

Global Code of Conduct

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Introduction

Appropriate Business Ethics and Conduct Make a Difference

Each day you will face and make decisions that are critical to A&E's success. However, there will never be a business requirement that will ever justify an unethical, immoral or unprofessional act. How we do business and how we treat others are critical to protecting our global business and reputation in the industry.

The primary purpose of this Global Code of Conduct is to ensure that all A&E associates around the world understand and adhere to the highest standards of conduct, and that we provide our customers with consistent quality, service and value throughout all markets. We also hope that this Global Code of Conduct will provide you with a readily accessible reference for you to use to make good decisions in your job. This Global Code of Conduct does not attempt to address every situation you may encounter or requirement for your position, but sets forth A&E's basic expectations concerning your professional and personal behavior as well as basic rules and procedures that A&E expects each and every associate to follow. You should use this Global Code of Conduct in conjunction with the Global Policies and Procedures and with the policies, procedures and work rules of your department, subsidiary or business unit. If you are ever unsure about how to apply this Global Code of Conduct to a particular situation, ask your supervisor or manager, or any member of the A&E Ethics Committee. Ultimately, your personal integrity and that of our company relies upon your individual judgment in choosing the correct course of action.

Though not every issue discussed in this Global Code of Conduct will be relevant to every employee, A&E expects all personnel around the world to familiarize themselves with the Global Code of Conduct so that they understand and comply with these policies. A&E ensures that this Global Code of Conduct is followed by all of our controlled subsidiaries. In addition, we work with our joint venture partners and our licensees to also conduct their businesses in the spirit of this Global Code of Conduct.

Penalties for Violation

Respecting the principles and complying with the policies in this Global Code of Conduct is a condition of your employment with A&E. Any director, officer or employee who violates these policies will be subject to disciplinary action up to and including dismissal.

Addressing Integrity Concerns

A&E provides many sources to assist you with questions about compliance with this Global Code of Conduct and integrity issues. A good idea is to always raise questions if you have doubts about whether an action or situation may be improper. You should first discuss the issue with your direct supervisor who knows you and your workplace. If you are not comfortable discussing the issue with your supervisor or your supervisor is unable to find the answer, you should discuss the issue with the following:

- With other manager(s) in your reporting chain; or
- With any member of the Ethics Committee (the President of A&E, the Corporate Senior Vice President–Finance, or the Corporate Vice President–Human Resources) by calling +1 (704) 827-4311 or toll free in the U.S. at +1 (800) 453-5128.

You should know that it is a violation of this Global Code of Conduct for A&E personnel to seek retribution or retaliation against those who raise good faith concerns. “Good faith” does not mean that you have to be right, but does require that you are telling the truth, as you understand it.

Administration of the Global Code of Conduct

Each of A&E's Corporate Senior Vice Presidents, other direct reports to the President of A&E, and A&E's Corporate Counsel are responsible for administration of the Global Code of Conduct.

Ethics Committee

A&E's Ethics Committee provides oversight, advice, support, and general guidance, as appropriate, to A&E's Corporate Senior Vice Presidents, other direct reports to the President of A&E, and A&E's Corporate Counsel in the discharge of their duties. The Ethics Committee is comprised of the A&E President, the Corporate Senior Vice President–Finance and the Corporate Vice President–Human Resources.

Training and Education

A regular global training and education program will be developed and maintained on the Global Code of Conduct, all compliance policies and applicable laws, rules, and regulations (the “A&E Policies”). The purposes of this training program will be to ensure that all A&E personnel are familiar with the requirements of, the

importance of compliance with, and their responsibilities pursuant to A&E Policies. The compliance communication and training program will be implemented at each of A&E's locations.

All A&E personnel will receive a copy of the Global Code of Conduct. Along with the Global Code of Conduct, all A&E personnel will receive a certificate that he or she must sign acknowledging that he or she read and will comply with this Global Code of Conduct.

Within a reasonable period following the close of each fiscal year, all active A&E USA salaried-exempt and commissioned sales associates on the payroll at the end of each fiscal year are required to read this Global Code of Conduct and complete a Global Code of Conduct Declaration (the "Declaration"). For A&E locations in other countries, the Ethics Committee, with input from the applicable General Manager, will be responsible for identifying the associates at each location who would be required to read this Global Code of Conduct and complete the Declaration within a reasonable period following the end of each fiscal year.

