



Code of Business Conduct

Live Our Values Every Day.

Our Code of Business Conduct serves to guide our actions consistent with Our Values. The Code helps you do the right thing and play by the rules wherever we operate around the world.



INTRODUCTION

What is the Columbus McKinnon Code of Business Conduct?

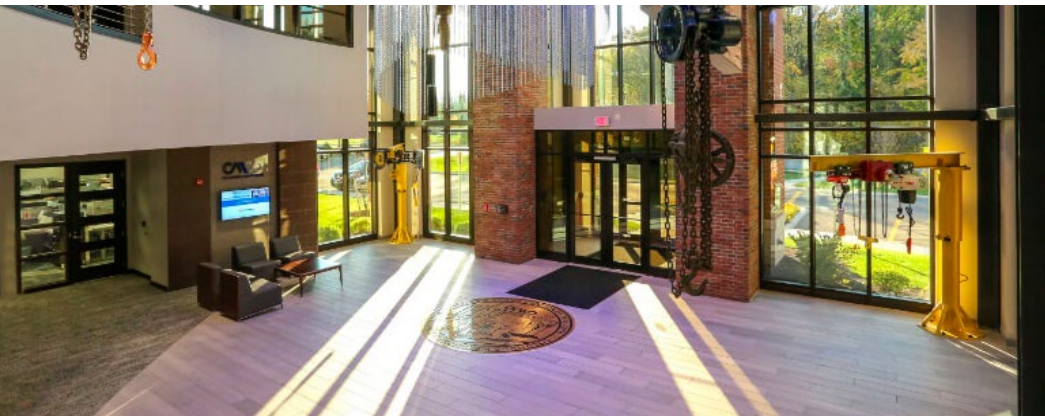
The values and principles spelled out in *Our Mission, Vision and Values* serve as our compass; the Columbus McKinnon Corporation Code of Business Conduct (“Code”) is the road map that helps us stay on course with those values. The Code sets basic requirements for business conduct and serves as a foundation for our Company policies, procedures and guidelines, all of which provide additional guidance on expected behaviors.

Why do we have a Code, and why must we follow it?

To continue to operate and maintain our reputation as a Company that puts first the needs of the people we serve around the world, we must each learn, understand and comply with our Code. Complying with our Code is about creating an environment where we can do our best work and be proud of the work we do, the challenges we overcome and the successes we achieve – all because we do these things fairly, legally and with integrity.

What are your responsibilities?

Whenever we become aware of a violation of the Code, Company policy or the law, we will act to address the problem and prevent future occurrences. Depending on the circumstances, corrective and preventive steps might include training, counseling and disciplinary actions up to and including termination of employment. You have a responsibility to speak up when you are in a situation or are aware of a situation that you believe may violate or lead to a violation of the Code, Company policy or the law. The Code provides guidance on how to bring attention to a matter of concern.



A MESSAGE FROM ALAN S. KORMAN AND MARY C. O'CONNOR

Dear CMCO Colleagues,

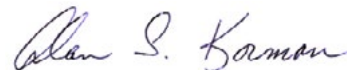
As we continue to grow and come together as an organization, one thing that will never change is our commitment to operating with the highest ethical standards.

We have a clear vision, strategy and guiding values which capture who we are and what we stand for as an organization. In addition, our Code of Business Conduct sets forth the standards by which we conduct our operations. It covers a range of subjects, from respect in the workplace, to use of corporate assets, gifts and conflicts of interest, and protecting confidential information. It applies to all employees and sets expectations that our standards must be followed in all job-related activities, regardless of business pressures.

We ask that you read our Code carefully and follow it, along with our policies and the law. If you have any questions, the Code includes links and information about other resources that are available. CMCO leaders have additional responsibilities to lead by example and to help others understand and meet their ethics and compliance responsibilities. Remember that open communication and feedback are key to our success. If you have any questions or concerns, it is important that you speak up.

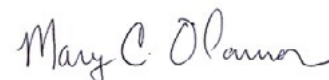
We are truly fortunate to have outstanding employees throughout our organization. We know we can count on each of you to use good judgment and to keep in mind *Our Mission, Vision and Values*. Working together, we will not only continue to grow, but we will always be proud of how we achieve our success. Thank you for your continued support and hard work.

Sincerely,



Alan S. Korman

Vice President, General Counsel & Secretary



Mary C. O'Connor

Assistant General Counsel & Chief Ethics and Compliance Officer



OUR MISSION, VISION AND VALUES



Our Mission

We provide expert, professional-grade solutions and products, building the trust of customers by solving their high-value problems.



Our Vision

To become the leading industrial technology company in safe and productive motion control.



Our Values

We are raising expectations by *Living Our Values* through our daily behaviors.

- **Connect safety to everything we do.**
Take personal responsibility. Care for our people. Build products that everyone can trust.
- **Be easy to do business with.**
Focus on the customer. Listen. Simplify.
- **Deliver on your commitments.**
Aim for greatness. Do your best. Hold yourself accountable.
- **Think differently.**
Be proactive with new ideas. Ask questions. Be part of the solution.
- **Win as a team.**
Work together. Respect each other. Celebrate success.
- **Act with integrity.**
Do the right thing. Extend trust. Appreciate differences.

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LIVING OUR VALUES

We are raising expectations by *Living Our Values* through our daily behaviors.

IN THIS SECTION:

- Know Our Code
- Understanding Your Responsibilities
- Asking Questions and Reporting Concerns
- Cooperating with Investigations

Our Values define the character of Columbus McKinnon. While all equally important, we cannot be successful unless we are first focused on Acting with Integrity. In order to do the right thing, it is critical to understand what is expected of you as a representative of the Company.

KNOW OUR CODE

Welcome to our Code of Business Conduct (“Code”).

From time to time all of us face difficult business decisions. At CMCO, when these situations occur, we are fortunate to have resources to turn to for help. We can rely on one another, on our supervisors and on technical experts throughout the Company. But just as important, we also have *Our Mission, Vision and Values* as well as this Code which provide a foundation for our decisions.

Using Our Code

Our Code sets our expectations and serves as a guide to help apply *Our Mission, Vision and Values* to situations we may face. It also summarizes our policies and the laws and regulations we must follow.

Our Code applies everywhere we do business. If there is a conflict between the requirements of the Code and the laws, customs or practices in a particular area, talk with your immediate supervisor or the Chief Ethics and Compliance Officer to determine the best course of action.

Of course, the Code cannot cover every situation. If you need additional information or guidance, you can contact any of the resources listed throughout the Code. If you do not find the information you’re looking for in the Code, talk to your immediate supervisor or contact any of the resources listed in this Code.

In addition, each department or business, wherever located, may adopt further compliance materials which apply specifically to the employees in that particular department or business.

Who Must Follow the Code?

All employees of Columbus McKinnon Corporation (“CMCO” or the “Company”) must follow our Code as well as related policies and procedures. This includes officers, directors and employees at every level.

We also expect anyone acting on our behalf, including contractors and consultants, to conduct themselves in a manner consistent with our Code, the law, applicable policies and their contractual obligations.



UNDERSTANDING YOUR RESPONSIBILITIES

All of us have a role to play in meeting our standards for ethics and compliance and protecting CMCO's reputation.

Doing our part means we have the following responsibilities:

- Know and follow this Code, policies, laws and regulations – especially those that apply to your job.
- When in doubt, speak up, ask questions and report concerns.
- Work as a team and treat others with respect.
- Cooperate and be truthful when responding to an investigation, inspection or audit.
- Complete all required ethics and compliance training.

