



COMPLIANCE & ETHICS

BUSINESS PRACTICES POLICY

ADA TECHNOLOGIES INC.



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The ATI Philosophy

ATI is recognized as a world-class manufacturer of change control systems. Our good reputation is based on more than building high quality products for a reasonable price. Thousands of us from all walks of life and from around the world share a common direction: we do the right things the right way.

From the beginning, ATI's philosophy has emphasized the obligations we have to our customers, suppliers, and communities, to society and to each other. We will always conduct business lawfully and honestly. *Safety, quality, integrity* and *respect* aren't just words at ATI – they are the way we work.



“THIS COMPLIANCE
& ETHICS
BUSINESS
PRACTICES POLICY
IS A GUIDE TO THE
ETHICAL AND LEGAL
RESPONSIBILITIES
OF ATI
ASSOCIATES.”

Purpose

This Compliance & Ethics Business Practices Policy is a guide to the ethical and legal responsibilities of ATI associates. The *Policy* is not a comprehensive rulebook. Some of the responsibilities discussed in this *Policy* may also be discussed in other ATI materials, e.g. Associate Handbook, Administration policies and other applicable department policies and procedures.

Responsibilities

No policy or handbook can guaranteed good, ethical behavior. But each of us can comply with these policies by making it our fundamental responsibility to always do the right thing the right way:

- Always act in accordance with the law, this *Policy* and other ATI policies.
- Treat fellow associates, customers, competitors, suppliers and community members with the respect and fairness that you would like shown to you.
- Report any conduct that may violate the law or this *Policy* to your supervisor, Human Resources or to the Corporate Governance Business Office.

Responsibilities (Cont'd)

- Cooperate fully in any ATI investigations.

Meeting these requirements is vital to ATI's success. Therefore, violations of our policies or the law may lead to discipline, up to and including separation of employment.

Retaliation against anyone for making a good-faith report is a violation of this policy and our expectation of respect for the individual. This type of action will not be tolerated.

ATI's reputation is built one customer at a time, one person at a time and one action at a time. In the end, the reputation and success of our company.

Leadership Has Additional Responsibilities

If you supervise others or lead a team, you are expected to provide leadership to assure compliance in your area of responsibility. You must act ethically and communicate, formally and informally, ATI's high ethical standards to all those reporting to you. ATI leaders must make every effort to ensure that ATI's standards are being upheld and that associates report any violation of the *Compliance & Ethics Business Practices Policy*.

Walking the Talk

The words in this *Policy* are empty promises if they are not lived up to by each of us and enforced consistently throughout the company. Since prevention is the best way to minimize problems associated with unethical or illegal conduct, ATI provides periodic training in ethical and legal responsibilities. ATI also may evaluate an associate's adherence to this *Policy* during the annual performance appraisal process.

We recognize that sometimes people make mistakes. If you make a mistake, promptly disclose the error to your leadership. Covering up a mistake only makes the situation worse and would be a serious violation of ATI policy.

ATI is committed to promptly investigating allegations of unethical or illegal conduct.

If allegations involve you, you are expected to cooperate fully and to tell the truth. You will have the opportunity to tell your side of the story. If you violate this *Policy*, you are subject to discipline, up to and including separation from the company.



WHETHER YOUR CONCERN IS ABOUT PEOPLE ISSUES, ACCOUNTING PRACTICES, SAFETY PROCESSES, ENVIRONMENTAL HAZARDS OR ANY OTHER POSSIBLE VIOLATION OF LAW OR POLICY, YOU ARE OBLIGED TO REPORT IT. YOU DON'T NEED TO HAVE ALL THE FACTS, BUT WE DO EXPECT THAT THE INFORMATION YOU PROVIDE IS TRUTHFUL.

You & Your Fellow Associates

Respect for the Individual

ATI demonstrates *Respect for the Individual* in many ways. One important way is by providing equal employment opportunities for all. ATI makes employment decisions without regard to race, color, gender, age, religion, national origin, ancestry, citizenship, disability, veteran status, sexual orientation, social or economic status, or educational background.

Respect also means that ATI recognizes and values the unique talents of all associates. Valuing diversity leads to a more inclusive, productive, and respectful work environment.