This Global Code of Conduct is not intended to create any contractual or other legal rights for associates and may be changed from time to time, with or without notice to associates. Please refer to the Employment Contract Disclaimer in the Introduction to A&E's Policies and Procedures.



Integrity in A&E Business

Rules that Govern How We Do Business Everyday

Conflicts of Interest

A conflict of interest may exist when your private interest interferes, or appears to interfere, with the interests of A&E. You should always base your business decisions on A&E's needs, rather than your own interests. For example, conflicts of interest may arise (i) when you take actions or have interests that may make it difficult to perform your work objectively and effectively; (ii) when you or a member of your family receives improper personal benefits as a result of your position in A&E; or (iii) when A&E makes loans to, or guarantees obligations of, you or your family members.

As a matter of A&E policy, conflicts of interest should be avoided. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management, and if you become aware of a conflict or potential conflict, you should bring it to the attention of the Ethics Committee. The Ethics Committee will then review the matter and determine the appropriate course of action on a case-by-case basis.

Personal Business Relationships

Specifically, you shall not have any position with, or substantial interest in, any other business enterprise that might affect your independence of judgment with respect to transactions between A&E and the other business enterprise. You must ensure that your personal business relationships never influence the decisions you make for A&E. Absent other factors, mere ownership of securities representing less than one percent (1%) of the outstanding class of such securities of a publicly traded business enterprise will not constitute a conflict of interest.

Doing Business with Relatives

Prior approval of the Ethics Committee is required for an A&E employee to conduct business with A&E for personal benefit or for the benefit of a relative.

Gratuities, Gifts, and Entertainment

No A&E employee shall receive or agree to receive any payments, gifts, entertainment, or other favors or remuneration that go beyond our standards or that might be seen as a customer's or supplier's condition of doing business with A&E. Seasonal, incidental gifts are allowed, *provided, however*, that any gifts, entertainment, or other favors or remuneration exceeding US \$250 in value from any customer or supplier must be disclosed to the Ethics Committee. In addition, any invitation from a customer or supplier that provides for travel and overnight lodging must be disclosed in writing to the Ethics Committee, and approved in writing by at least two members of the Ethics Committee before you accept the invitation.

Gathering Competitive Information

A&E values properly gathered business information. Information about our competitors should only be gathered from public sources that are freely available to others. No A&E personnel should ever spy or steal to obtain competitive information.

Your Responsibilities

- Comply with laws and ethical principles above private, personal gain.
- Do not have a position with, nor financial interest in, another business that might interfere with your A&E duties or responsibilities unless approved by the Ethics Committee.
- Do not conduct business between A&E and a relative without prior approval from the Ethics Committee.
- Report any violations of conflict of interest policies to the Ethics Committee.
- Avoid accepting gifts above modest value when dealing with suppliers or customers.

Insider Trading

As an employee of A&E, you may have access to material information related to A&E or other companies before the general public knows of such information. This type of information is commonly referred to as “insider” information. If you have access to “insider” information, you and your family members are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of A&E business. All material, non-public information about A&E or other companies should be considered “insider” information. To use material, non-public information for personal financial benefit or to “tip” others that might make an investment decision on the basis of this information is not only unethical, but also illegal. These rules also apply to more complex transactions such as options, puts and calls, and other derivative securities. The best way to know that information is public is to see it in the newspapers or on television.

Any questions related to this “insider” information should be directed to the A&E Corporate Legal Department or the Corporate Senior Vice President–Finance.

Your Responsibilities

- Do not trade in securities based on non-public information.
- Do not pass “insider” information to anyone who has no need to know.

International Trade Laws

A&E conducts business all over the world. Sometimes the actions taken in one country can create legal exposure for A&E under the laws of another country. This is particularly true under U.S. laws. Anti-competition and trade regulation laws are complex and cannot be fully explained in this guide. For this reason, A&E has created certain global trade department policies and procedures and provides additional training for A&E personnel who are likely to encounter these laws when performing their job. However, A&E requires that all personnel have a basic understanding of the issues arising under these laws.