If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead – but misconduct affects all of us. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates our Code may face corrective action, up to and including termination of employment with CMCO.



One More Thing ...

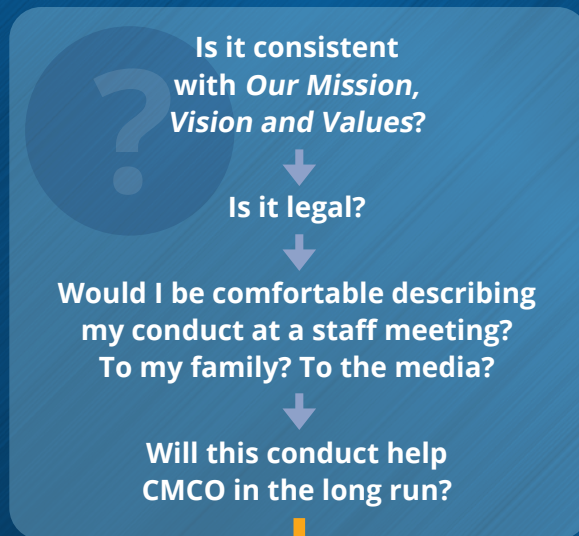
We value your feedback. If you have suggestions for ways to enhance our Code, policies or our resources to better address a particular issue you have encountered, bring them forward to the Chief Ethics and Compliance Officer. Promoting a more ethical organization is a responsibility we all share.



UNDERSTANDING YOUR RESPONSIBILITIES (CONT.)

Making Good Decisions

At times, we all need help to determine the best solution to a problem. If you are faced with a difficult decision, ask yourself the following questions:



If the answer to all of these questions is "Yes," then do it. If "No," or you're not sure, stop and ask for help.

Managers Have Additional Responsibilities

If you are a CMCO leader or supervisor, you have additional responsibilities:

- Be an example for others to follow.
- Set clear expectations for your work groups and help employees understand their responsibilities.
- Be approachable. Maintain an environment where others can comfortably ask questions or raise concerns.
- Be consistent when enforcing our standards and holding people accountable.
- Never ask or pressure anyone to do something you would feel uncomfortable doing or are prohibited from doing yourself.
- If you supervise third parties, make sure that they understand our expectations and their obligations.

The Warning Signs of a Questionable Decision

When decisions are being made, listen for the following comments, they could signal that the decision is inconsistent with our ethics and compliance standards:

- "Don't worry about it. No one will find out."
- "We need to do whatever it takes."
- "We need to keep this decision to ourselves – no one else needs to know."
- "That's just how we do business here."
- "Everyone else is doing it this way."
- "This is the way we have always done it and nothing bad has happened."

ASKING QUESTIONS AND REPORTING CONCERNS

If you have a question or if you know or suspect that there has been a violation of our Code, policies or the law, you need to speak up. When you ask questions or report concerns, you are giving us an opportunity to address problems early and make any needed improvements.

Remember: An issue cannot be addressed unless it is brought to someone’s attention.

Getting Help

In most cases, your immediate supervisor should be your first point of contact. He or she is likely to be in the best position to understand your concern or question and take the appropriate action.

However, if you’re uncomfortable speaking with your immediate supervisor, your immediate supervisor is unable to answer your question, or if you have already shared a concern and believe it’s not being addressed, you have these additional options:

- Talk to another supervisor, manager or your department head.
- Contact your local Human Resources manager or the Vice President of Human Resources. Contact information is available on the HR Intranet Page.
- Contact the General Counsel or the Chief Ethics and Compliance Officer. Contact information is available on the Legal Intranet Page.
- Use the Ethics Hotline:
 - Through the internet using the [EthicsPoint Website](#).
 - Call, using the toll-free number posted at each CMCO location.

Confidentiality and Anonymity

What to Expect When You Use the Ethics Hotline

The Ethics Hotline is a confidential way to report possible violations of the Code or any policies, laws, rules or regulations. You may use the Hotline 24 hours a day, seven days a week. The Hotline call center is staffed by third-party ethics and compliance specialists. When you contact them, the operator will listen, ask questions if necessary, and then write a summary report. The summary will then be provided to CMCO for assessment and further action.

You can call anonymously, where allowed by local law. It is important to provide as many details as possible (e.g., who, what, when, where). Since CMCO may need additional information, you will be assigned a report number and asked to call back at a later date to answer any follow-up questions.



COOPERATING WITH INVESTIGATIONS

Any information provided through the Ethics Hotline or through any other reporting channel will be treated confidentially to the extent permitted by law. We may be required to report certain types of activities.

If an investigation is needed, it will be conducted by the Legal Department or Human Resources and may also involve other CMCO personnel or external resources.

Violations of this Code, our policies, laws or regulations can result in serious consequences for you and for CMCO. Anyone violating this Code will be subject to appropriate disciplinary action, including possible termination of employment. In addition, the Company will take other corrective action to help prevent any further occurrence.

CMCO will cooperate fully with appropriate authorities when they investigate conduct that appears to be a crime and may, in addition to disciplinary actions, seek restitution from individuals for harm to our interests.

No Retaliation

We will not tolerate retaliation against anyone who reports a concern in good faith. We take claims of retaliation seriously; they will be investigated, and if substantiated, retaliators will be disciplined up to and including termination.



MAKING ETHICAL DECISIONS

QUESTION: Three months ago, I called the Ethics Hotline anonymously. I was concerned that my supervisor was giving preferential treatment to some employees at the expense of others. It was investigated, and I understand some action was taken.

Since then my boss and others have stopped speaking to me and copying me on important communications, and I am worried this will affect my performance. I feel that my colleagues know I made the report and are retaliating. Is it retaliation? What should I do?

ANSWER: This could be a case of retaliation. Contact Human Resources or use any of the other resources listed in the Code. A thorough investigation will take place to find out what has led to your colleagues' behavior. If the investigation determines that they are retaliating because of your report, appropriate action will be taken.

COOPERATING WITH INVESTIGATIONS (CONT.)

Reporting in “Good Faith”

Making a report in “good faith” means that you provide all the information you have and report honestly, regardless of whether the investigation of your report uncovers any actual misconduct.

If you believe you have been retaliated against, you should contact your immediate supervisor, Human Resources, the Legal Department or the Ethics Hotline.



MAKING ETHICAL DECISIONS

QUESTION: What if I only suspect something is wrong, should I report it?

ANSWER: You should always speak up if you have a good faith concern that something is wrong. Your manager or others will have the resources to further look into the issue and determine what steps, if any, need to be taken.

QUESTION: What if my supervisor or other managers are involved in a violation? Won't they get the report?

ANSWER: You have the option of making a report to the Ethics Hotline without identifying yourself. However, in order to investigate a complaint, an implicated individual may receive a summary of the allegation(s) so that they can defend themselves. As a matter of procedure, reports of misconduct, the identity of the reporter and witnesses are kept confidential to the extent legally possible.

WE RESPECT ONE ANOTHER

Win as a team. Work together, respect each other. Celebrate success.

IN THIS SECTION:

- Safety First
- Human Rights and Lawful Employment Practices
- Employee Diversity and Respect in the Workplace
- Harassment
- Protecting Private Information

Respect and safety are a common language and our employees deserve a workplace where they know they will have both without exception. We want every person to be able to go home each night to their families safely. Safety is both the responsibility of the Company management as well as an active daily choice by each employee. Therefore, our standards have to be unwaveringly high when it comes to creating a respectful and safe workplace.

