	Policy Title: Company Code of Conduct	Policy Number: Global Policy 001
		Classification: Compliance
Originally Published: October 2015, June 2016	HUMAN RESOURCES	Effective Date: October 1, 2015
Revision(s): None	PROPERTY OF ROTOMETRICS	Page 1 of 1

I. PURPOSE

RotoMetrics Holdings, Inc., Roto-Die Company, Inc. and all of its subsidiaries, d/b/a RotoMetrics® (collectively “the Company”) is committed to conducting its activities in full compliance with all applicable local laws and regulations and to operate at the highest levels of legal and ethical conduct in all of its businesses. To help guide employees and ensure compliance with these principles, the Company has implemented certain global policies for all employees. This document identifies those policies.

II. SCOPE

This Policy applies to all Company entities, Directors, Managers, and Employees. It is the Company’s intention that these policies also extend to any representative, agent or distributor of the Company and contracts and agreements should reflect these policies where indicated.

III. DEFINITIONS / DESCRIPTION

The Company has adopted the global policies noted below. It is the responsibility of all employees, directors and officers of the Company to become familiar with these policies and ensure compliance:


Policy 002 – Anti-Discrimination Policy. The Company is committed to providing equal opportunity for employment and advancement regardless of a person’s sex, religion, race, disability or sexual preference.

Policy 003 – Compliance with U.S. Office of Foreign Corrupt Practices Act (“FCPA”). The Company is committed to a zero tolerance policy regarding the bribery of any government official, either directly or indirectly, by any director, officer or employee or by any agent, representative, or distributor.

Policy 005 – Political Contributions. Company contributions to Political Action Committees (“PACs”), political parties, and/or political campaigns for elected officials or individuals running for political office are prohibited.

Policy 006 – Expert Networks. Employee participation in Expert Networks is prohibited even in cases where the employee is not compensated for such participation.

Policy 007 – Human Rights Policy. This Code of Basic Working Conditions and Human Rights represents the commitment of RotoMetrics to fundamental standards that make RotoMetrics a good place to work. RotoMetrics is committed to the protection and advancement of human rights in its worldwide operations, and the concepts in this Code are generally derived from RotoMetrics policies and practices already in place, but which have not previously summarized in a single document.

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IV. POLICY

All Directors, Officers, and Employees are expected to comply with these policies. Site managers are responsible for ensuring employees are informed of these policies and receive adequate training to ensure compliance.

Violations of these policies will result in corrective action that may include, but not limited to, verbal and written warnings, suspension from work, and termination.