

Edw. C. Levy Co.
Values and Responsibility

April 2022

At the Levy Group of Companies, doing the right things, the right way is central to our character and our business ethics. We all work extremely hard every day to assure that the services, products, and solutions we provide enhance the successes and lives of our customers, our employees, and the communities in which we live and work.

We follow our words with our actions by providing solutions that are provided with the highest quality and integrity. We price our products fairly and assure that our operations are ethical, and our conduct is honest and transparent.

As our mission statement states, we strive to treat others as we wish to be treated. We expect that all of the Levy family will follow this simple rule which include the ideals contained in this Values and Responsibility document.

Evan

S. Evan Weiner

CEO

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Introduction

This Values and Responsibility document applies to all employees of the Levy Group of Companies. This document should not be interpreted as an exhaustive list of policies and ideals that define how we wish to act but serves to highlight many important topics and sets a tone for the expectations of the behaviors of all of the Levy family.

April 2022

Vision

Each Levy business will be the world class benchmark of industry practices and economic returns.

Mission

The Levy Group of Companies will:

- Supply our employees with a safe and secure work environment and equip them with the tools to enable them to meet their individual objectives.
- Provide our internal and external customers with the highest quality products and services through a complete understanding of their needs and a total commitment to their success.
- Enrich our culture through trust, teamwork, individual initiative, high expectations, active involvement, and open communications.
- Promote innovations and harvest ideas at all levels of the organization to foster personal growth and continuous corporate improvement.
- Repay the communities that support us by operating safe and environmentally sound businesses, while sharing our success with worthy charitable causes
- Grow our business through marketing, research, and technical advances, while recycling and using the earth's natural resources in a manner which enhances the quality of life.
- Observe standards of moral and ethical conduct which will easily withstand any public or private scrutiny.
- Always treat others as we would wish to be treated and work hard to gain the same treatment from others.

Levy Benchmarks of Excellence

SYSTEMS

When All Else Fails, Read The Instructions

Our policy is to use documented, controlled and integrated quality, safety, and environmental management systems to conduct our businesses. Plans and procedures are prevention oriented. They aim at identifying risks and providing error-free, pollution-free, and accident-free processes, products and services. They enable us to comply with quality, safety and environmental standards, and to prevent, detect and remedy defects, accidents, and pollution. They are flexible, so as to better serve our customers, handle sudden emergencies, and take advantage of opportunities. They help us adhere to laws and regulations, both in letter and spirit. We use them to operate facilities and equipment which are orderly, secure, safe, healthy, and environmentally sound. Through regular audits and management reviews we continually identify system improvement opportunities.

LEADERSHIP

Not a Title, But Attitude and Actions

Not everyone is a manager, but everyone can be a leader. We each have unique skills, knowledge and expertise. We each face situations and challenges that test us. Our policy is to develop and put in place leaders in every field who focus on task at hand and set high expectation. When the going gets tough, they get others involved and motivated, individually and in groups. They encourage innovative and creative thinking. Managers are organized leaders. They set high expectations, with a special focus on safety, quality and environment. Their plans, goals, and actions allow for adequate resources and continual improvement of people, processes, products, services, and systems. They regularly review facts, data, and measurements to monitor progress; and hold people accountable for meeting goals. They communicate clearly and consistently and are great listeners. And their actions consistently support their words.

INTEGRITY

Do Unto Others...

Our first business policy might also be called “character”. At Levy, integrity means that we would wish to be treated. By “others”, we mean customers, suppliers, and of course, our fellow workers, who are “internal customers”. We will work hard to gain the same treatment from them by giving them the best products, services and information we are capable of giving. Integrity means that we will share our success with others. We encourage and support employees at all levels of participating in worthwhile charitable causes. We will strive to be known as “good neighbors” in the communities where our work takes place. Above all, integrity means we will firmly adhere to the highest standards of fairness and ethical behavior in all our business relationships.

CUSTOMERS

Treat Them Well, They Pay the Bills

We use systems to document and transmit customer requirements, to better understand their needs and anticipate their expectations, and to measure their satisfaction with our performance through regular feedback. We strive to provide high value-added products and services which contribute to customer success, and therefore enhance our own growth and profitability. Leaders install the drive to provide consistently superior service in every employee. To strengthen customer loyalty, we provide reliable products and services. We make and meet our customer commitments. Our aim is to exceed our customer's expectations. Customer complaints are dealt with fairly, promptly, and equitably; complaints are used to improve products and services to the customer. Knowing that systems are essential but imperfect, we empower our people to meet the needs of the customer, as well as meeting the needs of the system.