Personal Information

ATI demonstrates *Respect for the Individual* by protecting the personal information of associates. Information such as addresses, home phone numbers, salary, medical information, and performance appraisals are private. This information should never be shared with anyone who does not have an appropriate business reason for receiving it.

“ATI’S PHILOSOPHY OF “RESPECT FOR THE INDIVIDUAL” IS BASED ON THE BELIEF THAT THE HUMAN BEING—REGARDLESS OF CULTURE OR BACKGROUND—IS ATI’S MOST IMPORTANT ASSET.”



Equal Employment

ATI is an equal opportunity employer and is committed to an environment free from discrimination. It is the policy of the Company and the responsibility of every associate to treat our colleagues fairly. ATI makes employment decisions without regard to race, color, gender, age, religion, national origin, ancestry, citizenship, disability, veteran status, sexual orientation, social or economic status, or educational background.

Non-Harassment

ATI’s philosophy of “Respect for the Individual” is based on the belief that the human being – regardless of culture or background – is ATI’s most important asset. ATi believes the diversity of its workforce is a source of strength, and harassment of any kind undermines this principle.

Non-Harassment (Cont'd)

Harassment can take many forms, all of them unacceptable. Some examples are:

- Jokes, insults, threats and other unwelcome actions concerning a person's race, color, gender, age, religion, national origin, ancestry, citizenship, disability, military status, sexual orientation, social or economic status, or educational background.
- Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature.
- Verbal or physical conduct that disrupts another's work performance or creates an intimidating or hostile work environment.

If you experience or observe workplace harassment, report the incident to your senior lead, administration, manager or senior manager.

Safe, Secure & Healthy Work Environment

Safety of ATI associates and the safe operation of equipment has to be the first consideration in the operation of our business. All associates, without exception, are responsible for ensuring that all ATI operations are conducted safely. Associates are expected to observe all safety rules and practices, to follow instructions concerning safe and efficient work practices. Participate in safety training, comply with all relevant safety codes, regulations, standards and policies, and promptly report any safety concerns, including accidents, injuries and unsafe conditions. Make safety a priority in everything you do.

Possessing or using alcohol or illegal drugs at work, or reporting to work under their influence, is strictly prohibited. It is dangerous to you and an obvious threat to a safe workplace. Violence or the threat of violence, including bringing a weapon on Ada Technologies Inc. premises, is also prohibited. To keep ATI safe and secure for everyone, you are responsible for promptly reporting any threats of violence.

Compensation

Ada Technologies Inc. is committed to paying associates fairly. Managers are responsible for ensuring that associates receive appropriate compensation for time spent working for ATI. You are accountable to accurately record the time you work, and will be compensated based on this information, managements approval, and according to ATI policy.

 A COUPLE OF THINGS THAT WE DO IN MY AREA BOTHER ME BECAUSE THEY DON'T SEEM TOO SAFE. THE PROBLEM IS THAT I DON'T WANT TO BRING THEM UP BECAUSE I'M PRETTY NEW HERE, AND DON'T WANT TO BE A TROUBLEMAKER.

 DISCUSS YOUR CONCERNS WITH YOUR LEAD, SR. LEAD, COORDINATOR, MANAGER OR SAFETY COORDINATOR. THERE MAY BE VERY GOOD REASONS FOR THE PRACTICES. ON THE OTHER HAND, SOMETIMES NEW EYES SEE THINGS MORE EXPERIENCED EYES HAVE MISSED. RAISING A CONCERN FOR SAFETY IS NOT MAKING TROUBLE, IT IS SHOWING YOU CARE.

You & Your Fellow Associates

Employment Laws

We will comply with laws that apply to our associates, no matter where they are located. Applicable employment laws include immigration laws, the Americans with Disabilities Act, the Family and Medical Leave Act, the Ohio Worker's Compensation Act, the Fair Labor Standards Act and Equal Employment Opportunity laws and regulations.

You, ATI & Our Customers

ATI Assets

ATI has invested in people, equipments and knowledge in order to manufacture world-class transmission change control lever and engine parts for automobiles, motorcycles and general purpose engines. Properly care for these and all other Ada Technologies Inc. assets as if they were your own.