SAFETY FIRST

Nothing is more important to us than providing a safe work environment. We promote a culture of safety, because our people are our greatest asset. We are committed to eliminating all accidents, injuries and job-related illnesses and addressing all safety risks.

We will always maintain the highest safety standards and comply with all applicable policies and laws, including applicable job safety procedures.

All levels of management have responsibility for continually promoting and encouraging safe work practices. Accident prevention is a critical operating responsibility and demands the same management and control that is given to other aspects of improving efficiency in operations. Department heads and supervisors, therefore, are directly responsible for continuous efforts toward preventing accidents.

Your Responsibilities

- Remember that safety is everyone’s responsibility.
- Place protection of health and safety first, no matter how urgent the job.
- Comply with applicable regulations, requirements and job procedures.
- Never tolerate others who ignore or bypass safety standards.
- Report all incidents and near misses.
- Report any health and safety issue that you believe has not been appropriately resolved even if it means raising it with other resources listed in this Code.
- Help make sure that those who work with you – other employees, contractors and third parties – act consistently with our safety standards.



MAKING ETHICAL DECISIONS

QUESTION: I’ve noticed some practices in my area that don’t seem safe. Who can I speak to? I’m new here and don’t want to be considered a troublemaker.

ANSWER: It is your obligation to discuss your concerns with your Environmental Health and Safety manager or your supervisor. There may be very good reasons for the practices, but it is important to remember that at CMCO, raising a concern about safety is never viewed as causing trouble – it is being responsible. If your concerns are not resolved by notifying your supervisor, feel free to contact any of the other resources listed in this Code.

SAFETY FIRST (CONT.)



DO's AND DON'Ts

Do

- Stay alert to what is going on around you.
- Follow all job safety procedures.
- Wear and use all appropriate, required or provided safety equipment and protective devices.
- Stay up-to-date about your emergency response plan and equipment such as emergency exits and first aid kits.
- Complete all required safety training.
- Tell your supervisor about any unsafe conditions, occupational illnesses or injuries, damaged property or equipment.

Don't

- Operate machinery without proper training.
- Ignore health, safety, security or environmental risks.
- Tolerate violence, threats or sabotage.
- Work under the influence of alcohol, controlled substances, illegal drugs or medications.
- Carry unauthorized weapons on our property.

For More Information

Safety Incident Management Policy

Drug and Alcohol Abuse Policy

CMCO Environmental, Health and Safety (EHS) Intranet Page



MAKING ETHICAL DECISIONS

QUESTION: My supervisor asked me to operate a crane. I don't feel I've been adequately trained on the machine, and I'm worried that I might cause damage.

ANSWER: Let your supervisor know that you are uncomfortable operating the machinery. He may not be aware of your situation. As a general rule, you should never operate machinery unless you are properly trained and are sure that you can do so safely.

QUESTION: Are contractors and business partners expected to follow the same Environmental, Health and Safety policies and procedures as employees?

ANSWER: Absolutely. Supervisors are responsible for ensuring that contractors and business partners understand that they must comply with our high standards, as well as additional requirements the Company may impose.

HUMAN RIGHTS AND LAWFUL EMPLOYMENT PRACTICES

We are committed to respecting the human rights and dignity of everyone. We will not tolerate abuse of human rights in our operations or in our supply chain.

We are committed to adhering to all applicable employment and labor laws everywhere we operate. We comply with all applicable laws and international standards pertaining to fair employment practices, forced and compulsory labor, child labor, employment discrimination and human trafficking including the [Universal Declaration of Human Rights](#), the [International Labour Organization’s core standards](#) and the [UK Modern Slavery Act](#).

Our commitment to lawful employment practices specifically includes the following:

Child Labor – The Company will not employ underage individuals as defined by applicable child labor laws.

Forced Labor – The Company does not support the use of forced labor or involuntary prison labor. Recruiting and selection activities are conducted in compliance with applicable law and applicable collective bargaining obligations.

Wages and Work Hours – The Company is committed to meeting all minimum wage obligations and collective bargaining agreements regarding maximum hours, minimum wage, overtime work and the payment of overtime compensation.

Your Responsibilities

- If you have any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners, report your concerns to your supervisor or use any of the reporting channels in this Code.
- Remember that respect for human dignity begins with our daily interactions with one another and with our business partners. It also includes promoting diversity and inclusion, accommodating disabilities and doing our part to protect the rights and dignity of everyone with whom we do business.



MAKING ETHICAL DECISIONS

QUESTION: When I was visiting a new supplier, I noticed employees that were working there that seemed underage. When I asked about it, I didn’t get a clear answer. What are my next steps?

ANSWER: You did the right thing first to be on the lookout for human rights abuses and second to raise the issue with our supplier. The next step is to report the incident to the Global Sourcing Director or the Chief Procurement Officer. We are committed to human rights and to the elimination of human rights abuses including child labor.

EMPLOYEE DIVERSITY AND RESPECT IN THE WORKPLACE

We work best when we work together as a team, when we treat each other with respect and value the unique contributions of others.

Employee Diversity

We are committed to fostering and promoting an inclusive and diverse work environment. We value the contributions of every employee. A diversity of colleagues means a diversity of ideas and a more stimulating work experience. It also means our workforce reflects the diverse set of customers we serve and helps us to address – and respond to – a wide variety of needs and opportunities. In addition our Board of Directors has adopted the Rooney Rule for director hiring.

We are committed to maintain a safe, productive, diverse, professional and secure work environment in which all individuals are treated with humanity, respect and dignity.

Equal Opportunity

We are committed to equal employment opportunity and prohibit any type of discrimination including discrimination based on origins, gender, lifestyle, sexual orientation, age, family status or pregnancy, genetic characteristics, ethnic group, nation or race, political opinions, union or pro-bono activities, religious beliefs, physical appearance, family name, health or handicap.

We comply with all applicable employment, labor and immigration requirements, and we expect all CMCO personnel and applicants for employment to cooperate with our compliance efforts.



MAKING ETHICAL DECISIONS

QUESTION: Can I make a judgment call about who to interview given what I know about the job requirements and the candidate’s family situation? I believe that a vacancy in my team would not be suitable for a single parent, as it involves a lot of travel. This is not about prejudice, but practicality. Am I obliged to interview single parent candidates out of courtesy?

ANSWER: You are obliged to interview all candidates whose qualifications meet the requirements of the job – not on the basis of personal opinion or judgments about a candidate’s personal life. Making assumptions like this violates our standards and may even be against the law. Just as important, failing to interview suitably qualified candidates risks missing out on appointing the best person for the job. At CMCO, equal opportunity means equal opportunity for everyone.

EMPLOYEE DIVERSITY AND RESPECT IN THE WORKPLACE (CONT.)

Your Responsibilities

- Treat others with respect – your coworkers, our customers and everyone we interact with at work.
- Always do your part to help create a positive work environment where everyone can contribute and fully utilize their talents.
- Keep an open mind to new ideas and listen in order to better understand and learn from different points of view.
- Remember that offensive messages, comments and inappropriate jokes are inconsistent with *Our Values* and are never acceptable.
- If you experience any job-related harassment or believe you have been treated in an unlawful, discriminatory manner, promptly report the incident to your immediate supervisor, department head, local Human Resources manager, the Vice President of Human Resources or the Chief Ethics and Compliance Officer.