EMPLOYEES

Treat Them Right, They Keep Us in Business

Levy employees, from top managers on down, are the focal point of our organization. We hire, promote, and recognize employees based on their potential and actual value contributions. We strive to provide all our people with the tools, training, experience, resources, and development opportunities they need to grow and improve personally, and to do their jobs effectively and efficiently. We encourage employees to continuously improve, to participate in decision-making, and to help set and meet organization goals, both as individuals and as teams. We strive to make sure that employees are motivated to achieve excellence through trust, respect, recognition, and empowerment. We use objective feedback to improve personal performance, and to recognize those who achieve excellence.

PROCESS

Do The Right Things The Right Way The First Time, Every Time

Proven processes are used in all our systems to transform materials, information and machinery into products and services. We use processes which are effectively controlled, are safe to operate, and which have minimal impact on the environment. An understanding of our cost structure and continuous process improvement provides the foundation for good business decisions, including business growth. Customer and Levy owned property is properly safeguarded. Information needed to operate is clear, timely, complete and readily accessible. Suppliers are selected, measured, and rewarded based on their value contributions. We use recycling, conservation, benchmarking, preventive maintenance, calibration, and advanced technology to achieve process excellence. Key processes are measured and monitored, using appropriate statistical methods. Quality, safety and environmental records and data are properly maintained and analyzed to improve process performance.

Levy Culture

The following sayings highlight some of the ways in which we define the Levy Culture.

1+1=3

For over 30 years, Levy forms joint ventures with domestic and international partners to provide superior solutions to steel, construction, and agriculture industries worldwide. These strategic partnerships enable Levy to anticipate and respond to customers' evolving challenges on a worldwide basis.

FROM RED TO GREEN

Levy transforms red hot molten slag into an environmentally beneficial material used in an array of industries. The manufacturing process may start out fiery red but will ultimately bring green solutions to our customers and the world.

COMMUNICATION

The success of any organization can be measured by the ease and effectiveness of its communication. Internally and externally, we strive for open, honest, and frequent exchange.

LEARNING

Levy encourages lifelong learning. We are challenged to be more and do more. We aspire to develop our strengths, build on our knowledge, and learn from our mistakes.

SUPPORT

At The Levy Group, everyone is part of the family. Much like a family, The Levy Group of Companies embraces struggles and challenges and works to help our family members explore their potential and achieve their goals.

TEAMWORK

The Levy Group of Companies leverages the diversity of our employees and promotes collaborative, inclusive, aggressive teams to make the best decisions and to deliver the most unique, successful results.

SAFETY IS A VALUE

By empowering and engaging all employees in the safety process, we promote safety as a core value at The Levy Group of Companies.

WORLDWIDE IMPACT

At Levy, our global reach serves industries that are essential to infrastructure, global economic growth and sustainability. Our customers depend on our industry-leading quality, service, products, and best-in-class safety. On five continents, we provide solutions in different languages, cultures, and geographic environments.

COURAGE

All Levy employees are expected to address issues head on and to embrace the constructive conflict necessary to make change happen.

NEVER SATISFIED

The Levy team is determined to confront challenges head on, define opportunities, design solutions, and deliver ongoing, continuous improvements that exceed our customers' expectations.

PARTNERSHIP

At Levy, our customer is our partner. Through shared values, combined talents, and a commitment to our joint success, we forge long-term mutually beneficial relationships.

RESPONSIVE

Our use of advanced technologies, proactive communication, and the world-class skills of our employees enables us to deliver quick, agile, data-driven solutions.

SHARED VISION

The Levy Group of Companies strives to facilitate communications in order to achieve a shared vision.

ENTREPRENEURIAL

Levy values entrepreneurial thinking. We are encouraged to take educated risks and to promote constructive change in the organization. At Levy, we believe innovation does not come from doing the same thing the same way.

THINK BIG / ACT SMALL

The Levy Group of Companies has grown in scale and depth. It is through the use of internal social media, dynamic cross-functional teams, and real-time information sharing that enables us to maintain the agility, flexibility, and culture of a small company.

Data Driven

At Levy, we strive to be the best. By being data driven with aggressive measurement systems and through the use of new technologies, we continuously improve our products and services to be the best in the industries we serve.

RELATIONSHIPS

Our success is measured by the depth of our relationships with our employees, customers, and communities.

LEAN

Levy incorporates the key components of Lean Manufacturing as a part of our culture. Through active employee engagement and the use of lean tools, we achieve safety, productivity, and process excellence.

