



INNOVATION IN MINIATURE

THE LEE COMPANY

TECHNICAL CENTER

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THE LEE COMPANY ETHICS POLICY

The Lee Company is committed to producing products that are engineered, sold and manufactured to the highest levels of quality. It is similarly our policy to maintain the highest ethical standards in relationships with employees, suppliers and customers.

It is the policy of The Lee Company to comply with all laws of any country in which we do business.

Any bribery of, or by, Lee Company employees is unacceptable. In the course of doing business with prospective or current customers and vendors it is not unusual for business to take place over meals. Modest meals, gifts of de minimus value and the like are acceptable. If there is any doubt as to the appropriateness of such an offering the employee should request guidance from their supervisor.

All behavior (either by, or toward, a Lee Company employee) which you believe is unethical should be reported to management, we have established an Ethics extension (ETHX or 3849) which will be routed directly to the company president.

Behavior determined to be unethical can lead to personnel actions up to and including termination of employment.

THE LEE COMPANY

William W. Lee
President & CEO