



When in doubt,
remember Warren
Buffett's rule of thumb:

"... I want employees to ask themselves whether they are willing to have any contemplated act appear the next day on the front page of their local newspaper – to be read by their spouses, children and friends – with the reporting done by an informed and critical reporter."

CTB Core Values

Integrity in all things

Profitability is a must

People make the difference

Customers are why we exist

Excellence in all we do

Ways to Report Illegal or Unethical Conduct:

1. Talk to your supervisor or another member of management.
2. Contact CTB at 574-658-4191, and talk to the Director of Human Resources or the Legal Department. You may also contact the Legal Department via e-mail at legal@ctbinc.com.
3. Where you are unable or uncomfortable using the above reporting methods, contact Global Compliance at 800-261-8651 (U.S. and Canada) or +001 704 752 9679 (all other countries) or online at www.brk-hotline.com.



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A BERKSHIRE HATHAWAY COMPANY

CTB Pocket Guide to Ethics and Business Conduct



- **Integrity in All Things**
- **What Is Expected of You**
- **How to Report Illegal or Unethical Conduct**

Integrity in All Things

All CTB personnel and third parties doing business with CTB ("Individuals") are expected to conduct themselves in accordance with the highest legal, moral and ethical standards. These standards require observing all local, state, national and foreign laws that apply to CTB's business, as well as abiding by all CTB policies and procedures.

This pamphlet serves as a brief reference guide to policies addressed more thoroughly in CTB's Code of Business Conduct and Ethics ("Code"). This pamphlet does not replace the Code, and individuals are responsible for being familiar with the Code and promoting CTB values, standards of conduct and the policies and guidelines which affect their employment responsibilities. Copies of the Code may be obtained on our Web site or through the CTB Human Resources Department.

Any Individual with information about illegal or unethical behavior has a responsibility to promptly report such information.



What Is Expected of You

An Individual found in violation of the Code is subject to discipline, up to and including dismissal, contract termination and/or (where appropriate) legal prosecution by CTB and/or governmental or other entities.

The following conduct is **prohibited**:

- Being under the influence of, using and/or being in possession of alcohol and/or illegal drugs on CTB property.
- Theft, fraud, embezzlement, misappropriation and/or conversion of CTB property.
- Bribery.
- Falsification of documents.
- Destruction of documents (except where authorized by CTB policy).
- Disclosure of confidential information (except where legally authorized).
- Misuse, disclosure or distribution of proprietary information of CTB or others.
- Failure to use safety procedures and equipment.
- Harassment and/or violence toward others.
- Discrimination of a member of a protected class under applicable U.S., state or local law.
- Misuse or abuse of CTB resources.
- Conflicts of interest.
- Noncompliance with antitrust, competition and/or securities laws.
- Dishonesty, abuse of privileged information, misrepresentation of facts or any other unfair practices.

All individuals should behave at all times in a manner that reflects the spirit and intent of CTB's policies and values.

Examples of Illegal and Unethical Behavior

- An Individual provides someone with money (or some other benefit) in order to gain an unfair business advantage.
- An Individual uses the CTB network to view inappropriate websites.
- An Individual overstates the number of hours they worked on their CTB time sheet.
- An Individual tells a joke and/or makes a comment which is offensive to others due to its sexual and/or racial nature.
- An Individual does not follow CTB lock-out/tag-out procedures.
- An Individual sells a CTB product into a country in violation of U.S. embargo laws.
- An Individual submits a CTB expense report for items that they never purchased.
- An Individual takes office supplies belonging to CTB home with them for personal use.
- An Individual participates in a business transaction on behalf of CTB, where the Individual's family relationships and/or activities outside of CTB create an appearance of impropriety.
- An Individual engages in actions and/or makes verbal statements toward someone which could reasonably cause that person to feel threatened, put down and/or make for a hostile work environment.