IN ALL AREAS OF ATI
OPERATIONS, WE
OBSERVE THE
FOLLOWING PRIORITIES:

- SAFETY
- QUALITY
- DELIVER
- ENVIRONMENT
- MORALE
- COST

Government Customers

Ada Technologies Inc. treats its customers, including the federal, state and local governments, with honesty and fairness. ATI complies with government procurement laws and regulations.

If you work with government officials and contracts, you are responsible for knowing and complying with all applicable laws and regulations. For example, many government officials are prohibited from receiving gifts, entertainment and travel. Government regulations also apply to the hiring of current, or recently retired, officials and their families. Avoid any conduct that may be viewed as improperly influencing the objective decision-making of government officials. If you aren't sure, ask.

Product Safety & Quality

Our reputation is riding on the safety and quality of every product we make. Put quality into everything you do, and let you supervisor know of any product or process that does not meet ATI's quality or safety standards. Never attempt to conceal substandard work or products. As you think about product safety and quality, remember that people you care about use our products.

Supplier & Vendor Relations

Building strong relationships with suppliers and vendors is a big part of building high quality parts. ATI treats its business partners and prospective suppliers fairly. We expect them to treat us the same way.

If you are involved in purchasing activities, make decisions based on sound business reasons, such as suitability, diversity, quality, delivery and cost. Purchasing arrangements should be properly documented, and should clearly identify the services or products to be provided, price and payment terms. There are many potential pitfalls in identifying potential suppliers and negotiation contracts.

Conflict of Interest

All ATI associates, officers and directors have a duty to act professionally and make business decisions based solely on the best interests of ATI. A conflict of interest occurs if you allow the possibility of personal gain or influence, or appear to influence, the conduct of ATI business. Examples of situations that may cause a conflict of interest are listed below:

- Purchasing goods or services that result in direct or indirect compensation to you or a member of your family.
- Accepting gifts / entertainment from a supplier or competitor.
- Working or consulting for any ATI supplier or competitor.
- Receiving compensation of any kind, including loans, payments or subsidies, from a supplier or competitor.
- Accepting gifts of more than nominal value (Policy limit of \$50), or entertainment that is lavish or unreasonable in the business relationship (Policy limit of \$100).



You & Outside Business



MY SISTER-IN-LAW HAS A REALLY GOOD

CATERING SERVICE.

SHE SAYS SHE CAN GIVE ME A SPECIAL DEAL FOR ATI EVENTS. CAN I USE HER FIRM?



BECAUSE THIS COULD EASILY APPEAR TO BE A

CONFLICT OF INTEREST, OR FAVORITISM, YOU SHOULD RECEIVE THE ADVANCE APPROVAL OF SENIOR MANAGEMENT OR THE CORPORATE GOVERNANCE BUSINESS OFFICE.

Q I WAS OFFERED A REALLY NICE PEN BY A SUPPLIER AS A HOLIDAY GIFT. I'VE SEEN PENS LIKE IT AT THE MALL FOR AROUND \$100. CAN I KEEP IT?

A WE DON'T MEAN TO ACT LIKE A GRINCH, BUT ACCEPTING AN EXPENSIVE GIFT CAN SEND THE WRONG MESSAGE TO SUPPLIERS AND FELLOW ASSOCIATES. ACCEPTING GIFTS OF MORE THAN A NOMINAL VALUE MAY CAUSE A CONFLICT OF INTEREST THAT SHOULD BE AVOIDED. NOTIFY YOUR MANAGER ABOUT THE PEN, AND SEND IT BACK WITH A NOTE EXPLAINING OUR POLICY. HOWEVER, AN INEXPENSIVE PEN WITH THE SUPPLIER'S NAME ON IT IS OF NOMINAL VALUE AND IS ALLOWED.

Conflict of Interest (Cont'd.)

- Accepting special services or discounts from supplier or competitors, unless these services or discounts are made publicly available to all ATI associates.
- Owning a significant interest in a competitor, supplier, a company that seeks to become a supplier.
- Disclosing information learned through your employment at ATI that could benefit or influence the stock price of an ATI competitor or supplier.

Even the appearance of conflict can be damaging to you, ATI, and our business partners. You should refuse any lavish or frequent gifts, favors or entertainment. You should also inform the supplier of ATI's policy in this area. Any situation that may appear to be a conflict of interest must be reviewed by Corporate Governance Business Office. If you're ever in doubt, disclose.