For More Information

Equal Employment Opportunity Policy Statement



MAKING ETHICAL DECISIONS

QUESTION: A group of coworkers sends emails containing jokes and comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

ANSWER: You should first ask them to stop. If they won't, or if you are uncomfortable talking directly to them, you can report your concerns to your supervisor or Human Resources. You can also contact the Ethics Hotline. Sending such jokes violates *Our Values* as well as our policies. By doing nothing you are condoning behavior that can be seen as discriminatory and can seriously erode the team environment we have all worked hard to create.



HARASSMENT

We all have a responsibility to maintain a workplace free from harassment and other inappropriate conduct. We take seriously all forms of harassment, especially conduct that is sexual in nature.

Your Responsibilities

- Do your part by being professional and respectful in your interactions with others.
- Never tolerate degrading jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances, jokes or comments or other disrespectful conduct.
- Report all forms of harassment, bullying and other inappropriate conduct to your immediate supervisor, department head, local Human Resources manager, the Vice President of Human Resources or the Chief Ethics and Compliance Officer.

Harassment Can Take Many Forms

Harassment can be verbal, physical or visual and can include jokes, unwelcome touching, rude gestures, offensive emails or other disrespectful conduct.

At CMCO, we consider harassment to be a serious act of misconduct and may subject an employee to disciplinary action including immediate discharge.

For More Information

Anti-Harassment Policy



MAKING ETHICAL DECISIONS

QUESTION: My supervisor often loses his temper and yells whenever he thinks we've done something wrong. Is that harassment?

ANSWER: Whether it constitutes harassment or not, the situation creates a poor work environment. His behavior must be addressed because it undermines the commitment we've made to maintain a respectful workplace. Talk with your next-level supervisor or Human Resources.

QUESTION: While attending a conference, a coworker repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't at work and it was "after hours," so I wasn't sure what I should do. What should I have done?

ANSWER: This type of conduct is not acceptable, neither during working hours nor any work-related situations including business trips. Since you've already tried a direct approach and asked him to stop, you should notify your immediate supervisor, Human Resources or the Ethics Hotline.

PROTECTING PERSONAL INFORMATION

People inside and outside of CMCO trust us to handle their personal information with care and to only use it for legitimate business purposes. We respect the privacy of employees, as well as customers and business partners, and only use personal information when needed to operate effectively and in compliance with the law.

Data Privacy

Data privacy laws cover how we must collect, store, use, share, transfer and dispose of personal information, and we comply with those laws everywhere we operate.

Under the law, personal information includes data that can be used to identify a specific person, such as a personal address, personal phone number, photo, birth date, performance history, educational background, driver's license number, banking or payroll information, government-issued identification information, medical condition or history, or other personal information revealing race, ethnicity, religion, gender, age, mental or physical disability, military service, national origin, sexual orientation or any other characteristic protected by applicable law.

For More Information

[Privacy Policy](#)

Your Responsibilities

- Keep private, personal information safe and secure.
- Use personal information only for the legitimate business purpose intended.
- Always handle private information with care, follow our policies and protect any personal information that is entrusted to you.
- Take responsibility to suggest any improvement in data management procedures that would improve the protection of personal data.
- If you observe any personal information being inappropriately handled, report it.



MAKING ETHICAL DECISIONS

QUESTION: I found a report on the photocopier containing a lot of confidential records, including payroll information. I do not want to get anyone into trouble, but I do not think it's right that this kind of information is left for all to see. What should I do?

ANSWER: You should return the report to Human Resources in confidence right away and report your discovery and actions to an HR manager. Protecting confidentiality and privacy is the responsibility of every CMCO employee. Whoever left the papers in the copier will be counseled on their duty to protect the confidentiality of employee data.

WE PROTECT OUR REPUTATION

Deliver on our commitments.
Aim for greatness. Do your
best. Hold yourself accountable.

IN THIS SECTION:

- Fair Dealing and Supplier Relations
- Conflicts of Interest
- Gifts and Entertainment
- Accurate Recordkeeping and Financial Reporting
- Confidential Information
- Use of Company Assets
- Speaking on Behalf of the Company

As a member of the Columbus McKinnon family, your actions are a direct reflection on the reputation of the Company. The decisions you make at work are the most visible interpretation of our ethical reputation. This section has been created so we can define best practices and set expectations for those decisions.

FAIR DEALING AND SUPPLIER RELATIONS

The work and support of our suppliers and other business partners is key to our success. To create an environment in which these partners have an incentive to continue to work with us, they must be confident that they will be treated lawfully and in an ethical manner.

Your Responsibilities

- Conduct CMCO business relationships with honesty, fairness, mutual respect and non-discrimination.
- Never take advantage of our business partners through manipulation, concealment, misuse of confidential information, misrepresentation of facts or any other unfair dealing or practice.
- If you supervise suppliers and business partners:
 - Be certain that they understand our standards for high performance in ethics and compliance in addition to their contractual obligations.
 - Always select suppliers and business partners on the basis of objective criteria, not personal relationships or friendships.
 - Be alert to any signs that a supplier or business partner is violating applicable law or regulations.
 - Insist on honest accounting of time, materials and prompt deliverables to meet our standards.
 - Promptly disclose any situation that may appear to involve a conflict of interest.
 - Protect the confidential and proprietary information of our suppliers and business partners.



For More Information

Global Sourcing Policy

CONFLICTS OF INTEREST

Be proactive. Know and avoid the kinds of situations that can present a conflict.

A conflict of interest may occur when our personal interests or activities affect our ability to make objective decisions on behalf of CMCO. We have in place policies and procedures to identify and address conflicts and situations that may appear to be conflicts.

Managing Conflicts

In many instances, conflicts can be avoided or managed if certain steps are followed. Be proactive and, whenever possible, avoid situations that can lead to even the appearance of a conflict. If you find yourself in a potential conflict of interest, talk with your supervisor or the Chief Ethics and Compliance Officer. Depending on the circumstances, some conflicts may be resolved if they are proactively disclosed and handled properly.

Your Responsibilities

It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts are more common. Following are some examples:

- **Outside employment and professional activities** – You should not take on outside work that interferes with your work at CMCO, nor should you ever work for a supplier or competitor or any organization that could involve using CMCO assets, information or intellectual property. Be sure that your supervisor has approved any outside activities that may be related to your work at CMCO.
- **Financial interests** – It may be a conflict if you or a person with whom you have a close personal relationship holds a significant financial interest in a company that does business with or is attempting to do business with CMCO. Report to your supervisor any material financial interest in an outside organization. Indirect investments where you do not control specific investment choices, such as with a mutual fund, are acceptable. You should not benefit personally from any sale, loan or gift of Company property.



CONFLICTS OF INTEREST (CONT.)

- **Business with relatives** – Relatives of CMCO’s President, Vice Presidents, members of the Board of Directors and other employees who may be designated in writing by the President may not be employed by CMCO. Employees may not work under the supervision of a relative.
- **Corporate opportunities** – If you learn about a business opportunity through your work at CMCO, you may not take advantage of the situation for personal gain until you have discussed the matter with your supervisor. If CMCO declines the opportunity, you may then pursue it yourself. Use of the name or the purchasing power of CMCO to obtain discounts or rebates on purchases made for personal use, other than offers made to all employees, is inappropriate.

