

## St. Paul Foundry

### Code of Ethics and Conduct Policy

Our guiding philosophy is that we do the right thing. When in doubt we err on the side of caution and conservatism. We treat others as they want to be treated. This is asking more than the golden rule, because to treat others as they want to be treated we need to understand the other person or organization. It requires taking the time to understand them and their differences from us.

These are our rules. They are not suggestions. We expect each of our employees to follow them. They are a condition of employment.

1. We know the internal policies and external laws and regulations that govern us. We adhere to them. If we disagree with them we work to change them through official channels.
2. We always do things in the safest possible way in our plant, our product and our environment.
  - a. We send our employees home to their families in the same condition as when they arrived for work.
  - b. Lives can depend on our castings being made correctly. Our products are made to the customer's specifications. We know the specifications. If the specifications need to be changed we do so through official channels.
  - c. We are good stewards of our environment. We follow the laws and rules that govern us. We seek to continually reduce our use of resources and to minimize the wastes from our processes.
3. We are honest to ourselves, our employees, our customers, our suppliers, the government and all others that we interact with as representatives of SPBA.
  - a. Our word is our honor. We say what we mean. We do what we say.
  - b. Every communication between us and another party has the potential to be a legal bond. We are cognizant of this at all times.
4. We are fair.
  - a. We give excellent value for a fair price.
  - b. We treat everyone the same regardless of our differences.
5. We conduct our business according to established standards.
  - a. Our accounting is done in accordance with GAAP, FASB and the US tax code.
  - b. Certifications are done in compliance with established standards for testing.
  - c. Our quality registrations are based on procedures to which we are audited. We always follow those procedures or cause them to be changed through official channels.
  - d. Every casting in our plant has an established set of instructions to manufacture it. Those instructions are maintained in a master database and printed on JNs. The database is kept accurate. Employees are expected to read the JN and make the part to the instructions. If the instructions are wrong work should not progress until the instructions are changed.
  - e. We have an employee handbook. It will be maintained accurately. Every word in it is policy.

6. We are loyal.
  - a. We are loyal to SPBA which provides a living for us and our families. We do not take bribes or kickbacks. We do not conduct non SPBA related work on company time. We do not engage in activities that could create even the appearance of a conflict of interest.
  - b. We are loyal to our customers and suppliers who have worked in partnership with us to develop knowledge and mutual advantage.
  - c. We are loyal to our values.
7. We are courageous.
  - a. If we see something that we know is wrong we point it out.
  - b. If we make a mistake we admit it.
  - c. We do the right thing.
  - d. We continuously strive to be better today than we were yesterday. Tomorrow we will be even better.