Providing Gifts & Entertainment



AT ATI, we pride ourselves on building strong relationships with suppliers and customers. At times it may be appropriate to provide a modest gift or entertainment to a business partner. Any gift or entertainment provided must be legal, in support of a valid business purpose, and in accord with the company policy of the recipient. It must also be modest enough that it could be made public without embarrassing either ATI or the recipient. Gifts and entertainment must be accurately recorded in ATI's financial records.

Community Responsibility

ATI wants to be viewed as a good corporate citizen. Good citizenship starts with obeying the law, but it goes much further. ATI provides good jobs and quality products. We support numerous diverse community and charitable organizations. Many ATI associates participate in and lead charitable and volunteer activities. Use of ATI resources to advance charitable goals must be approved by management.

Environmental Protection

Protecting the environment is an obligation of ATI's corporate citizenship. It is ATI policy to comply with all environmental laws, go beyond legal requirements where appropriate and seek ways to minimize environmental impact.

Each associate has a role in protecting the environment and is expected to perform their job in accordance with the environmental requirements for that job. For example, you are expected to understand and comply with ATI procedures relating to the handling, packaging and transporting of hazardous materials. Each associate is also expected to minimize energy

Political Activities

ATI encourages associates to exercise their right to vote and participate in the political process. If you are involved in politics, please be sure that you express your view as an individual, not as a representative of ATI. Any Political activities or donations must be on your own time and at your own expense.

Like all responsible citizens, ATI may participate in the political process. However, corporate political participation is highly regulated. For example, ATI may not provide donations or any other "in-kind" support to candidates for federal, state or local government offices. If you have contacts the government officials, please make sure you consult with Administrations Department for guidance in this area.



*You, Our
Communities
& the
Environment*

A FRIEND OF
Q MINE IS
 RUNNING FOR
 MAYOR, AND I'D LIKE TO
 HELP OUT IN HIS
 CAMPAIGN. THERE'S NO
 PROBLEM WITH THIS,
 RIGHT?

RIGHT. YOUR
A PERSONAL
 SUPPORT IS YOUR
 PERSONAL BUSINESS.
 JUST MAKE SURE THAT
 YOU DON'T USE ATI
 ASSETS, INCLUDING THE
 ATI NAME, TO ADVANCE
 THE CAMPAIGN.

Confidential Information



HOW DO I
KNOW IF
SOMETHING IS
CONFIDENTIAL?

ATI's continued success depends on developing knowledge and using it to improve the business. Any knowledge that is known only to ATI, gives ATI a competitive advantage, or has been entrusted to ATI by a business partner is confidential information that must be protected. Examples include research and development plans or ideas, design drawings or specifications, manufacturing methods, financial data, pricing, computer programs and any other sensitive information.



SOMETIMES
THIS
INFORMATION IS
MARKED, BUT OFTEN IT'S
NOT. IF THE
INFORMATION MIGHT BE
OF USE TO OTHERS AND
COULD HARM ATI'S
COMPETITIVE POSITION,
IT IS PROBABLY
CONFIDENTIAL. IF
YOU'RE UNSURE,
IMMEDIATELY CONTACT
A MEMBER OF
ADMINISTRATIONS OR
THE CORPORATE
GOVERNANCE
BUSINESS OFFICE.

You have an obligation to safeguard confidential information by:

- Keeping it secure, locking cabinets and desks, and protecting sensitive documents with passwords;
- Discussing it only with other ATI associates who have a need to know in order to do their job;
- Not discussing it in public;
- Disclosing it outside ATI only if you have the required permission to do so and the party receiving the information as signed a ATI confidentiality agreement;
- Consulting with a member of ATI's Sr. Management team if you know of any developments that may be eligible for protection by patent, copyright or trademark; and, or
- Complying with ATI'S policies and procedures regarding confidential information.

When your ATI employment ends, your obligation to protect ATI's confidential information continues and all of ATI's property and documents held by you must be returned to ATI.

Insider Trading

The law prohibits buying or selling of company's stock when you know material, non-public information about that company. Material information is that which could influence a reasonable investor to buy or sell stock.



Insider Trading (Cont'd.)

