Company, from any bank with which the Company does business, unless a loan with similar terms is generally available to customers of the bank and is disclosed to the Company's Chief Compliance Officer.

## Q&A

**Q:** I am getting married soon and my future spouse works for the company. Is this a conflict of interest?

**A:** No. However our company policy says that a person may not supervise or have influence on a job evaluation for a member of their immediate family or a close friend.

### **Annual Electronic Certification**

Each year employees will be asked to acknowledge that they read, understood and complied with the code, including the obligation to report violations or suspected violations.

The employee should disclose any activity that might be deemed in any way to constitute such a conflict, and doubts should be resolved in favor of disclosure so that an informed judgment can be thereafter made.

**Victaulic Awareness Line**  
Refer to the '**Company**' section of [Victaulic.com](http://Victaulic.com) for specific contact information.

# FAIR AND OPEN COMPETITION / ANTITRUST

## Rules when dealing with competitors:

- **Never** discuss price or project/contract terms formally or informally
- **Never** discuss dividing territories or markets, setting margins or contract terms
- **Never** discuss production, sales capacity or volume
- **Never** discuss costs or margins
- **Never** discuss market shares
- **Clearly and openly refuse** to participate in any discussions that could be construed to concern anti-competitive practices
- **Never** attempt to do indirectly what you cannot do directly. Even casually explaining a topic with indirect comments or questions about project/contract terms or pricing is problematic and should be avoided

**Victaulic Awareness Line**  
Refer to the **'Company'**  
section of [Victaulic.com](http://Victaulic.com) for  
specific contact information.

Victaulic succeeds in the marketplace by providing superior products to our customers and by independently competing in the free market system. We believe that quality, price and other objective factors determine competitive success. Laws against unfair competition, also known as antitrust or fair trade laws, are designed to protect the competitive marketplace. Victaulic employees should never act in coordination with a competitor or in a way that restricts fair and open competition.

In the United States and many countries around the globe, these anti-trust and fair trade laws prohibit price fixing, dividing territories, agreeing to contract terms and other similar activities with competitors that negatively impact the consumer and are counter to free market principles. These laws vary depending on where you are doing business in the world. If you have any question that an action might violate fair trade laws, contact your supervisor, Regional Compliance Officer or the Legal department.

If you come into possession of any information about competitors that is marked confidential or proprietary, or it can be construed as anti-competitive, contact your supervisor or the Legal department immediately for advice on what to do.

### Examples of improper antitrust behavior:

At an industry conference, Phil, a Victaulic sales representative, is approached by a key competitor who suggests a mutually beneficial arrangement whereby Phil and he share and divide up customer lists, each agreeing to sell to its own group and not the other's.

After discussion and in coordination with our competitors, Victaulic decided to stop producing certain part numbers, limiting the supply of these items in the marketplace.

A sales representative agrees to set a minimum price for a few of our products with a competitor since it will be a win-win situation for both organizations.

# TRADE SANCTIONS AND BOYCOTTS

**Victaulic is considered a U.S. based and U.S. controlled group of companies, therefore exclusions and sanctions apply to all companies globally.**

## Trade Sanctions

Various countries, including the U.S. maintain lists of countries and individuals with which companies may not do business because of trade sanctions, embargoes or as specifically-listed denied parties. Victaulic utilizes these lists as well as third-party services to screen all potential customers before shipment. For an up-to-date list of these countries, end-users, individuals, etc. contact the Global Trade Compliance or Legal department.

## Boycotts

U.S. law prohibits U.S. companies from participating in boycott or restrictive trade practices against countries considered “friendly” to the United States and against companies that are “blacklisted” by other countries or firms. For example, some companies in the Middle East may seek to include language in contracts that prohibits Victaulic from doing work in Israel. U.S. law will not allow such language to be included or enforced in a contract.

## Export Controls

Export regulations impose restrictions on the transfer of certain articles and technology to foreign destinations or persons. Certain Victaulic products and technologies may be subject to export control restrictions.

## Deemed Exports

Transfers do not only include physical shipments, but also the release of technical data (e.g. through visual inspection of equipment and facilities, verbal exchanges or technical experience), the electronic transmission of technical data and software, and hand-carrying technical data, software, samples, parts, and professional equipment.

