

# **COLUMBIA MACHINE, INC.**

## **CODE OF BUSINESS CONDUCT AND ETHICS**





Integrity is one of Columbia's strongest core values, and we strive for conducting business with the highest standards of ethics. We are committed to providing a safe and positive work environment where individuals can continually improve their skills and capabilities, adding value to our business and enhancing our employee's work experience. When Columbia Machine is continuously improving its overall performance, through the combined efforts of its employees, the company can be competitively and financially successful.

If you observe any business conduct contrary to the above, we would hope that you would feel comfortable contacting your Supervisor, Human Resources, or any member of the Executive Management Team to report any such conduct.

Examples of such behavior include, but are not limited to:

- Discrimination or Harassment
- Violation of Policy
- Substance Abuse
- Theft or Embezzlement
- Kickbacks or Bribes
- Violence or Threats of Violence

The overall well-being of our employees is important to us. Success is achieved when we all commit to shared goals that are rewarding to both the individual and the company. Thank you for your assistance in this valuable process and maintaining Columbia's high ethical standards.

Sincerely,

Richard T. Goode  
CEO

## Our Core Values

Our Values have helped create a unique culture at Columbia that sets us apart and defines who we are as an organization. We are proud of our culture and its focus on these key priorities:

**Innovation** - Innovation is a core value that applies to all activities, including the products and services we produce and processes we use. A continuous process of innovation requires an environment that reinforces desired behavior and encourages intelligent risk taking. Our culture is dissatisfied with the status quo, aware of the outside world, and is committed to lifelong learning, and continuous improvement.

**Quality and Value** - Quality and value apply to all products and services that we create and deliver. We will strive to continuously improve supplier and customer relationships by providing superior products and services. Understanding customer needs and applying conscientious participation of all cross functional individuals and teams are essential.

**Growth/Fair Return** - Profits are essential to Columbia in order to provide for business growth and individual growth. We will strive to achieve a fair return to shareholders in order to support business reinvestment in the future of Columbia Machine and continue as a viable employer and thriving competitive enterprise.

**Fair Dealings/Teamwork** - Employee performance standards and expectations are communicated with feedback and evaluation. Communication between supervisors and employees will provide recognition of good performance and provide developmental opportunities. Policies, practices and consequences are to be followed and accepted. Employees are provided a common understanding of company goals.

**Trust/Honesty/Integrity/Respect** - We expect every interaction and transaction, whether internal or external, at all levels to meet the highest standards of trust, honesty, integrity, and respect.

## Columbia's Pillars of Success

### Safety

TRIR and Injuries at Customer Plants

### Net Promoter Score (NPS)

"How likely is it that you would recommend Columbia to a friend or colleague?" Create more Promoters, Loyal enthusiasts

### Return on Invested Capital (ROIC).

Communicating our strategy and making investments and decisions that generate future cash flows.

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# Columbia's Business Ethics and Values

## Our Commitment to Integrity

As a family-owned and operated business, we have a unique character and culture. We take pride in operating our business with integrity and understand we are a part of a larger community. We must challenge ourselves every day to make sure that, as a company, and as individuals, we make choices that will stand the test of time and that we will be proud of.

As individuals, our personal integrity means that others can trust and respect us and know that we will be honest, fair and forthright. As a company, integrity means we will honor our obligations and be a reliable business partner and trusted neighbor always. Integrity means always protecting our company's assets: its people, properties and products.

All Columbia's employees are expected to use good judgment, and our Code is not, and in fact cannot be, a substitute for good judgment. Rather, our Code is designed to help when we have questions about what to do in specific situations. It is a summary of how we will do business in accordance with our policies and in compliance with laws and regulations. By following our Code, we will ensure that our business activities and decisions are consistent, not only with laws and regulations, but also with the highest standards of ethics.

It is impossible to anticipate every question or situation that might arise. For this reason, we will continue to:

- Rely on one another to help sort through difficult situations.
- Use good judgment.
- Seek help when needed.

If you have questions or concerns, talk to your co-workers, your supervisor, any member of management or use one of the resources listed in our Code.

## Making the Right Choice – Guidelines for Ethical Decision-Making

Making the right decision is not always easy. There will be times when you may be under pressure or unsure of what to do. Always remember that co-workers and management are available to help and there are other resources to turn to including those listed in our Code. When faced with a difficult decision, it may help to ask yourself these questions:

- Is it the right thing to do?
- Is it legal?
- Does it comply with our Code, policies and procedures?
- Have I considered all of the consequences?
- Does it expose Columbia to any unacceptable risks?
- Will I be comfortable telling others about my decision?
- Would my supervisor or management agree with my decision?

If these types of questions raise any doubts about whether your decision is ethical, legal or in compliance with Columbia policies, you should contact your supervisor, any member of the Human Resources Team, CFO, or the CEO.

## Who Must Follow Our Code

Our Code applies to directors, officers and employees of Columbia Machine, Inc. and its subsidiaries and affiliates. Acknowledging and agreeing to follow our Code is a non-negotiable condition of employment for everyone at Columbia. Further, certain business partners serve as an extension of Columbia and their conduct can have an impact on our reputation. For this reason, they are expected to follow the spirit of our Code and any applicable contractual provisions when working on behalf of Columbia.

