

People  
Products  
Performance  
Profits



**BLOUNT**  
**CODE**  
of **CONDUCT**

**BLOUNT**  
INTERNATIONAL

# **BLOUNT CODE OF CONDUCT**

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Dear Colleagues,

Blount's success is dependent on the quality of our people, products, and performance and on our focus on adhering to high ethical and legal standards. We have defined our company culture and our corporate mission in the form of Business Beliefs, which contain our four key themes that we call "P4": People, Products, Performance, and Profits. As stated in P4, our people act with integrity, which is what this Code of Conduct is all about.

The primary message P4 offers on our Code of Conduct is as follows:

- Our people behave with integrity
- We do the right thing
- We take responsibility for our actions
- We are honest

Although P4 and the Code of Conduct provide great insight on our responsibilities to Blount and to each other, as Team Members, no Code of Conduct or booklet can explain the appropriate moral conduct and ethical behavior for every situation we face. However, if we act with integrity, apply good business judgment, and seek guidance from others within Blount or external resources as identified in this Code of Conduct, we can achieve the goals of P4 and this Code of Conduct.

If, for any reason, you should have questions or concerns regarding the terms of this Code of Conduct, please contact our Legal department via telephone at +1 503.653.4226, fax at +1 503.353.3205 or email at [legal@blount.com](mailto:legal@blount.com).

As Chairman and CEO, I am committed to abiding by the terms of and carrying out the intent and spirit of this Code of Conduct, as is the Board of Directors. We ask that you share in that commitment and strive to follow P4 and our Code of Conduct on a daily basis.

Josh Collins  
*Chairman and Chief Executive Officer*



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# BLOUNT CODE OF CONDUCT

[ March 2017 ]

## INTRODUCTION

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Blount International, Inc., including all its subsidiaries, affiliates, divisions, and other business units (“Blount”), is committed to achieving the highest standards of legal and ethical conduct for itself and its Board of Directors (“Directors”), officers, and employees. For purposes of this Code of Conduct (the “Code”), references to “Team Members” include employees, officers, and Directors.

The Code sets forth appropriate legal and ethical principles by which all Team Members are expected to abide. The Code is designed to provide each Team Member with guidance on how to proceed when legal or business ethics issues arise. While covering a wide range of business practices and procedures, the Code cannot and does not cover every specific issue that may arise or every specific situation in which ethical decisions must be made. Instead, the Code illustrates and sets forth key guiding principles of business conduct that Blount expects of its Team Members in order for Blount to conduct its business in compliance with all applicable laws and regulations and with the highest ethical standards. These key guiding principles should direct Team Members to an ethical resolution of the issue at hand.

## I. ACCOUNTABILITY

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It is the personal responsibility of all Team Members to acquaint themselves with the legal and policy standards applicable to their assigned duties and responsibilities and to conduct themselves accordingly. Team Members should always be guided by the following basic principles when performing their assigned duties and responsibilities:

- Avoid any conduct that could damage Blount or its reputation
- Put Blount’s interests ahead of personal or others’ interests

A Team Member who is unsure about the right thing to do is encouraged and expected to ask someone on his or her management team. Lack of knowledge is not an excuse for making poor ethical decisions. If a Team Member becomes aware of a violation of the Code, the Team Member must report the violation to the appropriate personnel, and any such report, made in good faith, will not subject the Team Member to retaliation by Blount.

## **II. OBLIGATIONS**

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Team Members will be required to certify, in writing, on a periodic basis that they are familiar with the Code, that they have conducted Blount's business in compliance with the Code and applicable law, and that they have reported any known violation of the Code or any law.

## **III. PROTECTION AGAINST RETALIATION**

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Team Members may report a violation of the Code without fear of retaliation. No retaliatory action of any kind will be permitted against anyone making such a report in good faith. Good-faith reporting of violations or possible violations will not result in adverse consequences to the person reporting them, even if the perceived violations are ultimately proved not to have occurred. Retaliation by any Team Member is grounds for discipline up to and including termination. Any retaliatory behavior should be promptly reported.

The duties and obligations set forth in the Code may not be waived for any executive officer or Director without prior approval of the Board of Directors.