For More Information

Employment of Relatives/Personal Relationship Policy



MAKING ETHICAL DECISIONS

QUESTION: I have been dating another employee for a while, but now he is being transferred to my business unit. Is this a problem?

ANSWER: It may not be a problem, but it depends on the business relationship that will exist between the two of you if the transfer occurs. You need to review the situation with your supervisor or HR to determine if additional steps need to be taken.

QUESTION: My spouse is an officer in a company that does business with us. In my job I also have contact with that company from time to time. Is this a problem?

ANSWER: Every case is different. You need to talk it through with your supervisor or HR so that any issues can be anticipated and avoided. Remember, all actual or potential conflicts must always be disclosed.

GIFTS AND ENTERTAINMENT

Business courtesies, such as gifts, entertainment and meals, can help build successful business relationships, but sometimes even well-intentioned gifts or entertainment can cross the line or even be illegal.

Always ensure that gifts and entertainment are consistent with our policies, all applicable laws and regulations and are also consistent with the policies of the recipient’s organization. Generally, you should not provide or accept gifts of more than nominal value or entertainment of greater than usual or customary expense.

Your Responsibilities

- Your judgment should tell you when a gift is improper and should be refused to prevent embarrassment to everyone and to avoid what may be an unintentional violation of the law.
- Accurately record any expenses for gifts and entertainment.
- Entertainment or meals should not involve family members of an employee or of a supplier unless approved by a supervisor.
- Never offer or accept anything that would embarrass you or CMCO or harm our reputation.

For More Information

Global Travel and Expense Policy



MAKING ETHICAL DECISIONS

QUESTION: I received a gift from a potential supplier who recently submitted a bid to work on a CMCO project. I know I can’t accept it, but what should I do?

ANSWER: The best approach is to return the gift and politely explain our policy. If a bid is open, we cannot accept any gifts of any value. If the bidding process is closed and the gift is of nominal value and perishable such as flowers or cookies, place it in a break room where it can be enjoyed by everyone. Reach out to the supplier to explain our policy and also report the matter to your supervisor or the Chief Ethics and Compliance Officer.

QUESTION: While traveling for business, I contacted my brother who lives in the area. We went out to dinner and my brother suggested that I charge both his meal and mine on my corporate card and expense it. Can I do that?

ANSWER: No. Tell your brother, while you can expense your meal, unless it is approved by your supervisor you cannot expense his meal because it is not a business-related meal. You have a responsibility to be honest and accurate on expense reports.

QUESTION: A supplier offered me two tickets to a top show. They cannot come with me themselves, but have told me to take a friend. May I accept them?

ANSWER: Because the supplier is not accompanying you, the tickets are not considered entertainment but are a gift so you will need to discuss the situation with your supervisor.

ACCURATE RECORDKEEPING AND FINANCIAL REPORTING

Regulators, investors and others rely on our accurate and honest books and records. Accurate information is also essential within the Company so that we can make informed business decisions.

Employees with finance or accounting jobs have special responsibilities in this area, but all of us contribute to the process of recording business results and maintaining records. Each of us has a responsibility to ensure that the information that we record is full, fair, accurate, timely and understandable and accurately reflects the true nature of the transactions represented.

Your Responsibilities

- To meet our obligations to cooperate with audits, investigations and legal document requests, you must preserve records according to our policies, respond fully with all information requested, and refrain from editing, modifying or deleting requested information.
- Only sign documents and records that you believe are truthful and honest, and which you are authorized to sign.

DO'S AND DON'TS

Do

- Ensure that all Company accounting and financial records meet generally accepted accounting principles and all other applicable regulatory or industry standards.
- Check that our records are clear, complete, and supported by documents that explain the nature of the entries.

Don't

- Record false sales or record them early.
- Understate or overstate known liabilities and assets. Never defer recording items that should be expensed.
- Establish any accounts of unrecorded Company funds or assets, or any other types of "off the books" accounts.
- Pressure, manipulate or mislead outside accountants who are involved in auditing or reviewing our financial statements or internal controls.



ACCURATE RECORDKEEPING AND FINANCIAL REPORTING (CONT.)

Records Management and “Litigation Hold Orders”

Business records must be retained as long as needed for business purposes, or longer if required by law. Documents should only be destroyed in accordance with our records retention policy and never in response to or in anticipation of an investigation, lawsuit or audit.

If you receive a “Litigation Hold Order” you must not alter or discard any relevant information. Contact the Legal Department if there is any doubt about the appropriateness of record destruction.

For More Information

Records Retention Policy and Schedule



MAKING ETHICAL DECISIONS

QUESTION: My supervisor asked me to record an entry which will result in a possible misstatement of the value of an asset on our books. Should I do what she asks?

ANSWER: No. You may not ever knowingly misstate the value of an asset. Doing so would be a misrepresentation. It could be fraud. You need to discuss your concern with your supervisor but, if you are not comfortable doing so, seek immediate help using any of the other resources listed in the Code.

QUESTION: I don’t work in finance or accounting. Is “financial integrity” my responsibility?

ANSWER: Yes. Accuracy in recordkeeping isn’t the job of one team or one department. It’s a responsibility we all share. From expense reports and benefits enrollment forms to test data and sales invoices – all of our everyday transactions must be accurate, complete and properly recorded.

CONFIDENTIAL INFORMATION

It is important that we protect confidential Company information, including intellectual property. We must keep it secure and protect it from loss, misuse, or inappropriate access or disclosure.

Your Responsibilities

- Share confidential information only with those who are authorized and need it to do their jobs.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Never discuss confidential information when unauthorized persons might be able to overhear what is being said. For example, never have such conversations on elevators, in visitor or common areas, or when using mobile phones in non-private spaces.
- Immediately report any theft, loss or unauthorized disclosure of confidential information.

Confidential Business Information

Confidential means any information that is proprietary, not publicly known or is subject to restrictions on how it can be shared. Confidential business information includes:

- Passwords and other log-in information
- Customer and employees' personal information
- Pricing and cost information
- Supplier names, supplier lists and agreement terms
- Intellectual property, including inventions, patents and copyrights
- Data developed or purchased by CMCO or entrusted to us by third parties
- Marketing data, business and/or strategic plans



MAKING ETHICAL DECISIONS

QUESTION: A former CMCO employee has asked me for copies of materials we worked on together when they were with the Company. I also discovered that they already have a lot of printed and digital CMCO materials and data. What should I do?

ANSWER: Under no circumstances should you give them the information they have asked for, which may be confidential. They breached our policies by taking Company information with them when they left, and there could be further issues if they have used or revealed the information to others. The obligation to keep confidential Company information secure applies not only during but also following employment. Talk to your supervisor immediately and alert your local security representative and the Legal Department. They will decide what action is needed to protect our information in this case.

For More Information

Electronic Information Access, Use and Security Policy

USE OF COMPANY ASSETS

Each of us is entrusted with the care of Company assets. We all must do our part to protect these assets from loss, damage, theft, waste and improper use.

Take precautions to protect our assets. CMCO property and equipment are not to be used for employees' personal benefit. This prohibition includes items such as vehicles, construction equipment, tools and audiovisual equipment.

Your Responsibilities

- Protect CMCO's assets as if they were your own.
- Use Company assets only for business purposes.
- Seek value whenever purchasing supplies and other Company assets.
- Secure your office, workstation and equipment by locking items or completely shutting down systems.
- Report any equipment that is damaged, unsafe or in need of repair.
- Follow all Company policies and practices that are designed to protect our information networks, computers, programs and data from attack, damage or unauthorized access.
- CMCO email, information systems and internet access are the property of the Company, as is all correspondence and material contained on these systems.