If you have any questions about whether a sale, shipment or transfer of a product or technology may be restricted, please contact your Regional Compliance Officer or Legal department.

## Customs Regulations

Importation of goods into countries are regulated by the Customs offices of those countries. In virtually all countries this includes complex regulations concerning the classification, valuation, country of origin and marking of the imported goods.

## CTPAT: Customs-Trade Partnership Against Terrorism

Victaulic has partnered with the U.S. government in their CTPAT program. CTPAT is a joint government-business initiative designed to build cooperative relationships that strengthen the overall supply chain and border security.

## About International Trade Compliance:

- International trade laws control the movement of products around the world. It is Victaulic’s policy that all employees will conduct global business in a compliant manner, respecting all applicable export, import, and trade compliance laws in every country Victaulic does business.

## About export controls:

- Be aware that the export of products to some countries is restricted or prohibited. Re-export of Victaulic goods is a concern that should be understood in all applicable transactions and that in all instances US rules apply. Knowing the final destination of Victaulic goods is imperative.
- Be aware of complex shipping or financial arrangements when exporting products.
- Ask for advice about any trade sanction or export restriction.

## CTPAT:

- Offers businesses an opportunity to play a major role in the war against terrorism and ensure a more secure supply chain for employees, suppliers and customers.

Failure to comply with export, import, and trade compliance laws could lead to criminal and civil penalties for Victaulic and/or for individual employees, significant business disruptions, and harm to Victaulic’s reputation.

## International trade compliance awareness

is everyone’s responsibility. If you encounter any situations that may be in violation of trade compliance policies, contact your Regional Compliance Officer, the Legal department or the Global Trade Compliance team at [Trade.Compliance@Victaulic.com](mailto:Trade.Compliance@Victaulic.com).

# USE OF AGENTS, CONSULTANTS OR OTHER THIRD PARTIES

## Q&A

**Q:** A Sales employee would like to add a new Distributor to their territory. What are the steps necessary to do this?

**A:** The employee should communicate with their Manager and Regional Compliance Officer since due diligence requirements for adding a new distributor vary depending on the region and anticipated level of sales volume. The process may include credit approval, investigation report by a contracted third party, ABAC certification, training and audit requirements.

**Q:** Victaulic is entering a country where at least partial government ownership is prevalent on projects our Sales team is interested in. The sales team would like to retain a consultant to assist in lobbying the key players to be specified for an upcoming project. What steps do they need to do before proceeding?

**A:** Consultants, lobbyists, and others retained to act on Victaulic's behalf are considered agents. Before retaining an agent, there is a diligence and approval process that includes final sign off by the CEO.

In many countries it is common practice to use agents, consultants, representatives, distributors or other third parties to arrange or broker deals with foreign governments or government entities (i.e. state mining companies) and private entities. These types of relationships have the potential to be problematic.

Accordingly, Victaulic has issued a Global Distribution & Agent Agreement Policy. This policy outlines the process for reviewing and approving proposed agency agreements and due diligence requirements.

It also outlines when a written Distributor agreement is required to support our non-exclusive, unilateral distribution strategy. The policy provides guidance on the Distributor appointment processes, sales to direct accounts and other business relationships for compliance with the Company's policy prohibiting improper payments.

### Agents

Before entering into substantive discussion with an agent candidate the country, regional or divisional supervisor and their respective financial professional must notify the Victaulic Compliance and Legal department and obtain approval to proceed. Due diligence requirements will be provided by the Legal department.

Victaulic country, regional or general managers and their respective finance professionals must complete a written report to ensure that the Company is dealing with individuals who comply with the laws prohibiting improper payments, who are reputable and do not have a history of unlawful behavior as well as who have the requisite experience and technical skills. The report will be submitted to the Compliance or Legal department and the CEO for approval prior to entering into an agency agreement.

The requirements of Victaulic's policy, including compliance with the FCPA and OECD convention, must be contractually accepted and complied with by the agent.

# USE OF AGENTS, CONSULTANTS OR OTHER THIRD PARTIES

All payments to agents require the approval of the Chief Financial Officer of Victaulic.

Although a third party may be called a consultant or representative, they may in fact be acting as Victaulic's agents. Any proposed agreements with consultants and representatives must be reviewed by the Legal department.