COLLABORATION

Levy employees aspire to be the best in their fields. Our desire to share our experience and lessons learned helps us to challenge each other and deliver expert solutions locally, regionally, and globally.

CREATIVE

Through the use of dynamic, high-performance teams and by leveraging the diverse experiences of our people, The Levy Group of Companies is able to create the best solutions and provide the highest value to our customers.

GOOD BETTER BEST

Key to our success is providing an environment where new ideas are encouraged, and the best ideas are used.

CONNECTED

Levy connects our experts around the world. We have learned that successful solutions come when we use all of our resources to help solve problems and exploit opportunities. Through LevyShare, LevyLearn, LevyLync, and our expanding internal network, we can communicate, innovate, and generate solutions.

PHILANTHROPIC

Every Levy employee is encouraged to find ways to support the communities in which they work and live.

RESOURCEFUL

For over 100 years, The Levy Group of Companies has developed products in all business lines to enhance our environment. For every client, we explore and determine the best product that will deliver the highest performance for their application. We call that truly resource-full.

GRIT

At Levy, we know that it is only through our employees' passion and perseverance that we reach our goals. It's our grit that allows us to do what others can't.

OPPORTUNITY

The Levy Group of Companies ensures its people are given the tools and environment to succeed.

FAMILY

Through investing in our people, we promote an environment that embodies the essence of "family," which fosters imagination, creativity and the opportunity to truly make a difference.

Decision Making

When faced with a difficult decision about business conduct, ask these questions:

Is the conduct a violation of our Values and Responsibility document or the law?

Is the conduct in conflict with our mission, vision, benchmarks and/or culture?

Will the conduct appear unethical to stakeholders outside our Company?

Could the conduct harm my reputation or the reputation of Levy?

If the answer to any of these questions is “YES,” ask for help.

Reporting/Speaking Up

If you think there is a violation of the Values and Responsibility document, or if you think an activity or behavior could lead to a violation, it is your responsibility to speak up.

Whether you report anonymously or give your name, you should provide as many details as possible, so the issue can be addressed thoroughly and promptly. In addition, you have a responsibility to cooperate in an investigation.

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened.

You also help build trust with each other and with our customers, our suppliers and other business partners.

If you have concerns you should discuss these with your manager.

All Levy employees also have the option of using LIGHTHOUSE to communicate violations.

An employee who believes that they have experienced or witnessed any conduct in violation of the Values and Responsibility document should, and is encouraged to, immediately report that concern to a manager, Human Resources Representative or through the Ethics and Integrity Reporting hotline, which is available 24 hours a day, 7 days a week: Hotline: 1-877-938-0007 Fax: 215-689-3885 (include company name) Website: www.lighthouse-services.com/edwclevy

No Retaliation

You are the eyes and ears of our Company, and we value your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in a Code investigation. Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded – is never an excuse for any kind of retaliation.

Diversity and Inclusion

The Levy Group of Companies is committed to fostering a culture that values respect, inclusion and diversity with the goal of creating an environment where all employees can work productively, safely and effectively. To that extent, the Company is committed to providing a workplace that is free from discrimination, including harassment that is based on any legally protected status.

Levy's Non-Discrimination and Anti-Harassment Policy can be found [here](#)

Harassment

We treat people with respect and equality. We are committed to providing a healthy work environment and culture and extend those commitments to our dealings with all external parties. It is the policy of the Edw. C. Levy Co., its divisions affiliates and subsidiaries to provide and maintain a workplace for each of its employees, which is free from sexual harassment.

Levy's Sexual Harassment Policy can be found [here](#)

DRUG AND ALCOHOL-FREE WORKPLACE

Levy expects its employees to work free from the influence of any substance, including drugs and alcohol, which may prevent them from conducting work activities safely and effectively. We commit to live our Values by showing up each day ready to focus on creating Innovative solutions for our customers, while being able to communicate effectively and respectfully. If you are using prescription or non-prescription drugs that may impair alertness or judgment, or witness a co-worker who may be impaired and, therefore, possibly jeopardizing the safety of others you should report it immediately. We encourage anyone who may have an alcohol or drug problem to seek assistance.

Levy's Drug and Alcohol-Free Workplace Policy can be found [here](#)

Child Labor

Levy endeavors to provide a conducive working environment that is characterized by equality and mutual respect. The company will not tolerate the use of child or forced labor, nor exploitation of children in any of its global operations and facilities.