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (“FCPA”) prohibits any U.S. company or any of its worldwide subsidiaries, affiliates, or agents from making payments to foreign government officials or foreign political parties or officials thereof, either directly or indirectly through another person, for purposes of (i) influencing any act or decision of such foreign official or (ii) obtaining or retaining business. In many instances, persons who would not be government officials in the United States might be government officials in a foreign country if the government directly or indirectly owns or operates their place of employment. Therefore, particular care should be directed to the status of any person receiving a payment or non-cash benefit, as well as to the use of agents in foreign countries who might be involved in activities prohibited by the FCPA.

Certain limited exceptions apply to the FCPA, but whether a payment may qualify as an exception is usually a legal question. Also, in some instances, “reasonable and bona fide” expenditures, such as travel or lodging expenses, can be reimbursed to a foreign official, if related to the demonstration or promotion of products or services; however, if and to what extent a particular expense is reimbursable will require a legal assessment. A&E personnel and affiliates should not, however, try to assess the legality of a proposed payment under any of these exceptions, and instead should consult the A&E Corporate Legal Department prior to making any payment to foreign government officials.

Your Responsibilities

- Consult with the A&E Corporate Legal Department to understand FCPA and other anti-bribery rules and to take appropriate action.
- Contact A&E management or the A&E Corporate Legal Department if a government official seeks something of value.
- Do not assume that a practice is acceptable because another company has supposedly done it.
- Do not give or promise anything of value to a government official without the approval of your manager and the A&E Corporate Legal Department.

Antitrust and Fair Competition

A&E's policy is to ensure that all operations, activities, and business affairs of A&E are conducted in full compliance with all applicable antitrust and competition laws in the United States and in all the other jurisdictions in which A&E operates. A&E will not engage in any illegal behavior that harms competition, including, but not limited to, entering into illegal agreements with competitors or illegal arrangements with suppliers, distributors, or customers. It has always been, and always will be, A&E's policy to make its own independent decisions about what products to offer, where and how to offer them, and how much to charge for them.

A&E policy states that there should be no agreements (or attempts to reach an agreement) with any representative of a competitor regarding prices, pricing policies, discounts, allowances, or any other terms of sale. In addition, competitors may not agree among themselves to allocate customers, markets, or territories, or to boycott any supplier or customer, or to undertake any other action or non-action that harms competition.

As with any law, failure to comply poses significant risks to A&E, its officers, and associates. Penalties for violating the antitrust laws can be particularly severe and can have long-term impacts on both the involved individuals and on A&E as a whole. Accordingly, all A&E personnel are obligated to comply with this antitrust policy. Each officer and associate is responsible for ensuring that A&E business is conducted in compliance with all applicable antitrust laws.

Most antitrust and fair competition laws also prohibit the use of a dominant market position to monopolize that market or to control prices or exclude competitors from entering that market, independent of natural market forces.

Antitrust law compliance is a complex and highly technical area of the law. If you have any questions about antitrust compliance, please contact your supervisor or the A&E Corporate Legal Department. A&E personnel found to be violating this policy are subject to disciplinary action, up to and including dismissal, and may be subject to civil and criminal penalties.

Your Responsibilities

- Never discuss prices or products, either formally or informally, with any employees of A&E's competitors.
- Never make untrue or malicious statements about A&E's competitors.

Trade Sanctions

Occasionally, governments place trade or travel restrictions on imports from or exports to foreign countries. A&E's U.S. operations are subject to U.S. export laws, which primarily restrict the destination and end user of A&E's products, including such products re-exported from a foreign country to a prohibited destination or end user. In some cases, no products, regardless of their origin, may be shipped to certain destinations. A&E's policy is to comply with all laws that are enacted to restrict trade with certain countries and it is important that all A&E personnel who are involved with exports become familiar with all the regulations and procedures that apply to his or her business activities.

Your Responsibilities

- Do not assume that export control rules do not apply to non-U.S. sales.
- Consult with the A&E Corporate Legal Department if you have any questions or concerns about compliance with any trade laws.

Anti-Boycott

U.S. anti-boycott laws prohibit A&E (including its controlled foreign subsidiaries and affiliates) from refusing to do business with another person or taking other actions in support of a boycott not sanctioned by the U.S. Government. U.S. law requires A&E and its controlled foreign subsidiaries to report to the U.S. government any requests that they may receive to engage in a boycott. If any A&E employee receives a written or oral request to take any action or non-action that has the effect of furthering or supporting any boycott, he or she should promptly report the request to the A&E Corporate Legal Department for guidance on how to respond.

Your Responsibilities

- Report any requests to participate in a boycott to the A&E Corporate Legal Department.