## Distributors

Working closely with distributors is an important part of Victaulic's global business. As part of its compliance and risk management program, Victaulic seeks to verify compliance with anti-corruption and money laundering laws in countries classified as high risk.

When necessary and appropriate, Victaulic will conduct third party investigations on those distributors considered high risk. Investigations will be updated on a periodic basis according to the most recent Distributor Risk Matrix. All investigations must be reviewed and approved by the Compliance and Legal departments.

In addition, The Distributor Risk Matrix may also require periodic certification of ongoing compliance with both the FCPA and applicable local anti-bribery laws of their country.

Victaulic may require a written distributor agreement to protect Victaulic and its IP, assets, and employees from legal or business risks.

## Third party brand usage

Occasionally, third parties may request to use Victaulic brands, logos or other trademark/copyrighted material. These requests should be directed to the Marketing or Legal departments.

## Q&A

**Q:** How do I know if a relationship is one of an independent distributor or an agent?

**A:** The answer is "it depends."

Key questions to be answered are:

- Do they sell other products besides Victaulic's?
- Do they sell other products or products for other customers?
- Do they inventory products?
- Do they take title and risk of loss to the product?

If the answer is "No" to any of these questions there is the potential that this is an agency relationship. Contact our Legal department for assistance.

**Victaulic Awareness Line**  
Refer to the '**Company**' section of [Victaulic.com](http://Victaulic.com) for specific contact information.

# MONEY LAUNDERING PREVENTION

## Q&A

**Q:** A European customer places an order and asks Victaulic to accept payment from a sister company. Should we proceed?

**A:** No. The customer's request should be a red flag and refused as this can be a way to conceal illegal activity. The situation should be reported to the Compliance and Legal departments for further investigation.

**IF YOU ENCOUNTER A WARNING SIGN of suspicious activity raise your concern with the Victaulic Legal or Compliance department and be sure to resolve your concern promptly before proceeding further with the transaction. Ensure the resolution is well documented.**

**Victaulic Awareness Line**  
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Persons involved in criminal activity, (e.g., fraud, bribery, terrorism and narcotics), may try to "launder" the money they derive from their crimes to hide or legitimize them. More than 100 countries now have laws against money laundering, that prohibit conducting transactions that involve proceeds of criminal activities. Another scenario of concern is the use of legitimate funds to finance terrorist activity – sometimes called 'reverse' money laundering.

Victaulic will comply with all anti-money laundering and anti-terrorism laws throughout the world and will conduct business only with reputable customers engaged in legitimate businesses, with funds derived from legitimate sources. Failure to detect customer relationships and transactions that place Victaulic at risk can severely damage Victaulic's integrity and reputation.

### Be alert to the following activities:

- **Requests to transfer money** to a third party or to the owner or an employee of the actual customer or to an unknown or unrecognized account. Verify the owner of the account prior to any transfer.
- **Payments** that appear to have no connection to the customer or are not evidenced by a valid invoice.
- **A customer, distributor or agent** who is reluctant to provide complete information, provides false or suspicious information, or attempts to avoid reporting or record keeping requirements.
- **Offers** to pay in cash.
- **Orders, purchases or payments** that are unusual or inconsistent with the customer's business.
- **Unusually complex payment arrangements** that have no real business purpose or unusually favorable payment terms.
- **Transactions involving locations** identified as tax havens or areas of known terrorist activity, narcotics trafficking or money laundering activity.
- **Transactions involving foreign shell or offshore banks** or non-bank financial intermediaries.

# VENDOR AND SUPPLIER RELATIONSHIPS

Victaulic's relationships with suppliers, vendors and subcontractors will be based on lawful, competitive and fair trade practices. It is Victaulic policy to purchase all equipment, supplies and services based on merit – the ability to meet our requirements for quality, price and delivery. All suppliers will be treated with integrity, fairness and without discrimination.

We will do business only with suppliers that comply with local laws and maintain compliance with regulatory, safety, traceability, and other applicable legal requirements. Victaulic reserves the right to terminate supplier relationships in instances where issues are found. Victaulic expects our suppliers to sign our Supplier Code-of-Conduct. Refusal to do so should raise concerns and be discussed with the Legal and Compliance departments.

Victaulic associates should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

We will safeguard Victaulic's confidential and proprietary information with a confidentiality agreement and safeguard any supplier-provided information protected by any confidentiality agreement.