Definition Child labor, as defined by the International Labour Organization (ILO) Convention is “work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child. In the conduct of its business

Levy:

- Will not employ children that falls into the definition as stipulated by ILO Convention, notwithstanding any national law or local regulation.
- Will comply with all other applicable child labor laws, including those related to wages, hours worked, overtime and working conditions.
- Is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.
- It is the responsibility of local management and Human Resource Department to implement and ensure compliance with this policy at all Levy operations and facilities.

Human Trafficking

Purpose

Levy and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading: "Summary of U.S. Government Policy of Prohibiting Trafficking in Persons."

Levy is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. [Company name] will not tolerate or condone human trafficking or slavery in any part of our global organization.

Levy employees and subsidiaries avoid complicity in any practice that constitutes trafficking in persons or slavery.

Scope

This policy applies to all personnel employed by or engaged to provide services to Levy, including, but not limited to, employees, officers, and temporary employees of Levy and Levy's U.S. and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding, and complying with this policy. If you have any questions or concerns relating to this policy, consult the [Company name] legal department or human resources department.

Procedures

Report any conduct that you believe to be a violation of this policy to Levy's legal or human resources department. Reports may also be made through the Levy's Ethics Hotline at

Hotline: 1-877-938-0007

Fax: 215-689-3885 (include company name)

Website: www.lighthouse-services.com/edwclevy

which allows anonymous reporting as permitted by applicable law.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

Family Medical Leave Act

All people may need to deal with extraordinary events in their lives. Levy has a Family Medical Leave Policy which lays out how our staff can take the time needed to manage these issues.

Levy's FMLA Policy can be found [here](#)

Fraud Policy

At Levy, we take the threat of fraud very seriously. We expect all employees to treat everyone with respect and to conform to all requirements of the law. Levy will strictly enforce its Fraud Policy and will fully punish violators of the law.

Levy's Fraud Policy can be found [here](#)

Communications

Levy Employees should take care to ensure that all business records and communications, including electronic communications, are clear and accurate. Electronic communications include, but are not limited to email, messaging, video conferencing, chat rooms, Wikis, phone, and fax.

The Company may have obligations to preserve electronic communications and other information in connection with existing or foreseeable Legal Matters, such as litigation, investigation, subpoenas, or enforcement proceedings. Upon direction from the Legal Department, you must not alter, delete, or destroy electronic communications or information subject to a Legal Hold Notice.

Levy Employees should remember that your business communications may be shared or become public through these legal events or publication in the media. Potential risks from inaccurate or misleading statements include, but are not limited to, claims of false advertising, misrepresentation, breach of contract, securities fraud, unfair disclosure, and antitrust violations.

You must consult with the Legal Department and your department director before making formal statements or providing information about Levy, our products, or our business and fellow Levy Personnel to journalists, bloggers, and industry analysts through any public forum (such as a tradeshow or conference or your Facebook profile).

You may not give an endorsement or other statement on behalf of Levy or personal endorsement that identifies your affiliation with Levy, except when approved by your management.

Confidentiality

Levy's confidential business information is an asset that everyone must protect. Levy Personnel are required to use confidential information of Levy for business purposes only and must always keep such information in strict confidence. This responsibility extends to confidential information of third parties that we have received under non-disclosure agreements.

Your obligation to maintain the confidentiality of this information means that you may not share any such information outside of Levy unless Levy has appropriate non-disclosure agreements in place. For help in establishing such an agreement, if you have questions about provisions of a non-disclosure agreement already in place, or if you have questions about whether certain information can be disclosed, please contact your manager.

Privacy

Edw C Levy Co ("we" or "us") is a 'data controller' for the purposes of the laws of the State of California and, the European Union and its member states (the "General Data Protection Regulation") and other jurisdictions and we are responsible for, and control the processing of, personal information which we hold about you. Your personal data will be collected, processed and used by us only in compliance with the applicable data protection laws. This Privacy Notice (the "Privacy Notice") relates to Edw C Levy Co and can be found at edwclevy.com. We may make changes from time to time and will notify you about these changes accordingly.

Levy's Privacy Policy can be found [here](#)

Competition, Fair Dealings, Antitrust

Antitrust and competition laws promote fair competition and protect consumers from unfair business practices.

These laws frequently address illegal agreements between companies, such as price fixing, as well as other unfair trade practices that restrict competition.

We comply fully with all applicable antitrust and competition laws including the Foreign Corrupt Practices Act (FCPA).

We are responsible for dealing fairly with customers, suppliers, competitors and other third parties. This means our employees avoid taking unfair advantage through manipulation, concealment, or misrepresentation of key facts, or other unfair practices. For questions on antitrust and competition laws, contact the Law Department.