If you are in a position to supervise our business partners, you are responsible for ensuring that they understand our ethics and compliance standards. We expect all our contractors and their employees to act in a way that is consistent with our Code. We will take the appropriate measures where we believe they have not met our high standards or their contractual obligations.



## **Employee Responsibilities**

- Act in a professional, safe, and ethical manner that is consistent with our standards.
- Be familiar with the information contained in our Code as well as applicable laws and company policies.
- Know the policies that pertain to your job responsibilities.
- Promptly report concerns about actions that may be inconsistent with our Code, policies, or laws and regulations.
- Remember: pressure or demands due to business conditions are never an excuse for violating the law or our Code.
- Share the Company's commitment to mutual respect for all coworkers, customers, vendors, and other third parties by demonstrating common courtesy, civility and professionalism.

## **Columbia's Leadership Responsibilities**

Columbia's Leadership Team has additional responsibilities to ensure that we meet the highest standards of ethics and compliance.

- Lead by example. Through your actions demonstrate the importance of ethics and compliance.
- Be available for employees who have questions or wish to report a possible violation.
- Create an environment where individuals feel comfortable speaking up.
- Listen and respond to concerns when they are raised.
- Make sure that no one who speaks up suffers retaliation.
- Help others understand the requirements of our Code, policies and applicable laws.
- Do not apply inappropriate pressure on others or lead others to think that 'bending the rules' or 'cutting corners' is acceptable.
- Be consistent when enforcing our standards and holding people accountable for their behavior at work.
- Managers must ensure that our Code and our policies are enforced.

## **Asking Questions and Raising Concerns**

If you see something wrong, or suspect any illegal or unethical behavior, if you think something violates our policies, or if you have a questions about what to do, speak up and ask for help. You have a responsibility to speak up, and you should never assume that someone else has reported the problem.

It is always best to talk with your supervisor or manager first, but if you can't, or would rather talk with someone else, you have several options:

- First: You may talk with any other supervisor or member of management
- Second: You may contact any member of the Human Resources Team, CFO, or CEO.
- Third: If you prefer, at any time you can:

Contact the CONFIDENTIAL THIRD PARTY managed "Ethics Hotline" This can be accessed anonymously in two ways:

**Internet:** <http://columbiemachine.ethicspoint.com>

**Telephone:** 844-627-6884. International telephone access information is provided on the website.

- The hotline process will be managed only by the CFO and CEO of Columbia.
- Immediately report any urgent problems (i.e., safety or health hazards) locally in order to obtain the fastest response.

**Our Non-Retaliation Policy**

Columbia does not tolerate retaliation against an employee for raising concerns or reporting possible misconduct in good faith, or for assisting in the investigation of possible misconduct. Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated. If you think that you or someone you know has suffered retaliation, contact any of the sources listed above.

**Accountability and Discipline**

Reports of possible misconduct will be taken seriously and investigated promptly and thoroughly. When a violation of our Code, policies or the law occurs, appropriate disciplinary action will be taken, up to and including termination of employment. Certain actions may also result in legal proceedings, penalties or criminal prosecution. In addition, any employee who directs or approves of any conduct that is in violation of our Code, or who has knowledge of such conduct and does not immediately report it, will be subject to disciplinary action, up to and including termination.

**Waivers and Exceptions**

Waivers of our Code will be granted only in exceptional circumstances and must be approved by the CEO.

# Our Responsibilities to One Another

We seek to invest in the development of our people to secure our future. This means embracing many different depths of experience, personalities, and needs (family needs, religious needs, health needs, and more) to build positive work relationships and experiences so our employees can thrive.

## **Diversity and Non-Discrimination**

We should always treat others with dignity and respect and value what each of us has to contribute. Different backgrounds and points of view help promote innovation and success. At Columbia, we work to maintain a diverse workforce where personnel are hired, retained, compensated, disciplined, and promoted solely on the basis of their contribution to Columbia and their performance.

Columbia is committed to providing equal employment and career opportunities without discrimination or harassment wherever we do business. We offer equal employment opportunities to all qualified individuals without regard to race, religion, color, sex, age, national origin, creed, marital status, disability, veteran, current or future military status, gender identity, gender expression or sexual orientation, and the presence of any sensory, mental or physical handicap. Columbia will not tolerate discrimination or harassment based on these or any other legally protected categories.

If you see discrimination or believe you are being discriminated against, report the situation to the Human Resources Department or any of the other resources listed in our Code.

## **Harassment-Free Workplace**

Everyone works best when they feel safe. For this reason, we do not tolerate any form of intimidation, bullying or harassment. This includes any form of sexual harassment.

- Help create a work environment free of all forms of harassment.
- Understand that inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated.
- Remember that harassment does not have to occur in the workplace or involve a Columbia employee to violate our Code or the law.