As a global company, Victaulic seeks to negotiate formal contracts for ongoing services or large-scale purchases. The Global Logistics & Sourcing department or Legal department should be utilized as needed.

## **Background checks – suppliers/contractors/consultants**

We should apply the same standards in hiring contractors and consultants as we would with our employees: competent, professional, reputable and honest. Those employees involved with procurement decisions and the hiring of contractors or consultants should also conduct appropriate background checks of the consultants and contractors.

### **Examples of improper abuse in supplier relationship:**

Jack, a Category Manager, awarded a project to a company owned by his relative without disclosing the relationship, conducting the appropriate background checks, or supplier compliance.

Mary, a Buyer, accepted sporting event tickets from a supplier for awarding them additional business.

Hector, a Production Manager, selected a machine maintenance vendor in exchange for free tools for personal use.

## Q&A

**Q:** During a visit to a potential supplier I observed chemical waste being disposed of into a stream adjacent to the plant. This company has quoted competitive pricing and lead times. Can we pursue this supplier?

**A:** Dumping chemical waste into a stream is a hazard to the environment and is a violation of the Victaulic Supplier Code of Conduct. The supplier relationship should be terminated immediately and the situation reported to the Compliance and Legal departments.

Victaulic maintains zero tolerance for bribery and expects our suppliers and contractors to do the same. Bribery is directly or indirectly giving or promising anything of value to improperly influence the actions of a third party. Bribes may include money, gifts, travel expenses, hospitality, vacations, expenses or any direct or indirect benefit of consideration.

**Victaulic Awareness Line**  
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# FAIR EMPLOYMENT PRACTICES

## Q&A

**Q:** A Supply Chain Manger wants to use the services of a supplier in the Xinjiang region in China, which is known for its use of child labor. The Victaulic manager has been to the site and doesn't believe there is an issue. Can he move forward with the supplier?

**A:** The short answer is MAYBE. Because this is a risky region for human trafficking, slavery and child labor violations, appropriate due diligence must be performed before utilizing this supplier. The manager should involve Compliance to ensure proper procedures are followed.

**Victaulic Awareness Line**  
Refer to the **'Company'**  
section of [Victaulic.com](http://Victaulic.com) for  
specific contact information.

The laws in many countries that promote the fair treatment of workers, especially women and minorities, vary considerably. Because of this, Victaulic has established global standards to ensure that all employees around the world are treated with respect and fairness.

Employment decisions such as hiring, promotion, pay, termination, training opportunities and job assignments are made on the basis of qualifications, experience, competence and performance, and not because of a person's protected characteristics, which may include:

- Gender
- Pregnancy
- Age
- Color/ Race
- Disability
- Marital status
- National origin
- Religion
- Veteran status
- Other characteristics protected by law (affiliations, associations, beliefs and sexual orientation)

Victaulic is committed to human rights and the elimination of human trafficking and slavery. Victaulic recognizes that slavery and human trafficking can occur in many forms such as forced labor, child labor, domestic servitude, sex trafficking and workplace abuse. As such, Victaulic seeks to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations in our business globally. The full Anti-Human Trafficking and Slavery Statement can be found on the Victaulic intranet.

### **Workplace harassment**

Employees should work in a safe and professional atmosphere, where merit, competence, and trust are vital, and diversity is valued. We strive to create a work environment that is free from harassment by coworkers, supervisors, providers of goods and services, contractors and clients. Workplace harassment can occur in many forms including verbal, physical or visual. All forms of harassment share a common trait – the behavior may create an intimidating, offensive or demeaning environment.

Examples of potential sexual harassment can include but are not limited to: unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors and inappropriate comments about appearance.

# FAIR EMPLOYMENT PRACTICES

Other examples of harassment include: offensive comments, jokes or pictures related to race, religion, ethnicity, gender or age. Even materials and comments sent privately using company e-mail or voice-mail can be considered harassment or contribute to creating a hostile work environment. Offensive gestures, comments and communications have no place at Victaulic.

## Sexually explicit entertainment

Sometimes customers, suppliers and even employees have an interest in having business meals and entertainment that involves sexually explicit behavior. Regardless of local customs, Victaulic will not condone or fund sexually explicit entertainment.