Security

A&E is committed to maintaining compliance with the best practices of access, personal, procedural, and physical security as it relates to our manufacturing, warehousing, and shipping processes.

Political Activity and Contributions

The financial and other resources of A&E shall not be used for the purpose of supporting directly or indirectly the campaign of any candidate for political office, the reimbursement of any direct or indirect political contributions by any individual, or for the purpose of making payments, donations, or gifts to government officials or employees. A&E does encourage all A&E personnel to participate individually in political affairs with his or her own time and resources.

Complying with the Law

It is A&E's policy to ensure that all of its operations, activities, and business affairs are conducted in full compliance with all applicable laws in every jurisdiction in which A&E operates.

Obedying the law, both in letter and in spirit, is the foundation of A&E's ethical standards. Although not all of us are expected to know the details of all applicable laws, it is important to know enough to determine when to seek advice from supervisors, managers, the A&E Corporate Legal Department, or other appropriate personnel. As necessary, A&E will hold information and training sessions to promote compliance with all applicable laws, rules and regulations.

Quality and Testing

A&E is committed to providing world-class quality products and services that meet or exceed customer requirements. World-class quality is crucial to our success and is achieved through continuous improvements of processes and is defined as being on-target with minimum variation. All test documentation should be completed accurately and promptly.



Integrity in the A&E Workplace

Rules that Govern How We Live
and Work as A&E Employees

Fair Treatment of People

Equal Opportunity Employer

A&E is an equal opportunity employer. A&E's policy is to provide equal employment opportunity to all qualified associates and qualified applicants for employment without regard to race, color, religion, sex, national origin, age, disability, or any other classification protected by applicable law. This policy applies to all terms and conditions of employment including, but not limited to, hiring, benefits, transfer, compensation, promotion, leave of absence, dismissal, and lay-offs.

Non-Discrimination/Non-Harassment

We ask and require that all A&E personnel add their support to achieving our objectives of equal opportunity employment and of zero tolerance for any type of illegal harassment or discrimination. Any violation will be dealt with immediately and A&E personnel, including any manager or supervisor, who engage in such behavior will be subject to appropriate disciplinary action up to and including dismissal.

All A&E personnel are entitled to be treated with dignity and respect. The Company is therefore committed to providing a work environment free from harassment, intimidation, and coercion based on or related to race, sex, religion, national origin, age, disability, or any other classification protected by applicable law. Such behavior is inconsistent with our philosophy of mutual respect for all A&E personnel and will not be tolerated.

Illegal and improper harassment may include but is not limited to the following:

- Making unwelcome comments about a person's appearance, body, or personal life
- Offensive or abusive physical contact
- Use of offensive nicknames or terms of endearment
- Offensive jokes or unwelcome innuendoes

- Any suggestion that sexual activities, race, gender, religion, national origin, age, disability, or any other protected classification would affect one's job, promotion, performance evaluation, or working conditions
- Displaying offensive objects or pictures; or
- Other conduct that, even if not objectionable to some A&E personnel, creates a working environment that may be considered by others to be offensive or hostile.

Sexual harassment, in particular, may consist of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when one or more of the following occur:

1. Submission or rejection of such conduct is made a term or condition of an individual's employment;
2. Submission or rejection of such conduct is used for the basis of an employment decision, such as promotion, demotion, dismissal, or pay; or
3. Such condition interferes with an associate's work performance or creates a hostile, intimidating, or offensive work environment.

Drug-Free Workplace

A&E is committed to ensuring that all employees refrain from engaging in unlawful drug activity in the workplace. To attain this goal, A&E has established a Substance Abuse Policy.

A&E will take appropriate disciplinary action, up to and including dismissal, against any employee who violates this policy. Where permitted by local laws, A&E reserves the right to test any A&E employee if he or she appears unfit for work due to suspected illegal drug use or abuse of a controlled substance.

All A&E personnel have an affirmative duty to disclose any and all known or suspected violations of this policy to the appropriate Human Resources department personnel.

Child Labor and Forced Labor

A&E will not engage in or condone the unlawful employment of children in the workplace or engage in or condone the use of forced labor. A&E has a minimum age for employment that is the highest of 16 years, the local minimum age or the mandatory school age.

Wages

A&E is committed to being competitive in wages prevailing in the local industry, but will ensure that wages will never be below local minimum wage laws applicable to each of its operations.

