

Atlas Pressed Metals Ethics Policy

Atlas Pressed Metals conducts its business fairly, impartially, in an ethical and proper manner, and in compliance with all laws and regulations.

(1) Atlas Pressed Metals is committed to conducting its business with integrity underlying all relationships, including those with citizens, customers, suppliers and communities, and among employees. The highest standards of ethical business conduct are required of Atlas Pressed Metals employees in the performance of their responsibilities. Employees will not engage in any conduct or activity that may raise questions as to the company's honesty, impartiality or reputation or otherwise cause embarrassment to the company. Employees will avoid any action, which might result in or reasonably be expected to create an appearance of:

- Using public office or public position for private gain.
- Giving preferential treatment to any person, supplier, customer or entity.
- Adversely affecting the confidence of the public in the integrity of the company.

(2) Every employee has the responsibility to ask questions, seek guidance, and report suspected violations and express concerns regarding compliance with this policy. Atlas Pressed Metals will maintain a program to communicate to employees its commitment to integrity and uncompromising values. The program will inform employees of policies and procedures regarding ethical business conduct and assist them in resolving questions and in reporting suspected violations. Retaliation against employees who use these reporting mechanisms to raise genuine concerns will not be tolerated.

(3) The HR department with input from top management is responsible for providing policy guidance to assist employees in complying with Atlas Pressed Metals expectations of ethical business conduct and uncompromising values. This policy constitutes the standards of ethical business conduct required of all employees. Managers are responsible for supporting their implementation and monitoring compliance.

(4) Receipt of gifts from or presentation of gifts to customers, suppliers, or vendors will be limited to promotional items, meals, and other traditional business gratuities such as tickets to sporting events. Cash gifts are not to be given or accepted by any Atlas personnel. The company President will make the final determination as to the appropriateness of questionable gifts.