## Protecting confidential employee information

Where relevant and permitted by applicable law, Victaulic may collect and process personal data and special category data as described under Victaulic's Internal Privacy Notice, which can be found on Pipeline. Victaulic is committed to maintaining a high-level of data protection and data security across our business. We expect all employees, and other members of staff, to familiarize themselves with the Victaulic Internal Privacy Policy, and to act in accordance with it in the performance of their duties and responsibilities when collecting and processing personal data and special category data.

### Example of unfair treatment violations:

Vivian, a customer service representative, is discharged after she explains that she needs to take a day off because she honors her religious observations.

## Q&A

**Q:** I am a supervisor and one of my employees informed me of inappropriate behavior of a sexual nature by a co-worker, but asked that I not report the harassment. Should I respect the wishes of my employee?

**A:** The manager should encourage the employee to report the incident to HR. If the employee chooses not to, the manager has a responsibility to report all potential harassment and should contact Human Resources so the Company can conduct a proper investigation.

**Victaulic Awareness Line**  
Refer to the '**Company**' section of [Victaulic.com](https://www.victaulic.com) for specific contact information.

# FAIR EMPLOYMENT PRACTICES

## **Options for flexible work include flextime and remote work:**

Flextime allows for flexibility in an employee's scheduled start and end time during a regular workday.

Remote work allows employees to work off-site or in a satellite location for all or part of their workweek.

## **Flexible work Guidelines**

Victaulic is committed to helping employees face the demands of juggling work, family, and personal obligations by offering flexible work arrangement options. The agreement and consideration of flexible work arrangements provide employees with increased flexibility with their work schedule while allowing Victaulic to maintain a productive work environment. Victaulic employees will be considered for flexible work arrangements on a case-by-case basis. Given the different types of positions and staffing levels, flexible work arrangements cannot always be accommodated.

The department director/manager is responsible for determining if an employee's request for flextime or remote work is a viable option for their respective departments.

Open communication is vital to the success of flexible work. An employee wishing to adjust or modify a flexible work arrangement must obtain approval from his or her director/manager. The expectation is an employee will provide the same level of commitment as if they were working in the office.

**Victaulic Awareness Line**  
Refer to the '**Company**' section of [Victaulic.com](http://Victaulic.com) for specific contact information.

# ACCURATE BOOKS AND RECORDS

Every Victaulic location is required to keep accurate books and records. Accurate, timely financial or operational records, as well as robust export controls provide the core information that is necessary to manage our business.

All company payments and other transactions must be properly authorized and accurately recorded in the financial statements that should be prepared in accordance with U.S. general accepted accounting principles and Victaulic accounting policies. Adequate internal controls must exist in all locations to ensure our financial information is complete and accurate.

No undisclosed or unrecorded company funds shall be established for any purpose, nor should company funds be placed in any personal or non-corporate account. All company assets must be properly safeguarded and should be periodically reconciled to financial records.

Company assets and property should not be intentionally damaged, nor taken or removed from company premises without proper authorization. Company assets do include electronic information in any format.

Financial information should not be provided to anyone outside of the Company without the approval of the President/CEO and CFO.

## **Examples of improper financial records and poor controls:**

Silvia, an accounting clerk, is asked by her supervisor to charge ordinary operating expenses against a special accounting reserve. When she objects stating this will misstate the earnings of the division, she is told this will impact everyone's annual performance bonus and if she doesn't "we will get someone who will." An employee should always feel comfortable elevating this type of scenario to a higher level of management or the Compliance department.

Fred and John work in Sales and decide to go to an expensive dinner. So it looks more reasonable, they split the bill between them to avoid questions from their manager.

No employee should be pressured to alter financial information or other data "to meet the numbers."

## **Fear of reporting "bad news"**

Delays in reporting bad news only makes problems worse and reduces the chance of solving or lessening the problem. All bad news, financial or otherwise, should travel very fast up the chain of command.

## **Holding back profits for future periods**

Holding back reserves, profits or other contingencies to protect profits in the future is unacceptable. Reserves, contingencies and profits should be analyzed and reported using proper generally accepted accounting practices and internal accounting policies.

