

**TECT**

**BUSINESS  
CONDUCT  
GUIDELINES**



## VALUES

**Absolute Integrity** in our relationships with our customers, suppliers and all constituents.

A focus on **Serving and being the “First Choice”** of Our Customers by supplying quality products, delivered on time with superior customer support.

A commitment to a **Merit Based Workplace** that requires and rewards performance, provided opportunities for advancement, respects individuals, and encourages innovation.

A commitment to **Establish Challenging Goals and Commit Necessary Resources** to attain those goals.

A commitment to **Achieve our Goals in any Economic Environment.**

A commitment to **Continuous Improvement** in all areas of the organization.

An awareness of our **Social Responsibility** to maintain and promote business ethics, environmental health and safety awareness, and participation in community affairs.

It is essential to the future of TECT that each of us take personal responsibility for leadership regarding these principals and that we are always dedicated to continuous improvement.

In return we will have a culture that fosters a safe workplace, values diversity, encourages communication and respects innovation.

## TECT'S COMMITMENT TO INTEGRITY AND COMPLIANCE

Over the years, TECT has earned a solid reputation based on credibility and performance. We've earned that credibility not only because we have delivered "the numbers", but because we have conducted our business to high ethical standards. As we continue to build our reputation and move toward becoming truly world class, it is becoming increasingly important that we pay close attention not only to *what we do*, but *how we go about doing it*.

Any truly great company has an unshakable foundation of strategic and operational principles that guide its business. This foundation includes the way its people conduct business – how each employee makes decisions and executes the tasks of their daily jobs.

At TECT, we take our code of conduct very seriously. For without the foundation of honesty, integrity and compliance with the law, we will never be able to drive our Company to achieve its vision of being one of the best managed companies in the world, with global leadership positions in all our markets. Just as continuous improvement is a way of life at TECT, so is compliance.

The *TECT Business Conduct Guidelines* outline our Company's code of conduct, which applies to all TECT employees. They reflect the TECT Values and are a key resource to help each of us make responsible business decisions. In many cases, a violation of the *Guidelines* may be a violation of law, which could subject both the employee and TECT to civil and criminal penalties. Such violations could jeopardize our reputation with customers, suppliers, our communities and other key constituencies. As such, violations will not be tolerated and will be subject to disciplinary action which may include discharge.

As you can imagine, there are literally thousands of instances where ethical choices must be made. The *TECT Business Conduct Guidelines* do not give detailed guidance on every scenario, but provide overall standards of conduct and also cover many of the common situations that call for ethical judgment. Each of us should use common sense in applying the *Guidelines* to particular situations. If you need help determining the best course of action in a specific situation, or need clarification of any section of these *Guidelines*, ask for assistance from your ethics/compliance officer or corporate headquarters ethics/compliance officer.

Each TECT employee is to personally commit to following the *TECT Business Conduct Guidelines*. We take our corporate reputation very seriously. It's an asset that we must all protect. These *Guidelines* help us do just that.

Kenneth E. Glass, *Chairman and CEO*

## PERSONAL INTEGRITY

### STANDARDS OF BUSINESS CONDUCT

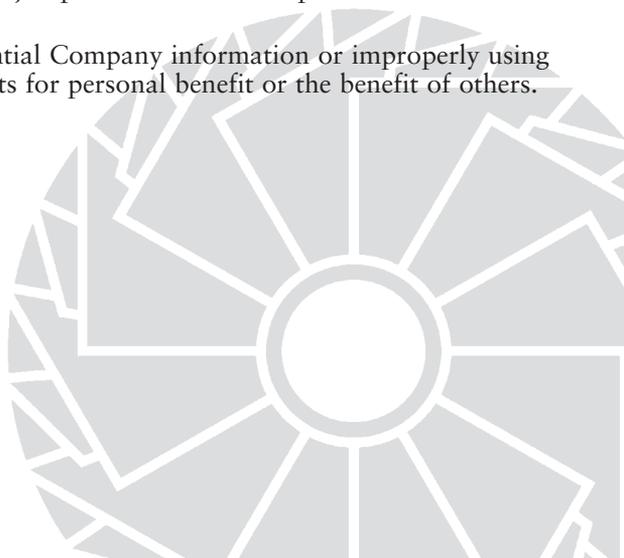
As TECT employees, we are expected to carry out the Company's business with honesty, integrity and high ethical standards. These standards should govern our conduct when making decisions which affect TECT.

