



CODE OF ETHICS

Alco Iron & Metal Company

I. Introduction and Ethics Statement

Alco Iron & Metal Company will conduct its business honestly and ethically wherever we operate. We will constantly improve the quality of our services, products and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. No illegal or unethical conduct on the part of officers, directors, employees or affiliates is in the company's best interest. Alco will not compromise its principles for short-term advantage. The ethical performance of this company is the sum of the ethics of the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity.

II. Officer, Director, & Employee Conduct

Officers, directors, and employees of the company must never permit their personal interests to conflict, or appear to conflict, with the interests of the company, its clients or affiliates. Officers, directors and employees must be particularly careful to avoid representing Alco Iron & Metal Company in any transaction with others with whom there is any outside business affiliation or relationship. Officers, directors, and employees shall avoid using their company contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

No bribes, kickbacks or other similar remuneration or consideration shall be given to any person or organization in order to attract or influence business activity. Officers, directors and employees shall avoid gifts, gratuities, fees, bonuses or excessive entertainment, in order to attract or influence business activity.

Officers, directors and employees of Alco Iron & Metal Company will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded. This information – whether it is on behalf of our company or any of our clients or affiliates – could include strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about this company, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated on a need-to-know basis.

Officers, directors and employees will remain personally balanced so that their personal life will not interfere with their ability to deliver quality products or services to the company and its clients. Officers, directors and employees agree to disclose unethical, dishonest, fraudulent and illegal behavior, or the violation of company policies and procedures, directly to management.

Officers, directors and employees will seek to report all information accurately and honestly, and as otherwise required by applicable reporting requirements.

Officers, directors and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner. The officers, directors and employees of Alco Iron & Metal Company will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

III. Alcohol and Illegal Drugs

Officers, directors, and employees not shall report to work under the influence of alcohol or illegal Drugs, not shall consume alcohol or use illegal drugs while on duty. In addition, no one shall operate an Alco Iron & Metal Company vehicle while under the influence of alcohol or illegal drugs. For more information please see Alco's Alcohol and Drug Policy.

IV. Harassment

Alco Iron & Metal Company does not tolerate any type of harassment from its officers, directors, and employees towards any individual including other employees, vendors, or customers. Harassment or discrimination based on race, religion, age, sex, national origin, or sexual orientation will not be tolerated at any time.. Any harassment claim should be immediately brought to the attention of upper management, and an immediate investigation should commence. For more information please see Alco's Harassment Policy.

V. Use of Company Property

Officers, directors, and employees shall not use the property of Alco Iron & Metal Company for personal use or gain, without express permission from the company. When using company property proper use and care should be exercised at all times. Company Property shall not be limited to Alco's physical assets, but also include financial data, business plans, and other proprietary information.

VI. Comply with Laws

Officers, directors, and employees will be in compliance with all federal, state, and local laws. It is the responsibility of all employees to notify upper management if they believe that Alco is not in compliance with any law. Upper Management must then send request to Alco legal department to investigate compliance and provide recommendation. Areas of extreme importance for laws, regulations and ordinances are as follows:

- Environmental
- Safety
- Metal Purchasing and Sales
- Equal Opportunity Employment
- Disability
- Labor Laws

VII. Discipline

Violation of this Code of Ethics can result in discipline, including possible termination. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation. Violation of this Code of Ethics shall be treated under Alco's discipline policy which follows below.

Alco Discipline Policy

It is very important for each employee of Alco Iron & Metal Company to follow the established company procedures. The industry we work in can be a dangerous place with many hazards and if rules, regulations, and procedures are not followed you may be endangering not only yourself but your fellow workers or customers. Therefore, Alco has set up the following Discipline Procedure. If you have any questions or concerns regarding this procedure please speak to your supervisor immediately.

Progressive Discipline:

Alco's Discipline Procedure will be one of a Progressive Nature. The following steps will be enforced.

Activities Which Can Lead to Discipline:

1. Unsafe Use of Equipment of Machinery
2. Abuse of Equipment, Material, or Machinery
3. Violation of Company Regulation, Rule, or Procedure
4. Unexcused Absence
5. Tardiness for work or after break
6. Not following Direction/Order from superior
7. Insubordination to Supervisor, fellow employee or customer
8. Abuse of Cell Phone Privileges
9. Abuse of Computer Privileges
10. Drinking or Drug Use during work hours
11. Theft of Property
12. Any other activity that Management deems appropriate for discipline.

Discipline Schedule:

Please be aware that for major violations Alco Management can elect to skip warnings and immediately suspend or terminate an employee.

1. Verbal Warning: For the first violation a supervisor will give the employee a verbal warning of his violation. Verbal warnings will be noted within employee's personnel file.
2. Written Warning: For a second violation of the same offense a supervisor will issue the employee a written warning of his violation. These written warnings will be placed within the employee's personnel file.
3. Suspension: For a third violation of the same offense the employee will be suspended for one week without pay. Once the employee returns to work they will be on probation.
4. Termination: For a fourth violation of the same offense the employee will be terminated. The employee may not apply for re-hire for at least one year.

This discipline schedule will provide the normal framework for Alco's discipline structure. However, Management reserves the right to follow whatever course of discipline is warranted in each situation. For major violations management reserves the right suspend or terminate an employee without warning.

For certain minor offenses, if after six months of no repeat violation the discipline schedule may be reset.

At-Will Statement:

Please remember that all Alco Employees are At-will employees who under California law can resign or be terminated at any time with or without cause. This right is outside of the scope of Alco's disciplinary procedure.

Employee Due Process:

Each employee has the right to state their case if they do not believe that they violated any rule, regulation, or procedure. All employees will have the right to speak to their supervisor if they disagree with a warning, suspension, or termination, and will have their side heard and documented.