**Victaulic Awareness Line**  
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# INTELLECTUAL PROPERTY

## PATENTS, TRADEMARKS, COPYRIGHTS, TRADE SECRETS, AND CONFIDENTIAL INFORMATION

### DO NOT:

- Accept confidential information belonging to a third party without first consulting with the Legal department.
- Execute any document relating to confidential information including non-disclosure agreements or similar provisions without prior approval.
- Discuss confidential information with customers, suppliers or competitors.
- Use a third party to develop new products without a written agreement approved by the Legal department.
- Disclose information concerning a new product before a patent application is filed or other safeguards have been considered.
- Create or use a new trademark before it is approved by the Legal department.
- Employ a new professional person without first securing a non-compete, confidentiality agreement and/or non-solicitation agreement as appropriate for your jurisdiction.

Victaulic is the world leader in the design, manufacture and distribution of mechanical piping products and has a long-standing commitment to the development of innovative products. Some of the most valuable Victaulic assets are its intellectual property including patents, trademarks, copyrights, trade secrets and confidential information.

Victaulic has an active international program for registering new patents, trademarks and copyrights. Questions or statements pertaining to patents, trademarks and copyrights, including questions or statements related to infringement, should be directed to Victaulic's Legal department. Consult with the Legal department concerning licensing of all patents, trademarks, trade secrets or confidential information before reviewing new product concepts from outside of Victaulic, before soliciting, accepting or using a third party's intellectual property and before disclosing Victaulic's intellectual property to third parties.

Victaulic trade secrets include new products or services under development, product designs and drawings, engineering procedures and instructions, manufacturing processes and formulas, names and addresses of customers, customer lists, pricing, project margins, budgets, as well as research and business strategies. Disclosure of this information can result in Victaulic losing its rights to these trade secrets. Disclosure is prohibited unless controlled by a confidentiality or license agreement approved by Victaulic's Legal department.

### Confidentiality agreements

All employees, consultants and contractors are required to sign a confidentiality agreement prior to the beginning of employment or engagement. If any customer, distributor, vendor or supplier asks you to execute a confidential agreement, please contact the Legal department.

### Use of copyright and/or trademark information

Employees should respect copyright or trademark information and images when creating written and/or oral communications, presentations and collateral viewed either internally or externally. It is important to understand and abide by any copyright rules or laws that apply to information, recordings, or photography, or other creative works that are being sourced from an external resource.

# PROTECTING COMPANY ASSETS

Protecting company assets against loss, theft and misuse is the responsibility of every employee. Victaulic assets consist of both tangible and intangible assets.

## Tangible assets

- Facilities
- Equipment
- Money
- Information Systems

## Intangible assets

- Intellectual property
- Invention disclosure
- Manufacturing know-how
- Trade secrets
- Computer programs

These assets must be used properly and as authorized by management. Any suspected theft, fraud or inappropriate use of the Company's assets should be reported to an employee's supervisor or your Regional Compliance Officer.

Assets should not be used for personal gain. However, we trust our employees with reasonable and permissible activities such as calling home to check on a sick child, emailing a spouse to stop at the bank on the way home or printing a simple grocery list on a company printer. These are reasonable and permissible because they are done within limits and work goals can still be accomplished.

It becomes a problem when employees abuse company assets for their personal use or gain. Taken too far, it can even be considered theft or fraud.

Use good judgment and ask your supervisor if you are not sure.

### Examples of improper use of company assets:

Using Company time and a printer at work to produce flyers for a local fundraiser.

Philip is starting a new business and makes phone calls to potential customers from the office.

## Computers and data security

Only Victaulic employees can access company systems. Third parties can access systems only if Victaulic IT has provided approval.

Company supplied computers, telephones and mobile devices are the property of Victaulic. All e-mail, voicemail, text messages and files stored on Victaulic systems and computer usage may be subject to review or monitoring as provided under Victaulic's Internal Privacy Notice.

Use of company computers, networks, e-mail or Internet resources to access, view, transmit archive or distribute racist, sexist, threatening or otherwise objectionable or illegal material is strictly prohibited.

Using company resources to violate laws or regulations of any nation is prohibited.

Employees should be vigilant in safeguarding systems and confidential information. Improper disclosure, corruption or loss of data can be costly to Victaulic.

All suspected security incidents should be reported immediately to an employee's supervisor or the Information Security team.