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Bribery

All Levy employees are to follow anti-bribery and anti-corruption laws wherever they do business and, regardless of what local laws may permit, never offer, pay, promise to pay, or accept anything of value either directly or indirectly to improperly influence the judgment or actions of others.

Environmental Health and Safety

Edw. C. Levy Group of Companies

Environmental, Health and Safety (EHS) Value Statement

The Levy Group of Companies incorporates the health and safety of employees and environmental stewardship into our culture. Our philosophy is to operate in a safe, responsible manner, respecting and protecting the environment, and the health and safety of employees, customers, and the communities where we work. We will not compromise environmental, health & safety values for profit or production.

All employees are expected to understand, promote, and assist in the implementation of this policy. We promote the understanding, cooperation, and implementation of this policy and participation in environmental, health and safety programs through the training and education of our employees and reporting our progress to executive management.

Levy commits to the following EHS principles and allocating resources to implement, measure, assess and regularly report EHS progress to executive management:

SAFE AND HEALTHY WORKING CONDITIONS: We will provide safe and healthy working conditions for our employees to prevent injuries and illnesses. All employees, at every level of the organization, are empowered and expected to take appropriate actions to maintain safe and healthy working conditions.

PROTECT THE ENVIRONMENT: We will protect the environment by implementing our EHS management system, decreasing emissions, minimizing waste, preventing pollution and identifying recycling and reuse opportunities. We will use processes, practices, and materials that avoid, reduce, or control pollution to the greatest extent technologically and economically feasible.

COMPLIANCE: We will comply with all applicable laws, regulations, permits, and other requirements, and will develop and employ more restrictive internal standards where necessary to conform to our environmental, health and safety expectations.

RISK MANAGEMENT: We will integrate risk management into all operations. Through the assessment of risk, the elimination of hazards or the implementation of effective controls, we will reduce the risk of injury or illness to our employees and the risk of harm to the environment.

PARTICIPATION: Employee consultation and engagement is critical to the success of our operations. Management and employees (and worker's EHS representatives where they exist) will work together to establish and review EHS objectives and targets that advance the goal of preventing all environmental, health and safety incidents, providing a safe and healthy workplace, and maintaining environmental integrity.

CONTINUAL IMPROVEMENT: We commit to the continual improvement of our EHS management system, processes, environmental impacts, and the health and safety of our employees, customers, and the communities where we operate. All operations are routinely reviewed for opportunities to improve the way we do business.

Information Technology

The Edw. C. Levy Co. relies on its computer network to conduct its business. To ensure that its employees, independent contractors, agents, and other computer users use its Computer Resources properly, the Company has created a Computer Use Policy.

The rules and obligations described in this Policy apply to all users (the "Users") of the Company's computer network, wherever they may be located. Violations will be taken very seriously and may result in disciplinary action, including possible termination, and civil and criminal liability.

It is every employee's duty to use the Company's Computer Resources responsibly, professionally, ethically, and lawfully.

Levy's Computer Use can be found [here](#)

Secure Workplace

One of the goals of the Edw. C. Levy Group of Companies is to: **“Supply our employees with a safe and secure work environment”**. In order to achieve this goal, it is necessary to have cooperation from all employees. We expect the highest standard of moral conduct from, and respect for, each individual in the workplace.

Therefore, to protect the well-being and rights of all employees, customers, and suppliers, the following rules are in effect. **Violation of any of these rules will result in disciplinary action, up to and including termination of employment.** If severe, the Company may seek criminal prosecution.

The following conduct is strictly prohibited:

- 1. Racial, sexual, or other harassment including, but not limited to, abusive language, threats, intimidation, or coercion.**
- 2. Any acts of physical violence directed towards individuals or property.**
- 3. Possession of any weapons or explosives while on duty or on Company or customer property or in Company owned vehicles.**

Also, employees shall not enter the Company premises unless they are scheduled to work or are otherwise authorized by management.

The above is not an all-inclusive list of activities considered to be contrary to the maintenance of a safe and secure work environment.

The Company retains the right to authorize or conduct searches on Company property and the prerogative to contact law enforcement agencies when appropriate.

Your responsibility as an employee is to report any violation of the above rules to site supervision immediately. Operations management shall notify the Human Resources Director or Security Director who will investigate the circumstances. The alleged offender may be suspended pending the results of the investigation. The Company reserves the right to take action, as it deems appropriate regarding violations of this policy.