Workplace Threats and Violence

Threats, threatening behavior, acts of aggression, or acts of violence against A&E personnel, customers, vendors, or other individuals while on-duty or while on A&E property are prohibited. In addition, threats, threatening behavior, acts of aggression, or acts

of violence against associates while off-duty are prohibited. Violation of this policy will subject such person to disciplinary action, up to and including dismissal.

Fraudulent Conduct

A&E personnel who intentionally deceive or defraud another person or business in a transaction are likely to be in violation of both criminal and civil laws in most, if not all, of the jurisdictions in which A&E does business. In addition, the discussions around such deceptive transactions through the telephone, facsimile, email, or postal mail might give rise to claim of fraud. United States laws on fraud are far-reaching and violation would subject such A&E personnel to severe fines and imprisonment. To avoid any such liability, A&E personnel should take great care to ensure that there are no intentional misrepresentations regarding A&E's products in offers to customers, in any filings or reports to any governments or banks, or in any similar documents. A&E will not condone fraudulent conduct and it is imperative that all A&E personnel act in accordance with all applicable laws.

Environmental Health and Safety Principles

Health and Safety

A&E's policy is to follow all federal, provincial, state, and local laws regarding workplace health and safety. A&E associates are responsible for compliance with all health and safety rules, regulations, and for continually practicing safety while performing his or her duties. A&E is committed to providing reasonable safeguards to ensure safe working conditions; maintaining all equipment, tools and machines in good repair; and studying, developing and training associates in safe work methods. In addition, A&E prohibits the possession of firearms or weapons on A&E property.

A&E personnel who violate these laws may not only cause harm to themselves, but to others. Any suspected violations of the safety procedures or any safety concerns should be immediately reported to your supervisor so that they can be appropriately addressed.

Environmental Principles

It is A&E's policy to conduct our operations in such a manner as to protect the environment. At a minimum, this means that A&E will comply with all applicable laws and regulations in each country in which we operate. If local environmental laws and regulations are not in existence or are less stringent, A&E's International Environmental, Health and Safety policies and standards will be followed.

Companies often establish worldwide environmental, health and safety standards that they require their suppliers to meet. Our Environmental, Health and Safety policies and procedures are designed to meet or exceed such standards implemented by A&E's customers.

A&E believes that a safe and healthy environment is the obligation of every citizen and every responsible enterprise and that means A&E should play a leadership role in protecting the environment for this generation and for generations to come. A&E's commitment to the environment is expressed by expenditures for equipment and programs to ensure that by-products of the manufacturing process do not adversely affect the air, land or water.

A&E believes that one of the most critical environmental problems is solid waste, which accumulates in landfills, and that we must work towards the ultimate goal of "Zero Waste," the virtual elimination of using landfills.

A&E is committed to working with our customers to encourage them to purchase and accept products that have recyclable packaging and with our suppliers to design products and product packaging that may be recycled.

A&E is committed to encouraging our communities, families and associates to conserve our natural resources and better protect the environment in their daily lives.

Your Responsibilities

- Know the A&E environmental policies.
- Identify any areas where A&E may be able to better its environmental principles.
- Bring any inaccurate environmental reporting or any environmental issues to the attention of A&E management.



Integrity of A&E Information and Property

Rules To Safeguard Company Resources and Assets

Confidential Information

The company has a significant investment in valuable confidential information used in its everyday business. The company will protect that investment through procedures designed to prevent the unauthorized disclosure of confidential information.

A&E's policy is to ensure that the operations, activities, and business affairs of A&E, our customers and our suppliers are kept confidential to the greatest possible extent. If, during their employment, A&E personnel acquire confidential information about A&E, its customers or its suppliers, such information is to be handled in strict confidence and is not to be discussed with outsiders. Associates are also responsible for the internal security of such information. Confidential information is information that belongs to A&E and is not publicly known, including but not limited to the following:

- A&E's business plans
- Pricing information
- Forecasts
- Market analyses
- Training materials
- Technical manuals
- Sales data
- Personnel/payroll information
- Production information
- Procurement information
- Service and quality performance
- Manufacturing specifications and processes
- Manufacturing cost and productivity information
- Testing methods
- Vendor certification data
- Personal health information

Such information also includes any information provided to A&E personnel with the express direction that it be kept confidential. In general, confidential information may not be

divulged without express permission to anyone except others authorized to have the information.