# POLITICAL ACTIVITY

**Examples of political contributions using company funds or resources which require Legal department consultation**

- Contributing to a local, state or federal political candidate.
- Purchasing tickets for a political fund raising event.
- Providing anything of value including meals, goods, services, travel accommodations or tickets for sporting and entertaining events.
- Loaning personnel or other corporate resources during working hours for political fund raising activities.
- Paying for political advertisements or other campaign expenses.

## Q&A

**Q:** I volunteered to work on a local congresswoman's campaign. I plan to use my work computer to solicit campaign contributions during my lunch hour each day. Is this acceptable?

**A:** No. No Victaulic resources should be used for non-work related activities, even outside of work hours

Lobbying and political activity are an important part of the democratic (political) process, but strict rules govern what corporations may and may not do in this arena. Victaulic is active in establishing good relationships with elected officials to enhance the Company's business environment. However, in nearly all the countries in which Victaulic operates, there are stringent legal restrictions on what a company can contribute, offer, promise or give to an elected official and their staff. As a result of these restrictions anyone wishing to work with a lobbyist or political consultant must first obtain approval from the Legal department.

Employees may not give, offer or authorize to offer company funds or other company assets (directly or indirectly) for political purposes without consulting the Legal department which will seek approval of the President and CEO.

A political contribution could be construed as a bribe if it is done, directly or indirectly, in exchange for an action by the government official. This can be direct, such as recommending Victaulic's selection on a procurement decision or other similar acts, or indirect, such as promising to include Victaulic in the list of approved – or even possible – vendors for a current or future project.

### Personal political activity

Victaulic encourages political activity by employees in support of candidates or parties of their choice. However, you cannot use company time, property or equipment for your own political activities. Personal participation in political activities is an employee's choice and must be totally voluntary.

# EXTERNAL COMMUNICATIONS

## News & Trade Media

All communication with and requests from news or trade media should be directed to the Corporate Communications department. Media requests might include insight into the following subjects:

- Workforce contract negotiations, management changes
- Mergers, acquisitions or significant business events
- New products, policies, processes or business strategies

## Social Media

The use of social and business networking sites by Victaulic employees is becoming more commonplace as these tools become major method of business and personal communication, networking, and research. Engagement in social media is acceptable when adhering to the following guidelines:

- Employees should not use these forums to reference proprietary business information.
- Victaulic employees are personally responsible for the content they publish on these forms of social media.
- If you identify yourself as a Victaulic employee on a given site, it is required that your profile and related content should be consistent with how Victaulic would expect you to present yourself to colleagues and clients.
- In any related comments or posting you must make it clear that you are speaking on your own behalf and not of Victaulic.
- Be mindful that what you publish will be public for a long time.

All communications and requests from bloggers and writers should be directed to the Corporate Communications department.

If you see a comment or posting of concern, you are encouraged to bring it to the attention of the Legal department and the Corporate Communications department.

## Examples of improper external communications:

Joe, a sales leader in Europe, posts on his LinkedIn profile that he is responsible for sales in a Victaulic vertical market and lists the actual Victaulic sales revenues of that vertical or lists his comments on Victaulic's approach to growth in that vertical. He should simply state his role and responsibility at Victaulic. Joe should not disclose financial or other proprietary information.

Janet, an administrative assistant in Forks Manufacturing, receives a phone call from a reporter who inquires about status of union contract terms. She replies, "I think that is true, but I will let you know," versus taking their information and passing along to the Corporate Communications department.

**Victaulic Awareness Line**  
Refer to the **'Company'**  
section of [Victaulic.com](http://Victaulic.com) for  
specific contact information.

# AWARENESS LINE

The purpose of the Awareness Line is to report Code of Conduct violations, suspected violations or to express concerns. The Awareness Line is confidential, easy to use and always available. The Awareness Line is operated by a third-party provider, Navex Global. Reports can be made online or by calling the toll-free number for your region. Both methods are available 24 hours a day, seven days a week. The system will assign you a report number and PIN. If you think of something else or additional events occur after you completed your initial report, you can call or log back in with your report number and PIN.

Employees are encouraged to first approach their manager or supervisor or a leader on the contact list noted on page 4 of the Code with concerns or reports. If that's not possible, you'll also find below toll-free numbers where available, instructions for toll calls in other regions, and a link to the online reporting tool. You can report anonymously, as permitted by local law, though identifying yourself simplifies follow-up.

