



Business Ethics Policy

Orluck Industries is committed to lawful and ethical behavior in all of its activities and requires its employees, suppliers and sub-contractors to conduct themselves in a manner that complies with all applicable laws and regulations. Orluck Industries must both remain as and be understood to be a good community citizen and has set this policy as a guiding code of business ethics. These requirements will be flowed down to our suppliers via the general terms and conditions on every Purchase Order.

It is Orluck Industries' policy that the directors, officers, and employees will exercise and display good judgment and high ethical standards in all agency business. This is also applicable to all production, inspection and shipping operations carried out by Orluck's employees. It is expected that all data recorded and traveler signatures represent the truth as known or observed by the employee. Failure to comply with this clause will be cause for disciplinary action up to and including separation from the company.

Orluck Industries insists that its business be conducted in full compliance with all applicable local, state and federal laws and regulations and business contracts. Failure to obey laws, regulations and contracts violates this policy and may expose both the employee and Orluck Industries to criminal or civil prosecution. As employees conduct Orluck Industries business, employees may encounter a variety of legal issues. If an employee has a question on a specific law, regulation or other legal issues, the employee should contact the Orluck Industries attorney.

Orluck Industries management will ensure the integrity and accuracy of Orluck Industries financial statements, Orluck Industries compliance with all legal and regulatory requirements related to Orluck Industries financial statements

Orluck Industries respects the rights of its employees to engage in activities of a private nature outside of Orluck Industries. However, employment or personal business interests or commitments are prohibited if such activity would tend to impair an employee's ability to meet his or her regular job responsibilities to Orluck Industries or would affect his or her objectivity in carrying out his or her responsibilities.

Environment, Health & Safety

We strive to provide a safe and healthy company to work at while impacting the environment as minimally as possible. Through strong partnerships with employees, suppliers and customers, we work to continually improve our Environment, Health & Safety (EH&S) performance.

Safety:

Our goal is to provide our employees a very safe workplace. One way we achieve this goal is through our scheduled safety meetings and talks. We recognize, analyze and control hazards by implementing mistake proofing solutions.

Resolution:

If at any time a concern exists regarding the propriety or legality of any action contemplated to be taken or that has been taken by any Orluck Industries employee, contractor, or client, as the action relates to Orluck Industries, or if an action needs to be taken in order for the Orluck Industries to be in compliance with law or appropriate ethical standards, the employee can address the issue directly by going to the employee's supervisor. If the employee is not comfortable speaking to a manager or does not feel the issue has been properly addressed, the employee may contact the Orluck Ombudsman, Jeff Orluck. All complaints will be investigated promptly, typically within five (5) business days.

Under this policy, Orluck Industries will make every effort to ensure that the employee who reports illegal or improper activity or who participates in an investigation of improper conduct will not be subject to retaliation or reprisals. Efforts will be made to treat a report of unethical or illegal conduct as confidential, consistent with the need to investigate and prevent or correct the action. The individual making the report will not be discharged, threatened, harassed, or discriminated against for reporting in good faith what they perceive to be wrongdoing, violations of law, or unethical conduct.

All employees will be trained to this document upon their orientation. This training should be reviewed at least every two years thereafter.