### CONFLICTS OF INTEREST

TECT respects the right of all employees to engage in personal activities outside of work. However, each of us has the responsibility to avoid activities which conflict or appear to conflict with our job responsibilities or the interests of TECT. Any employee activity which may involve a conflict of interest or even the appearance of a conflict of interest must first be approved by the employee's direct supervisor with the assistance of the employee's ethics/compliance officer or corporate headquarters ethics/compliance officer.

The following are examples of conflicts of interest:

- Engaging in employment or any other activity that interferes with our ability to devote the required time and attention to our job responsibilities at TECT.
- Holding a significant financial interest in a current or prospective customer, supplier or competitor of TECT, or serving as an employee, consultant or director of that business.
- Directing TECT business to a supplier owned or managed by a relative.
- Supervising the job performance or compensation of a relative.
- Using confidential Company information or improperly using Company assets for personal benefit or the benefit of others.



## **PERSONAL INTEGRITY**

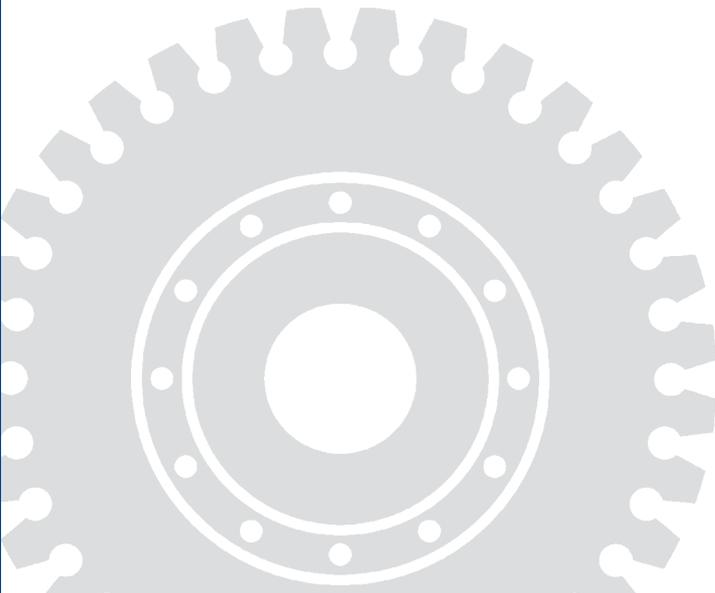
### **PROTECTION OF PROPERTY**

We must protect and safeguard Company property and the property of our customers, suppliers and business partners. This applies to property and assets of all kinds, including equipment, supplies and real estate, as well as proprietary business information.

Protection of non-public Company information is especially important. Unauthorized use or release of information regarding plans, strategies, costs or prices, pending contracts or unannounced products could jeopardize the Company's competitive position.

### **BUSINESS RECORDS**

Government agencies, customers and suppliers rely upon the integrity of our business records. All business records (for example, timecards, purchase orders, quality reports and financial records) must accurately reflect the transactions of the Company in accordance with all applicable requirements. We will not create or permit false or misleading entries to be made in the records of the Company under any circumstances.