Associates aware of material, non-public information relating to Ada Technologies Inc., or Atsumitec, or companies with whom Ada Technologies does business may not directly or through friends or family:

- Buy or sell stock until that information is made public by the company; and / or
- Pass information on to others, including other Ada Technologies

Information Assets of Other Companies

Ada Technologies Inc. never uses illegal or unethical methods to gather information about other companies. We respect their proprietary rights, including their patents, copyrights and trademarks. Stealing another company's confidential information, or possessing or using it without their consent, is prohibited. Persuading past or present employees of other companies to disclose their company's secrets also is prohibited. If you receive information that may be another company's confidential information or if you have questions about the legality of how you are gathering information consult the Corporate Governance Business Office.

Business Records & Communications

All records, reports and documents must be complete and accurate. Never make false or misleading entries, statements or alterations in record, whether it relates to financial data; business data such as safety, quality and personnel files; or any other kind of information. Always follow our internal controls and record retention policies.

Ada Technologies Inc. submissions to government entities are complete, clear and accurate, and are never misleading. ATI does not attempt to hide expenditures, and does not establish and undisclosed or unrecorded funds, assets or liabilities.

Business records and communications may become known to the public through litigation, government investigations and the media. Accordingly, in you written and oral business communications, it's important to tell the truth, and to avoid exaggeration inappropriate language, and derogatory remarks or characterizations. This applies to communications of all kinds, including e-mail, voice mail, daily planner notes, and other "informal" notes or memos.

 I LOVE E-MAIL.
NOT ONLY DOES
IT ALLOW ME TO
DO MY WORK MORE
QUICKLY, BUT I AM ABLE
TO KEEP UP WITH THE
LATEST JOKES. THIS IS
OK, ISN'T IT?

 WHILE HUMOR
IS IMPORTANT
TO OUR WORK AND OUR
LIVES, REMEMBER THAT
THE E-MAIL SYSTEM IS A
BUSINESS TOOL. JOKES
AND COMMENTS THAT
MAY BE OFFENSIVE TO
OTHERS HAVE NO PLACE
AT ATI, WHETHER
THEY'RE DELIVERED BY
E-MAIL OR IN PERSON.

Government Requests & Investigations

Q WHAT SHOULD I DO IF I BELIEVE THAT SOME OF THE THINGS GOING ON IN MY PLANT ARE WRONG, AND MAYBE EVEN ILLEGAL? I DON'T WANT TO GET ANYBODY—INCLUDING ME—IN TROUBLE FOR REPORTING THIS.

Governmental agencies sometimes request information from ATI, and it is always possible that such agencies may make detailed inquiries into ATI affairs. Always be truthful and appropriately responsive to governmental requests for information, including request made during investigations.

If you receive a non-routine request for ATI information from a government agency or attorney immediately notify the Administrations Department before responding. This helps to ensure that ATI's response is appropriate both for the company and under the law. If you are in doubt whether the request is routine, always refer it to the Administrations Department.

Never alter, conceal or destroy documents or records if they have been requested by a government agency, or it the likely to be requested in connection with an investigation. And, of course, never lie or mislead any government representative and don't try to influence others to lie or mislead.

Litigation & Claims

A WHILE THIS MAY BE VERY DIFFICULT FOR YOU, YOU OWE IT TO YOURSELF AND ATI TO LET SOMEBODY KNOW WHAT'S GOING ON. TALK TO A MANAGER OR THE CORPORATE GOVERNANCE OFFICE. RETALIATION AGAINST ANY ASSOCIATE WHO HONESTLY REPORTS A CONCERN ABOUT ILLEGAL OR UNETHICAL CONDUCT WILL SIMPLY NOT BE TOLERATED AT ATI.



Like all large businesses, Ada Technologies Inc. is sometimes involved in disputes that may result in claims or litigation. If you receive a legal document related to ATI, such as a summons, complaint, subpoena or discovery request, you must immediately contact the Administrations Department to ensure an appropriate and timely legal response. Don't respond to any request, answer questions or produce documents without first discussing the situation with the Administrations Department.

Under no circumstances should you ever threaten or initiate legal action on behalf of ATI without the prior advice of the Administrations Department and approval from Senior Management.

Media Requests

Ada Technologies Inc. values its relationships with the media. We attempt to promptly disclose major developments and events in a timely fashion. To ensure professional and consistent handling, all inquiries from the media need to be promptly referred to the Administrations Department.

