

WESCO

VALVE & MANUFACTURING COMPANY

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To whom it may concern,

The successful business operation and reputation of Wesco Valve is built upon the principles of fair dealing and ethical conduct of our employees throughout the world. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of Wesco Valve is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees owe a duty to Wesco Valve, its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public.

Wesco Valve will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

Our employees will conduct themselves and their affairs in a manner that respects the interests of other employees and customers, and avoids any conflicts of interest of Wesco Valve. All employees will avoid any situation that involves a business transaction, gift, favor, or other consideration that can appear to result in the personal enrichment of the employee, or the employee's relative or other relation. No employee will accept any gratuity from any person doing or attempting to do business with Wesco Valve, unless approved by the Vice President. Because acceptance of a gratuity can place Wesco Valve and employees in compromising situations, this policy is set up for the protection of Wesco Valve and its staff and any business doing business with Wesco Valve. Any questions regarding Wesco Valve's expectations for employees should be immediately directed to their supervisor or Human Resources.

Compliance with this policy of business ethics and conduct is the responsibility of every Wesco Valve employee.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of Wesco Valve. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, or both. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of Wesco Valve's business dealings.

If employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of Wesco Valve as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which Wesco Valve does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Wesco Valve.

The materials, products, designs, plans, ideas, and data of Wesco Valve are the property of Wesco Valve and will never be given to an outside firm or individual except through normal channels and with appropriate authorization. Any improper transfer of material or disclosure of information, even though it is not apparent that an employee has personally gained by such action, constitutes unacceptable conduct. Any employee who participates in such a practice will be subject to disciplinary action and possible termination of employment.

Wesco Valve suppliers must also ensure compliance with their commitments to Wesco Valve and their standards of business integrity and also demonstrate a commitment to their own policies including safety, human rights, product stewardship, sustainable development and proprietary information.

Please report any infractions or questionable actions of any of the above expectations to our Human Resources department at 1-800-525-0143 or if you wish to remain anonymous please call our Integrity Hotline at 1-833-290-0001 or www.lighthouse-services.com/sswesco or reports@lighthouse-services.com.

Sincerely,

David Kocher
Vice President
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