# COMPANY, EMPLOYEE AND COMMUNITY RELATIONSHIPS

### EMPLOYEE RELATIONS

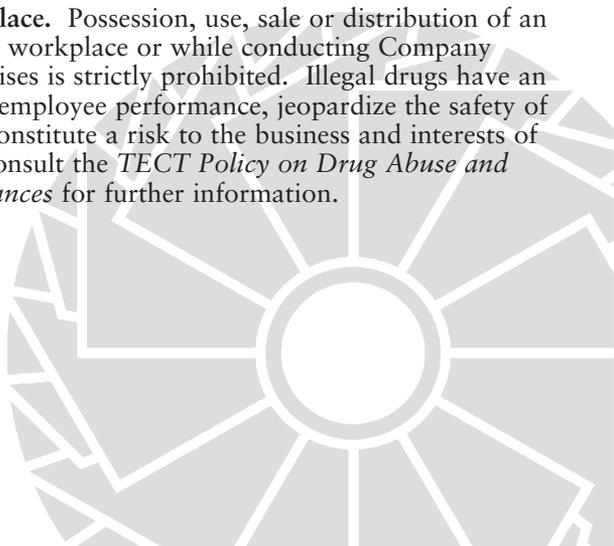
We are committed to equal opportunity in employment and to a work environment that recognizes and values employee diversity. Each of us is responsible for acting in a manner that will help TECT achieve the following goals:

**Equal Opportunity.** It is our policy to employ, train, promote and compensate individuals based on merit, job-related qualifications and abilities. TECT is committed to providing equal opportunity in employment regardless of race, color, religion, national origin, sex, age, sexual orientation, marital status, handicap, disability or status as a veteran.

**Diversity.** We value the differences among our employees. Individual differences enrich the workplace and improve our ability to attract employees and work with customers. A work environment which values individual differences and encourages the full contribution of every employee creates a stronger Company. TECT also remains committed to adherence with all immigration and naturalization regulations relating to employment, and utilizes appropriate employment practices in all of its locations to ensure compliance.

**No Harassment.** Any kind of harassment by or against our employees is prohibited. Sexual harassment is of special concern. Prohibited conduct includes the making of unwelcome sexual advances or engaging in any other conduct with sexual overtones which interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

**Drug Free Workplace.** Possession, use, sale or distribution of an illegal drug in the workplace or while conducting Company business off premises is strictly prohibited. Illegal drugs have an adverse effect on employee performance, jeopardize the safety of co-workers and constitute a risk to the business and interests of the Company. Consult the *TECT Policy on Drug Abuse and Controlled Substances* for further information.



## COMPANY, EMPLOYEE AND COMMUNITY RELATIONSHIPS

### ENVIRONMENTAL PROTECTION, HEALTH AND SAFETY

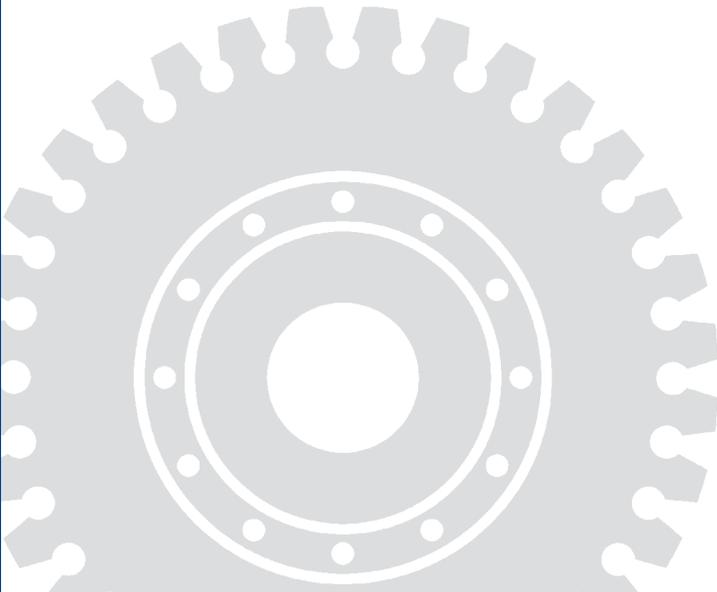
We are committed to being an environmentally responsible company and to providing a safe and healthful workplace for our employees.

We will comply with all applicable environmental, health and safety laws and regulations in every country in which TECT does business. Where there are no environmental, health or safety laws, or where the legal requirements do not adequately protect the environment or workplace, TECT will take appropriate action. Environmental, health and safety managers and corporate director of technical services are available to provide information on applicable laws and regulations.