Compliance With All Laws

Ada Technologies Inc. follows all applicable laws and regulations. No excuse or pressure can justify breaking the law nor may a consultant or contractor be used to do something prohibited by law or Ada Technologies Inc. policy.

This booklet references many laws as well as many ATI standards that go beyond legal minimums. This is obviously not an exhaustive list. Below are several laws not described elsewhere in this booklet that you should be aware of. Contact the Administrations Department if you find yourself in a situation where you are unsure of your responsibilities under the law.

Antitrust

ATI supports free and open competition, as well as the antitrust laws intended to promote competition. Antitrust laws prohibited, among other things, agreeing with competitors to limit production, fix prices or divide markets, customers or territories. They also may govern exclusive purchasing or sales agreements with suppliers and customers.

Anti-Corruption Laws

ATI abides by all laws that prohibit bribes and offers of bribes to government officials. You may not make payments to agents or any other representative of ATI if you have

Customs & International Trade

When importing or exporting products, information or technology, ATI will comply with applicable U.S. and other national laws, regulations and restrictions. This includes compliance with all applicable tax and tariff laws and regulations. ATI also works in close partnership with the government to



You & the Law

Q THERE ARE SO MANY LAWS AND REGULATIONS—HOW AM I SUPPOSED TO KNOW THEM ALL? I'M NOT A LAWYER.

A OF COURSE YOU'RE NOT EXPECTED TO KNOW ALL LAWS AND REGULATIONS. NO ONE DOES. THAT'S WHY YOUR CONSCIENCE AND THIS POLICY ARE THE PLACES TO START. IF AN ACTION DOESN'T SEEM RIGHT TO YOU, OR IS IN A GRAY AREA, GET HELP. TALK TO YOUR LEAD OR THE CORPORATE GOVERNANCE OFFICE.

Questions & Concerns

ATI believes that every individual can make a difference. According to the Ada Technologies Inc. Philosophy, you are expected to go to the spot, address problems personally, face reality and report information directly to those concerned. This philosophy applies to ethical and legal issues just like all other issues. If you're ever concerned with the ethical or legal consequences of an action, address it professionally by using your own good judgment, this Policy, other ATI policies and the advice of appropriate ATI associates.



If the right course of action is unclear, or if you have observed an unethical or illegal act, you are obligated to talk to your supervisor, or other appropriate ATI management. Retaliation against an associate who reports a concern will not be tolerated. Keep in mind that making a report that you know is false is also a violation of this policy.

Our Expectations

- Respect* - We will respect each other at all times and in all circumstances, even under stress. Respect is at the foundation of every good partnership.
- Objectivity* - Our associates are required to make decisions based on the best interests of the company, not personal gain. Associates should never solicit a supplier for gifts, favors, or donations. Suppliers are asked to not offer ATI associates any gift over \$100, or anything that could be perceived as a conflict of interest.
- Confidentiality* - ATI associates are expected to honor all agreements and maintain the confidentiality requirements of ATI and of our suppliers and customers. Similarly, we expect our suppliers to honor all agreements regarding ATI's confidential information.
- Quality & Improvement* - We must work hard in partnership to improve the quality of our products, processes and relationships for the benefit of our customers and our mutual success.
- Communication* - We should communicate with each other openly, honestly and often. This is vital to addressing concerns as they arise and to preventing small issues from becoming large problems.

YOUR PART:

OUR GOOD REPUTATION IS
A VALUABLE ASSET AND
ALL OF US, ASSOCIATES
AND SUPPLIERS ALIKE,
HAVE AN IMPORTANT ROLE
IN MAINTAINING IT. EACH
OF US MUST LIVE UP TO
THESE EXPECTATIONS AND
DO THE RIGHT THING IN
ORDER TO MAINTAIN OUR
SPIRITED INDEPENDENCE.

IF YOU HAVE ANY
QUESTIONS OR CONCERNS
PLEASE DISCUSS THEM
IMMEDIATELY WITH YOUR
MANAGER OR A MEMBER
OF THE CORPORATE
GOVERNANCE OFFICE.

THERE IS A
COMMUNICATION BOX
LOCATED IN THE
CAFETERIA FOR
ANONYMITY.