All instances of harassment should be reported to the Human Resources Department, and/or any member of Columbia's Management Team. Sexual harassment and illegal discrimination may subject both you and Columbia to civil liabilities. If you are found to have engaged in either, you will be subject to disciplinary action, up to and including termination.

## **Employee Privacy**

We respect the privacy and the confidentiality of personal employee information. Personal information will only be used when it's needed to operate effectively or to comply with the law.

Columbia does not take an interest in what you do outside of work – unless it affects your work performance, Columbia's reputation, or our business interests.

## **Safe and Healthy Work Environment**

We all need to be aware of safety and health risks as we go about our jobs. Each of us has the responsibility to work in a way that helps ensure the safety and health of our co-workers, business partners, and visitors to our facility.

- Report any accident or unsafe working conditions to the Safety Director so immediate action can be taken. Never assume that someone else has reported a risk or concern.
- Threats, intimidation, or violence towards anyone at work, including co-workers, is not tolerated.



# Our Responsibilities to Our Customers and Business Partners

## **Honest and Ethical Conduct and Fair Dealing**

Always deal honestly and ethically with our suppliers, customers, and competitors. Do not take unfair advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior, or any other unfair practice.

In short, treat others as we would like to be treated.

- Always act to protect and enhance the assets and reputation of Columbia.
- Treat others fairly and honestly.
- Be responsive to all reasonable requests from our customers, suppliers and business partners, but never follow a request to do something that you regard as unlawful, unsafe or contrary to our Code.
- Promise what you can deliver and deliver on what you promise.

## **Supplier and Customer Relations**

Our customers, suppliers and business partners are essential to our ability to do business and meet our high standards and our customers' expectations.

We work with others who share similar values and our commitments to customer service, ethics and compliance.

- Help our suppliers and business partners understand our expectations and act in a way that is consistent with our Code and applicable policies.
- Report any suspicions that a business partner may not be meeting our standards or their contractual obligations.

## **Conflicts of Interest**

Situations of actual or potential conflict of interest are to be avoided by all employees. A conflict of interest may exist when an employee's personal activities or financial affairs adversely influence an employee's judgment or performance of duties at the Company and/or compromise the interests of the Company. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or a relative as a result of this Company's business dealing.

An employee involved in any of the types of situations described in this policy should immediately and fully disclose the relevant circumstances to their immediate supervisor for a determination as to whether a potential or actual conflict exists. If an actual or potential conflict is determined, the employer may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts will result in disciplinary action including possible termination.

# Our Responsibilities in the Marketplace

## **Communicating with the Public**

When we share information with the public, it is important we do so carefully and that we are consistent and speak with one, clear voice.

- If you are involved in preparing documents for public communications or filings with government agencies, always strive to be clear, objective, fair, accurate, complete, and timely.
- All contacts with the media must be referred to and approved by the CEO.

## **Using Social Media**

The use of social media has grown significantly in recent years. If used appropriately, social media may be an efficient means of sharing information. However, if not done properly, it may expose Columbia to additional risk. Please read and follow our Social Media Policy.

# Our Responsibilities as Corporate Citizens

## **Compliance with Laws**

We conduct our business in accordance with all applicable laws. Including all of the federal, state and local laws and regulations that apply to us in our Code would be impossible. This is why each of us must be responsible, use good judgment and common sense, ask when in doubt, and always keep up-to-date on the laws and regulations that apply to our responsibilities.

For questions about whether a particular situation may involve illegal conduct, or about specific laws that may apply to your work, consult the Human Resources Department, CFO, or the CEO.

# General Information

Our Code covers many of the ethics and compliance topics that we are likely to face in our work, but no code can cover every possible situation. That is why it is important to remember that you have other resources in addition to our Code you can use to help you make good decisions.

- The most important resource is you. Rely on your experience and good judgment. But remember, in order to make informed decisions, you must know and understand the policies, standards, laws and regulations – especially those that apply to your job.
- In any situation if you're not sure what to do, count on your colleagues and supervisors. Don't be afraid to ask questions and get help.
- Use the Business Ethics and Values Hotline to ask questions or report concerns.

Contact:

The Human Resources Department, or use the CONFIDENTIAL THIRD PARTY managed "Ethics Hotline." This can be accessed anonymously in two ways:

## **Ethics Hotline:**

**Internet:** <http://columbiamachine.ethicspoint.com>

**Telephone:** 844-627-6884. International telephone access information is provided on the website.

The hotline process will be managed by only the CFO and CEO of Columbia.

## What to expect when you use the Hotline

- The Ethics Hotline is available 24 hours, seven days a week.
- Trained specialists from an independent third party will answer your call, document your concerns and forward a written report to the Company for further investigation.
- When you use the Ethics Hotline by phone or by internet (<http://columbiamachine.ethicspoint.com>), you may choose to remain anonymous where allowed by local law. All reports will be treated seriously and appropriately, and any concerns raised are kept confidential to the fullest extent possible under the circumstances.
- After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation.

## Contact Information

Human Resources Manager: 360-694-1501 ext. 366

CFO: 360-694-1501 ext. 393

CEO: 360-694-1501 ext. 790