### POLITICAL CONTRIBUTIONS AND ACTIVITIES

Contributions of Company funds or the use of Company assets or facilities for the benefit of political parties or candidates anywhere in the world is prohibited unless approved in advance by the TECT board of directors.

TECT encourages all employees to participate personally in the political process and to support political parties and candidates of their choice.



## RELATIONSHIPS WITH OTHER PARTIES

### GIFTS AND ENTERTAINMENT

TECT employees should not give or receive business gifts of more than nominal value, since such gifts can affect or might appear intended to affect the judgment of the person receiving the gift.

Where laws or Company policy do not provide otherwise, gifts having a value of U.S. \$50 or less are permitted. The giving or receiving of gifts of a value in excess of U.S. \$50 requires the approval of the President or other Corporate Officer. Any gifts which are not permitted or have not been approved should be declined or turned over to the Company.

The giving or receiving of reasonable and customary meals and entertainment in the normal course of business is permitted in instances where laws or Company policy do not provide otherwise.

Inappropriate entertainment should always be avoided.

TECT employees must know and comply with all applicable restrictions on providing meals, entertainment, gifts or gratuities to employees or agents of any government.

Questions about gifts or entertainment should be resolved by the employee's direct supervisor with the assistance of the employee's local ethics/compliance officer or Corporate ethics/compliance officer.

### IMPROPER PAYMENTS

Payment or acceptance of bribes, kickbacks or other improper payments while conducting TECT business is prohibited. This prohibition applies to dealings with current or potential customers, suppliers, representatives, consultants or other parties seeking to establish a business relationship with TECT.

### CUSTOMERS AND SUPPLIERS

We work to build strong business relationships with our customers and suppliers based on lawful, honest business practices and the best interests of TECT. We are committed to the pursuit of excellence in all of our products and services, and strive to meet or exceed our customers' expectations for quality, integrity, safety, delivery and reliability.

## RELATIONSHIPS WITH OTHER PARTIES

When we contract for goods and services on behalf of TECT, we should avoid doing anything that might compromise our objectivity or impair TECT's reputation. Our purchasing decisions should always be based on appropriate business criteria such as price, quality, technical leadership, reliability and the reputation of the supplier.

### REPRESENTATIVES

TECT's representatives are an extension of our Company and should be chosen and monitored carefully. When representatives are engaged in TECT business, they are required to comply with applicable laws and adhere to standards of business conduct consistent with the *TECT Business Conduct Guidelines*. The same requirements apply to our agents, consultants, dealers and distributors. The proposed appointment or termination by TECT of persons acting in connection with non-U.S. business is subject to requirements stated in the *Foreign Corrupt Practices Act*. The proposed appointment of certain U.S. consultants also is subject to approval.

### TRANSACTIONS WITH GOVERNMENTS

In doing business with governments and officials in any country, TECT is committed to acting with honesty and integrity and will comply with all applicable laws and regulations. When we sell goods or services to any government, we must know and comply with applicable procurement policies.

### ANTITRUST AND UNFAIR COMPETITION

TECT will comply with the antitrust and unfair competition laws in all countries where we do business. Business decisions involving pricing, terms and conditions of sale, dealings with customers, suppliers or competitors, and participation in trade associations may present sensitive issues under these laws.

Antitrust and unfair competition laws often are complicated. For further information, consult with the Corporate ethics/compliance officer before taking action.

TECT's goal of offering products that are competitive in quality, reliability and price is to be achieved without sacrificing business integrity. We will use only proper and legal means of gathering marketing and business information concerning competitors.

## COMPLIANCE

### TECT'S COMPLIANCE PROGRAM

TECT is committed to complying with all applicable laws and regulations. Each of us is expected to be familiar with laws and regulations that apply to our business operations and to seek help from Corporate office when questions arise.

TECT's Compliance Program has been established to prevent, detect and correct violations of law and Company policies and procedures. For further information on the Compliance Program, consult with the Corporate ethics/compliance officer.

### INTERNATIONAL COMPLIANCE

TECT is committed to complying with the laws and regulations of the countries in which we conduct business. As a U.S. company, TECT must also comply with U.S. laws that apply internationally as well as with the *TECT Business Conduct Guidelines*, even when they seem inconsistent with local practice. Questions about the application of a U.S. or local law should be referred to the Corporate ethics/compliance officer.