CMCO Assets Include:

Physical – Facilities, vehicles, furniture, equipment and supplies

Information – Data, databases, reports, files, plans, records, intellectual property including trademarks and logos

Financial – Company funds including checks, credit cards, invoices and other records that serve a monetary value

Electronic – Computers, electronic storage devices, telephones, information systems, internet/intranet access, personal digital assistants, and other similar devices, systems and technology



MAKING ETHICAL DECISIONS

QUESTION: I have an online business that I operate from home usually on the weekends. On days when I finish lunch early, can I use my CMCO computer to process orders from the previous day?

ANSWER: No. Our policies prohibit you from doing personal business on our information systems. You must run your home business only at home, using your own computer and systems.

For More Information

Global IS Policies

SPEAKING ON BEHALF OF THE COMPANY

It is important that CMCO speaks with one clear and consistent voice when providing information to the public and the media. For this reason, only certain employees may speak publicly on behalf of CMCO.

Your Responsibilities

- Unless you are authorized to do so, never give the impression that you are speaking on behalf of CMCO in any communication that may become public.
- If you receive an outside inquiry about the Company from the financial press, investment analysts or others in the financial community, you should decline to comment, provide no information and immediately notify the Chief Financial Officer.
- If you are contacted by a regulatory agency or regulator regarding CMCO-related business, immediately notify the Chief Ethics and Compliance Officer or the General Counsel.



MAKING ETHICAL DECISIONS

QUESTION: Someone posted a claim on an online social network about CMCO that I know is false. I think it's important that we correct the misinformation. Is it acceptable if I go ahead and post a response?

ANSWER: No. While it may be tempting to correct the information and engage with the source of the misinformation, you should instead contact the Marketing Department and let them take the necessary steps.



SPEAKING ON BEHALF OF THE COMPANY (CONT.)

Using Social Media

Social media is a great way to connect with people and potential customers, but always be careful when writing anything that might be published online. Practice common sense, keep your electronic communications professional and consistent with *Our Values* and policies. Always assume the whole world can read your posts.

- Think carefully before you hit “send” to transmit an email or a text.
- Do not post information about CMCO products, services or general financial information about CMCO.
- Be careful when listing CMCO as your employer on any social media site, with the understanding that your social media activity may have an impact on CMCO.
- Take responsibility for what you post and never engage in activity online that would be unacceptable in person.

For More Information

Associate Responsibilities in a Public Company Policy

Social Media Policy



MAKING ETHICAL DECISIONS

QUESTION: I have a personal blog where I share my thoughts and feelings with my friends. What should I consider before including any work-related information?

ANSWER: Be careful. Social media tools such as blogs, wikis, networking sites, etc., are subject to the same rules as any other communications. Do not disclose any confidential business information. For example, do not write about our customers, the status of any projects, organizational changes, relationships with customers or vendors, financial information, personal employee information or any other sensitive or confidential information.



WE FOLLOW THE LAW

We have a responsibility to be honest and transparent about our operations and performance.

IN THIS SECTION:

- Fair Competition
- Protecting Inside Information
- Anti-bribery, Anti-corruption
- International Trade

Certain laws are particularly critical for anyone in business to understand and follow. If we do not comply with those laws, we put ourselves, our Company, and the security of all our stakeholders at risk. Sometimes understanding the law and how it applies to a specific situation can be difficult. When in doubt, ask for assistance from the CMCO Legal Department.

FAIR COMPETITION

We believe in a competitive marketplace. Competition or antitrust laws are intended to ensure that competition is open and fair and in the best interest of the public.

Competition or antitrust laws are complex, and compliance requirements can vary depending on the circumstance. Avoid collaborating, or even the appearance of collaboration, with competitors. If your role at CMCO involves discussing, negotiating or finalizing agreements or contracts, you have a greater responsibility to be sure you understand the relevant rules governing fair competition.

Your Responsibilities

- Use extreme caution in any communications with competitors. Unless you have approval, never develop any written, verbal or indirect agreement or understanding with a competitor, or discuss pricing, marketing or other competition practices with them.
- When collecting competitive intelligence, always live up to our standards of integrity – never engage in fraud, misrepresentation or deception to obtain information.



MAKING ETHICAL DECISIONS

QUESTION: We recently hired a new employee who previously worked for one of our suppliers. She says she has confidential information about pricing from her previous job that can be useful to us. Is it OK for me to look at the information and use it to CMCO's advantage?

ANSWER: No, it is not. We need to respect the confidential information of our business partners, third parties and suppliers just as we expect them to respect our confidential information. Explain to the new employee that we cannot use the information.



FAIR COMPETITION (CONT.)

Antitrust “Red Flags”

The following activities are examples of “red flags” and should be avoided and reported to the Legal Department:

- Fixing prices or coordinating pricing with other organizations at an agreed-upon level
- Allocating markets, geographies or customers among competitors
- Rigging bids with another organization, such as agreeing which party should win a bid or exchanging bid prices
- Reciprocal dealing with customers or suppliers
- Setting product terms or agreements with competitors

If you have any questions, you should discuss the matter in advance with the Legal Department.

For More Information

[Federal Trade Commission, Guide to Antitrust Laws](#)



MAKING ETHICAL DECISIONS

QUESTION: I will be attending a trade association meeting, and I’m worried that my discussions may violate antitrust laws. I’m not sure what I can and cannot discuss. What should I do?

ANSWER: You are right to be concerned, but the situation can be managed. Trade association meetings are an excellent way to stay informed and connected, but since they bring together competitors, they can lead to antitrust violations. Before the meeting, discuss your concerns with the Legal Department. You can review the agenda and discuss who might be there and what topics may come up. When you are at the meeting, if a discussion begins that may involve inappropriate topics, stop the conversation, break away and promptly inform the Legal Department.

PROTECTING INSIDE INFORMATION

In the course of our work, we may become aware of “inside information” about CMCO or other publicly traded companies. Using this information for personal gain or sharing it is not only unfair to other investors, it is illegal.

What constitutes “inside information” can be a complicated question. If you have any questions about what “inside information” is, or about whether information is “material” or “nonpublic,” please contact the Legal Department.

Your Responsibilities

- Never buy or sell any stocks, bonds, options or other securities of any public company including CMCO, based on “inside information.”
- Do not “tip” others, such as friends and family, so that they can take advantage of the information. This, too, is illegal.



Definitions

Inside information is information that a reasonable investor would find useful in determining whether to buy, sell or hold a stock or other security and that **has not been released to the public**. Inside information may be information that could be perceived as either positive or negative.

Information is **“material”** if there is a substantial likelihood that a reasonable person would consider the information important in making a decision to buy or sell securities.

Information is **“nonpublic”** until one full business day after it has been widely disseminated to the public through a press release and/or a report made to the SEC.

Examples include a potential business acquisition, important product developments, the acquisition or loss of a major contract, or an important financing transaction.

For More Information

Associate Responsibilities in a Public Company Policy
Insider Trading Policies

ANTI-BRIBERY, ANTI-CORRUPTION

Always work honestly and with integrity. Never offer or accept a bribe or kickbacks from anyone – and remember, we are not only responsible for our actions, but also for the actions of any third party who represents CMCO.

Key Definitions

A **bribe** is anything of value that is given to influence the behavior of someone in government or the private sector in order to obtain business, financial or commercial advantage.