In addition to confidential information belonging to A&E, A&E personnel are required to protect the non-public, confidential information of customers, suppliers, and A&E's business partners that is provided to A&E in conjunction with its business relationships. Such information may include customers' manufacturing and production data or suppliers' pricing information. In general, A&E assures these parties that it will protect the confidentiality of such information, and associates shall not disclose it to external parties without express written permission from the President of A&E, A&E's Corporate Senior Vice Presidents, or other direct reports to the President of A&E.

Any associate found to be violating this policy is subject to disciplinary action, up to and including dismissal, and may also be subject to civil or criminal penalties for violations of, among other things, applicable securities law.

Accuracy of Financial Reporting and Record Keeping

A&E's policy is to make full, fair, accurate, timely, and understandable disclosure in reports and documents that it releases to the public or files with regulatory agencies. A&E's policy has been and continues to be that all transactions be accurately reflected in its books and records. Further, A&E's policy is that all books and records and bank accounts or other repositories of assets of A&E shall be subject to all normal accounting and auditing controls, and the falsification of any of its books and records or the maintenance of any secret bank accounts or repositories is strictly prohibited. A&E requires honest and accurate recording and reporting of information in order to make responsible business decisions. Records should be retained or destroyed only according to A&E record retention policies.

Company Resources and Intellectual Property

A&E's intellectual property is a valuable asset. The company name and logo represent A&E, and improper use could result in adverse publicity or economic consequences to the company. In addition, the company must ensure that adequate standards are met for any product bearing the company name. A&E also has the exclusive right under federal law and some foreign laws to make, use or sell patented inventions and distribute copies of copyrighted materials. Enforcement of these rights is an important step in maintaining the competitive advantages A&E enjoys. In addition, A&E owns all inventions, discoveries, ideas, and trade secrets created by A&E personnel on the job or produced using company resources.

To conduct company business, A&E operates various electronic systems including but not limited to: telephones, cellular phones, pagers, voicemail facilities, A&E-supplied personal computers, PDAs (Personal Digital Assistant), laptops, fax machines, modems, and servers and A&E-supplied e-mail and Internet access. Use of these systems is subject to specific A&E policies and at no time are A&E personnel to use these tools in a derogatory, offensive, disruptive, or unethical manner, or in violation of any A&E policy or applicable law.

Communications with the Government

A&E's policy is to cooperate with governmental agencies in the proper performance of their functions, but it is extremely important that responses to governmental investigations be coordinated within A&E. Requests for information or inquiries received from federal, state, local or municipal government authorities (other than routine requests) are to be noted by the receiving individual and referred immediately to the A&E Corporate Legal Department, with any appropriate comments. The A&E Corporate Legal Department is responsible for acknowledging receipt of all non-routine requests and for initiating appropriate action for timely compliance.

Communications with the Public

Only individuals designated by the President of A&E are authorized to speak on behalf of A&E to news media, analysts, or the general public. A&E makes every effort to provide clear and accurate communications to the news media and general public to ensure that it retains integrity in A&E's relationship with the public. If contacted by the news media, analysts, or other persons asking questions, all A&E personnel should refer such persons to the Corporate Vice President—Human Resources for a response.



An Enduring Commitment

Quality, Service, Value, & Integrity.
There Is a Difference.

Everyone at A&E is responsible for acting in an ethical manner, fulfilling their duties, and taking responsibility for their actions. Our values and policies are global in scope and it is necessary for all of us to take the time to fully understand and apply these values and policies. A&E's management understands the challenge this presents to each and every one of us, but the success of our company depends upon our integrity in the marketplace, in our relationships with each other, and in our relationships in the community.

A&E will continue to monitor compliance with this Global Code of Conduct in addition to its other policies and procedures. This will include compliance training for A&E personnel around the world as the Ethics Committee deems necessary. Furthermore, A&E may conduct audits on the implementation of and compliance with its policies and procedures that have regulatory or United States securities law compliance implications.



Associate Confirmation

Please return to your local Human Resource manager or the General Manager of your location (to be retained in your associate employment file).

I have received a copy of the Global Code of Conduct of A&E. I understand the standards of conduct described in it that apply to my job and agree to comply with them.

Signature _____

Print Name _____

Date _____

Department _____

Location _____