Many U.S. laws apply to TECT's operations, including:

**Foreign Corrupt Practices Act.** The U.S. Foreign Corrupt Practices Act (FCPA) prohibits bribery of foreign government and political party officials. The FCPA also requires proper record keeping and internal accounting controls in the Company's operations.

**Export Controls.** The U.S. has controls which restrict the export of certain products, services, technical data and software to other countries, as well as the re-export of those items from one non-U.S. destination to another. TECT operations worldwide must comply with all applicable U.S. export control laws. The *TECT Export Management System Guide* describes the types of policies and procedures necessary to comply with U.S. export control requirements.

**Boycotts.** U.S. law prohibits U.S. companies from participating in or cooperating with restrictive trade practices or economic boycotts imposed by other nations. Any suspected boycott issue should be referred to Company legal counsel.

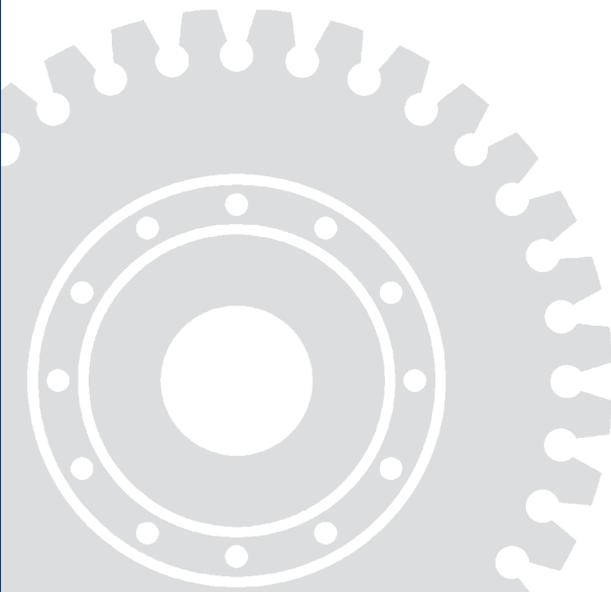
**Antitrust.** U.S. antitrust laws may apply to transactions by non-U.S. operations if U.S. trade is affected. Consult with Company compliance officer for further information.

## REPORTING VIOLATIONS

Each of us has a responsibility to promptly report suspected or known violations of the *TECT Business Conduct Guidelines*, including any violation of law. Reports normally should be made through regular reporting channels. However, an employee may choose to make a report to their plant or Corporate ethics/compliance officer, the plant Helpline/Hotline, the TECT Corporate Helpline/Hotline, the Vice President and CHRO or other Corporate officer. There will be no reprisals or retaliation against any employee for reporting in good faith a suspected or known violation. If requested, we will strive to maintain the confidentiality of the source.

Suspected violations will be investigated by appropriate Corporate and plant personnel. Where an investigation reveals the need to take corrective action, we will implement changes to systems, practices and procedures.

Violations of the *TECT Business Conduct Guidelines* are subject to disciplinary action up to and including discharge. In many instances, a violation of these *Guidelines* may be a violation of law subjecting the employee and TECT to civil or criminal penalties, fines or other sanctions.



# PERSONAL COMMITMENT/ ACKNOWLEDGEMENT TO TECT BUSINESS CONDUCT GUIDELINES

I acknowledge that I have personally received a copy of the *TECT Business Conduct Guidelines*.

I understand that every TECT employee is required to comply with all applicable laws and the *TECT Business Conduct Guidelines*.

I know that if I have questions or concerns about compliance with laws or these *Guidelines*, I must promptly direct my questions or concerns to my supervisor, ethics/compliance officer or Corporate ethics/compliance officer.

I understand my obligation to promptly report to the Company any violations of the *TECT Business Conduct Guidelines* that I suspect or know of today or which may come to my attention in the future, including any violation of law.

---

Name (*please print*)

---

Signature

---

Date

---

Location