Employees in some countries/regions are limited by local law in the violations categories to which they may file reports and/or the personal identifying information which they may provide using the reporting phone lines and online tool. If you are reporting from a country where local law prohibits anonymous reporting, be assured that Victaulic will preserve confidentiality throughout the follow-up process whenever possible.

## Online Reporting

[Victaulic.Ethicspoint.com](http://Victaulic.Ethicspoint.com)

## Toll Free Numbers

United States	1-866-842-2927
Australia (Optus)	AT&T Direct® Access (1-800-551-155) + 866-842-2927
Australia (Telstra)	AT&T Direct® Access (1-800-200-288) + 866-842-2927
Belgium	AT&T Direct® Access (0-800-100-10) + 866-842-2927
Brazil	0800-892-1872
Bulgaria	(00-800-0010) +866-842-2927
Canada	866-842-2927
China	4008822025
Czech Republic	800-144-409
Denmark	(800-100-10) +866-842-2927
Egypt (Cairo)	(2510-0200) +866-842-2927
Egypt (Outside Cairo)	(02-2510-0200) +866-842-2927
Finland	0800-9-13395
France	0800-90-9297
Germany	AT&T Direct® Access (0-800-225-5288) + 866-842-2927
India	AT&T Direct® Access (000-117) + 866-842-2927
Ireland (UIFN)	(00-800-222-55288) + 866-842-2927

# AWARENESS LINE

Israel (Barak)	(00-800-222-55288) + 866-842-2927
Israel (Bezeq)	(1-80-949-4949) + 866-842-2927
Israel (Golden Lines)	(1-80-922-2222) + 866-842-2927
Italy (includes San Marino, Vatican City)	AT&T Direct® Access (800-172-444) + 866-842-2927
Korea, Republic of South (DACOM)	AT&T Direct® Access (00-309-11) + 866-842-2927
Korea, Republic of South (ONSE)	AT&T Direct® Access (00-369-11) + 866-842-2927
Korea, Republic of South (Korea Telecom)	AT&T Direct® Access (00-729-11) + 866-842-2927
Korea, Republic of South (US Military Bases Dacom)	(550-2USA) + 866-842-2927
Korea, Republic of South (US Military Bases Korea Telecom)	(550-HOME) + 866-842-2927
Malaysia	(1-800-80-0011) +866-842-2927
Mexico	001-877-615-4831
Netherlands	(0800-022-9111) + 866-842-2927
Norway	(800-190-11) + 866-842-2927
Norway (US Military Bases)	(800-199-11) + 866-842-2927
Poland	0-0-800-111-1983
Qatar	00-800-100-554
Romania	(0808-03-4288) + 866-842-2927
South Africa	(0-800-99-0123) + 866-842-2927
Spain	AT&T Direct® Access (900-99-0011) + 866-842-2927
Sweden	AT&T Direct® Access (020-799-111) + 866-842-2927
Switzerland	(0-800-890011) + 866-842-2927
Taiwan	AT&T Direct® Access (00-801-102-880) + 866-842- 2927
Turkey	(0811-288-0001) + 866-842-2927
United Arab Emirates	(8000-021) + 866-842-2927
United Arab Emirates (Military USO and cellular)	(8000-061) + 866-842-2927
United Arab Emirates (du)	(8000-555-66) + 866-842-2927
United Kingdom & Northern Ireland	(0-800-89-0011) + 866-842-2927

Don't see your country listed? You can access the toll-free Awareness Line by first dialing the correct AT&T Direct® Access number found through the link below, then calling the United States number 866-842-2927

<http://www.business.att.com/bt/access.jsp> (Select the first letter of your country name to find the appropriate country and AT&T Direct® Access number)

# SPANNING THE GLOBE WITH FACILITIES AND SALES SUPPORT SERVICING MORE THAN 120 COUNTRIES

## KEY

★ Headquarters





### U.S./World Headquarters

4901 Kesslersville Road  
Easton, PA 18040 USA

[victauliclocations.com](http://victauliclocations.com)

### EMEA

Prijkelstraat 36  
9810 Nazareth, Belgium

### Asia Pacific

Unit 808, Building B  
Hongwell International Plaza  
No.1602 West Zhongshan Road  
Shanghai, China 200235



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