A bribe can be something other than cash. A gift, a favor, even an offer of a loan or a job could be considered a bribe.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities.

A **government official** includes anyone who works for or is an agent of a government-owned or government-controlled entity. This includes elected and appointed officials of national, municipal or local governments. It also includes officials of political parties and candidates for political offices, as well as employees of a government or a state-controlled company.



MAKING ETHICAL DECISIONS

QUESTION: One of our suppliers offered to waive a transaction fee in exchange for us interviewing her very qualified son for an open position. We could save money and potentially hire a great candidate. Is this OK?

ANSWER: No, this could be construed as a bribe. The client has offered something of value – the fee waiver – in exchange for favorable treatment – an interview. What may seem beneficial at the outset is, in fact, improper and perhaps even illegal. The best course of action would be to report the incident right away.



ANTI-BRIBERY, ANTI-CORRUPTION (CONT.)

Your Responsibilities

- Do not give or accept bribes or kickbacks, or accept or provide any other kind of improper payment.
- Do not pay facilitation payments. If a facilitation payment is requested, report the request to the Chief Ethics and Compliance Officer.
- Keep accurate books and records so that payments can be honestly described and documented.
- Watch out for anyone doing business on our behalf that has a reputation for questionable business practices. Be vigilant and monitor their behavior.
- Any questions about compliance with anti-bribery and anti-corruption laws should be referred immediately to our Chief Ethics and Compliance Officer.

For More Information

Foreign Corrupt Practices Act Policy



MAKING ETHICAL DECISIONS

QUESTION: I was authorized to hire a consultant to help us get the local permits needed for a new project. They asked for a \$40,000 retainer to “help move the process along.” Should I agree to this payment?

ANSWER: No. Before engaging the consultant, you need to consult with our Chief Ethics and Compliance Officer and complete due diligence on the consultant. Before agreeing to make any payment, we need to know how the money will be used. We must make sure this money is not used as a bribe or facilitation payment.

INTERNATIONAL TRADE

Many laws govern the conduct of trade across borders, including laws that are designed to ensure that transactions are not being used for money laundering. Other laws prohibit companies from cooperating with unsanctioned boycotts and others regulate imports and exports. We are committed to complying with all such laws.

Your Responsibilities

- If you are involved in international operations or the import or export of our products, it is especially important that you know and comply with the requirements associated with the countries in which you do business.
- Maintain required import, export and customs records at each CMCO business location.
- If you receive a request to participate in a boycott or are asked about our position on a boycott, contact the Chief Ethics and Compliance Officer immediately.
- If you have any questions or concerns about trade laws or possible violations, contact the Chief Ethics and Compliance Officer.



MAKING ETHICAL DECISIONS

QUESTION: What are the sanctioned countries CMCO cannot do business with?

ANSWER: Countries subject to a trade embargo or comprehensive sanctions are Cuba, Crimea (Region of Ukraine), Iran, North Korea and Syria. This list changes. If you have any questions, you should contact the Export Department or the Legal Department.

Economic Sanctions, Export Control and Anti-boycott Laws

In compliance with U.S. and other applicable economic sanctions programs, employees are prohibited from conducting business with or benefiting: (1) certain countries, their governments (including government agents and government-owned entities) as well as nationals and private entities located in those countries; and (2) designated individuals or entities (involved in or connected to certain activities, including global terrorism, weapons proliferation or narcotics trafficking) and any entity in which one or more designated individuals or entities, directly or indirectly, owns a 50% or greater interest. If you have any questions regarding whether a vendor, customer or other party with whom we might do business is subject to these prohibitions, consult with the Chief Ethics and Compliance Officer.

As a global organization, CMCO and its subsidiaries' employees may be required to follow economic sanctions or embargo laws of multiple jurisdictions. Since countries' sanctions laws may conflict, in such a situation it is important that you contact the Chief Ethics and Compliance Officer.

Employees must also comply with applicable export control laws. While economic sanctions regulations restrict transactions with certain countries, entities and individuals, export control laws govern how certain information, technologies, and goods are transmitted across borders. The laws are based on the goods and their component parts and the restrictions follow the goods even when being transshipped or reexported across boundaries. If you have any questions regarding whether exports or reexports are subject to controls or prohibitions, consult with the Chief Ethics and Compliance Officer.

INTERNATIONAL TRADE (CONT.)

Money Laundering

Money laundering is an attempt to hide the proceeds of criminal activity by making those proceeds look legitimate. It is important that we know and comply with all laws and regulations intended to prevent money laundering. This means we must make and receive payments for goods and services only via approved and documented payment practices, and we must be vigilant and exercise good judgment when dealing with unusual customer transactions.



MAKING ETHICAL DECISIONS

QUESTION: A supplier has asked that we send payments to a new address outside the country of business. I am suspicious that there might be something illegal or inappropriate going on.

ANSWER: You are right to be suspicious. This may be an effort to launder money or to otherwise avoid legal requirements. You should contact our Chief Ethics and Compliance Officer without delay and in the meantime, do not change the address until the Chief Ethics and Compliance Officer has told you otherwise. If possible, do not have any further discussions with the supplier about the request.

QUESTION: My work requires regular interaction with customs officials. As part of my job, I am routinely asked to provide the Customs Service with information about our imports and exports. Do I really need to contact the Legal Department before every submission of information to the government?

ANSWER: The right approach here would be to discuss with the Legal Department the types of requests your department routinely receives from Customs. These routine requests, once understood, might be handled without any legal review. Extraordinary requests would still require review to ensure that you are responding accurately, fully and in accordance with the law.



WE ARE ENGAGED IN THE COMMUNITIES WHERE WE LIVE AND OPERATE

We can never be satisfied with who we are today ... We can, and will, be even better tomorrow.

IN THIS SECTION:

- **Serving Our Communities**
- **Political Activities and Contributions**
- **Sustainability and Environmental Stewardship**

Working for a successful company provides us with influence and resources that can be used to better both our communities and the planet. CMCO has a proud heritage of giving back to our communities. All of us strive to have purpose and meaning in our lives, and we have the opportunity to lead our Company with that same aspiration.

SERVING OUR COMMUNITIES

We are committed to the local communities where our facilities are located, including supporting various non-profits, charities and other community programs. Employees are encouraged to take an active role in their communities and to participate in Company-sponsored activities.

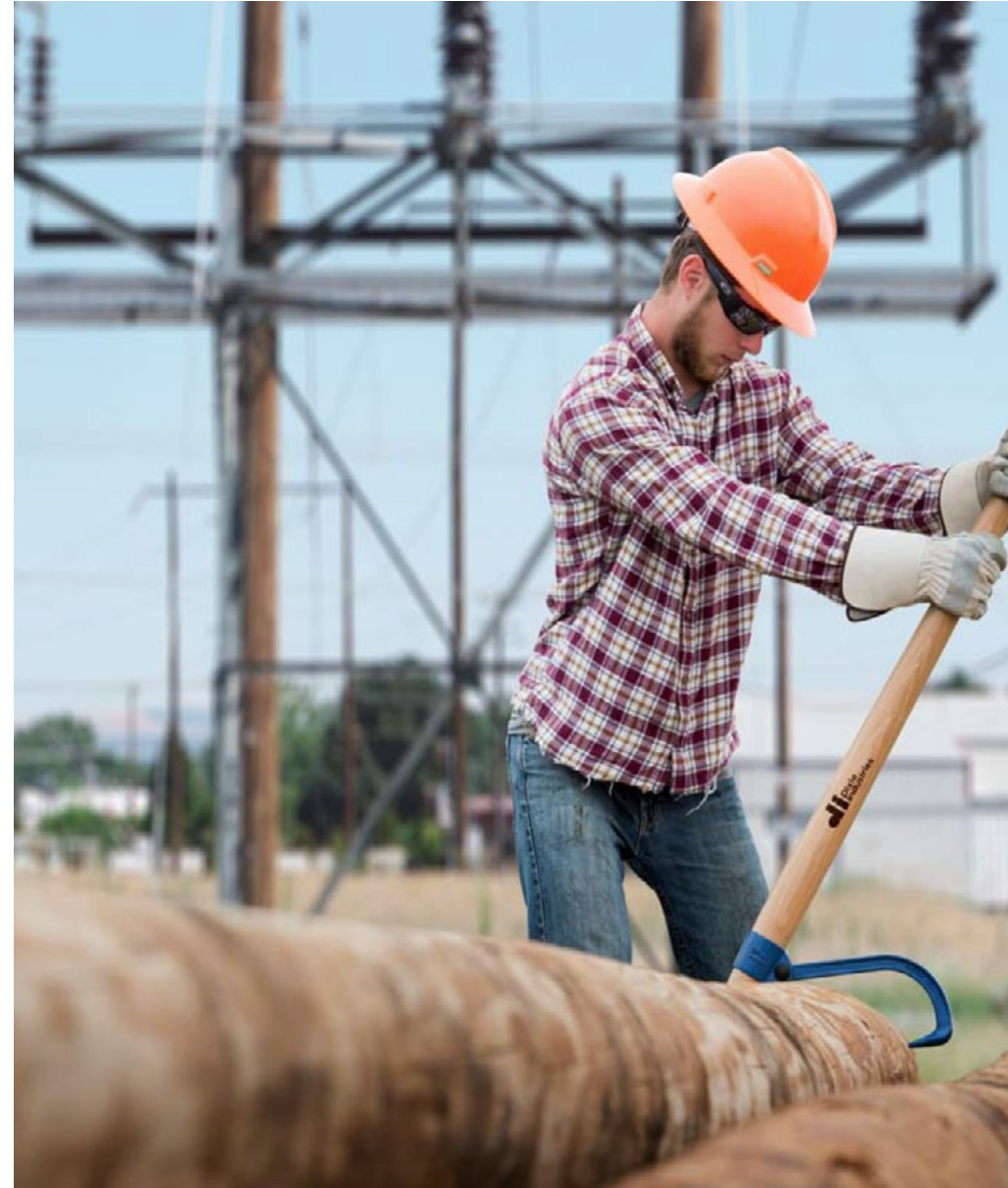
Your participation in Company-sponsored community activities is voluntary, and you should never feel pressured or required to participate, either by financial contributions or your efforts or presence.

Your Responsibilities

- Do not make any direct or indirect contribution on behalf of CMCO unless you are specifically authorized to do so.
- If you volunteer to help charitable organizations, be sure that your participation does not interfere with your work responsibilities, and when you are representing the Company, that you demonstrate an ethical and professional demeanor.
- You are prohibited from soliciting or pressuring business partners or other employees to support your favorite charities or causes.

For More Information

Solicitation and Literature Distribution Policy



POLITICAL ACTIVITIES AND CONTRIBUTIONS

We believe in the rights of our employees to participate in the political process, but if you choose to be politically active, do so as an individual citizen on your own time and at your own expense.

Laws and regulations place numerous restrictions on the Company's role in political activities and funding. In accordance with applicable laws, we exercise our right and responsibility to make our position known on relevant policy issues to government leaders, when appropriate.

Your Responsibilities

- Your political statements must be identified as yours and not CMCO's.
- Make sure that any political work you do is done on your own time and without the use of Company assets or funds.
- Never pressure others to contribute to, support or oppose any cause, political candidate or party, and do not solicit contributions or distribute political literature during work hours.
- Unless you are authorized to do so, never make political campaign contributions on behalf of CMCO, and do not engage in any political advocacy or "lobbying" activities.



MAKING ETHICAL DECISIONS

QUESTION: I went to a fundraising dinner for a candidate for a local government office. This candidate takes positions favorable to our interests, so can I claim the dinner on my expense report?

ANSWER: No. If you did this, it would be considered a political contribution, which would violate our policies. While you are free to attend political fundraising events as an individual, you must not use CMCO assets or funds or give the impression that you are representing the Company. If you think your involvement might create a conflict of interest or appear inappropriate, discuss it with your supervisor.

QUESTION: I am a volunteer for a political campaign. Because traffic can be so bad after work, can I stay in and use my computer to work on some campaign materials?

ANSWER: No. While we support everyone's right to participate in the political process, you must use your own resources and time for personal, political activities.

SUSTAINABILITY AND ENVIRONMENTAL STEWARDSHIP

We are committed to complying with all relevant environmental laws, and we work to continuously improve our conservation efforts. We strive to meet or exceed applicable environmental laws and regulations, and we use environmentally sound practices to ensure the protection of our surrounding environment.

We believe sound corporate citizenship is essential to our success. We are committed to operating with integrity, contributing to the local communities surrounding our offices and facilities, and focusing on being thoughtful environmental stewards.

Your Responsibilities

- Do your part to minimize the environmental impact of our operations.
- Be proactive and look for ways to reduce waste and use energy and natural resources more efficiently.
- Participate in continuous improvement and housekeeping initiatives leading to waste reduction and energy efficiency.
- Recycle when you can and conserve paper by limiting printing.
- Employees who work directly with regulated materials have specific responsibilities to ensure they are used, stored, transported and disposed of in a legal, safe and responsible way.
- Take into consideration environmental impact in the course of developing new products or processes, in selecting production materials, and before buying, leasing or selling our products or materials.



- If you know or suspect that an environmental violation has occurred, is occurring or may occur in the future, you must bring the matter to the attention of your supervisor, department head or the Chief Ethics and Compliance Officer.
- Speak up if you have any suggestions about reducing our environmental impact.

For More Information

Corporate Environmental Protection Policy

ADDITIONAL RESOURCES

If you have a question, or if you know or suspect that there has been a violation of our Code, our policies or applicable law, you have an obligation to speak up. You have several options. In most cases, your immediate supervisor should be your first point of contact. He or she is likely to be in the best position to understand your concern or question and take the appropriate action.

If you're uncomfortable speaking with your supervisor, or your supervisor is unable to answer your question, or if you have already shared a concern and believe it's not being appropriately addressed, you have additional options:

Resource:	Contact:
Human Resources Department	Additional contacts can be found on the HR Intranet Page
Legal Department	Mary O'Connor Assistant General Counsel & Chief Ethics and Compliance Officer 716-689-5465 Additional contacts can be found at Legal Intranet Page
Internal Audit Department	Rick Wade Director – Internal Audit 716-689-5457
Ethics Hotline	EthicsPoint Website

Nothing in this Code or in any of our policies is intended to limit or interfere with the right to engage in activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.

Waivers

The provisions of this Code may be waived for directors or executive officers only by a resolution of CMCO's independent directors. The provisions of this Code may be waived for employees who are not directors or executive officers by the Company's Vice President of Human Resources upon the advice and consent of the Chief Ethics and Compliance Officer.

Any waivers granted will be disclosed as required.