## **IV. CORPORATE AND TEAM MEMBER OBLIGATIONS TO BLOUNT**

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### **A. Confidentiality**

Much of the information that Team Members use for internal processes or create at work each day is confidential. Confidential Information is not generally known to competitors and others outside Blount and may include financial information (including but not limited to information about sales, earnings, expenses, and investments); pricing information; vendor or supplier lists; business development materials; cost of goods; personnel files; Blount manuals, guidelines, and procedures; computer software; design documents; specifications; and internal memorandums. Information collected from customers, suppliers or even fellow Team Members can also contain Confidential Information that may require protection.

Maintaining the confidentiality of Confidential Information is critical to Blount's competitive advantage and compliance with certain regulations or agreements. Confidential Information must not be disclosed, except as specifically authorized or legally required. Information that has been made public by Blount, such as press releases, news articles or advertisements, and public filings, is not considered confidential and does not require protection.

It is the responsibility of each Team Member to use discretion in handling Blount's Confidential Information so that it is not inadvertently revealed to competitors, vendors, suppliers, friends, or family members. If there is any question whether the information is confidential, assume it is and seek guidance from your supervisor/manager, the Information Security team at [informationsecurity@blount.com](mailto:informationsecurity@blount.com) or the Legal department.

## **B. Public Statements**

Disclosing information, either orally or in writing, regarding our competitors, suppliers, products, advertising/marketing strategies, branding, etc., should be reviewed by Marketing and/or Corporate Communications to ensure the information is accurate, not misleading and that confidential information is not inadvertently disclosed.

Team Members should also avoid making statements on the behalf of or in the name of Blount. Only designated representatives, in collaboration with or through Blount's Corporate Communications team may make official statements either orally or in writing.

## **C. Conflicts of Interest**

All Team Members must recognize and avoid any situation that might involve a conflict of interest. The term "conflict of interest" describes any circumstance in which a Team Member's personal interests, relationships, or activities, or those of a member of the Team Member's family, either interfere or conflict or appear to interfere or conflict with the interests of Blount. Activities that result in improper personal benefits as a result of the Team Member's position with Blount, that involve the unauthorized use of Blount time, equipment, or information, that significantly interfere with job performance, that could damage the Team Member's or Blount's good reputation, or that otherwise conflict with Blount's business interests are conflicts of interest. In essence, a Team Member should always act in the best interests of Blount and not use his or her position or influence at Blount or Blount's assets for the advantage of the Team Member or his or her family, including but not limited to obtaining improper gifts, loans, or guarantees of obligations.

Team Members should not take or create for themselves, their family or friends opportunities that are discovered through the use of Blount property, information, or position. Each Team Member should always avoid conflicts of interest, and should discuss any material transaction, situation, or relationship that could give rise to a conflict of interest, or appearance thereof, with the General Counsel.

#### **D. Third-Party Arrangements**

Team Members should not, orally or in writing, enter into arrangements with third parties on behalf of Blount unless Team Members have the authority to do so. It is the responsibility of Team Members to understand their authority and to not enter into such arrangements on Blount's behalf without sufficient review and/or approval.

#### **E. Financial Controls**

All of Blount's assets, liabilities, revenues, and expenses must be properly recorded in appropriate Blount books and records. No false or fictitious entries may be made in, and no information that should be recorded may be omitted from, the books and records of Blount for any reason. All entries in Blount's books and records must properly reflect the nature of the transactions in full compliance with accounting rules.

#### **F. Intellectual Property Rights and Usage**

Blount's intellectual property is a valuable asset that must be used properly and protected from infringement by others. The intellectual property and confidential information of other parties must also be respected. "Intellectual property" is a term that describes creative works whose authors and inventors have legal rights to them. Copyrights, patents, trade secrets, and trademarks all belong to this category.

***Software Use.*** The unauthorized copying of computer software is prohibited. Original computer software is protected by copyright law. The money paid for a software product generally represents a license fee for the use of one copy. Reproducing software without authorization may violate copyright laws (backup copies are usually permitted by license agreement).

***Trademarked/Copyrighted/Patented Materials.*** The intentional unlicensed duplication of copyrighted material for the purpose of commercial gain or competitive advantage is unlawful and, in certain circumstances, constitutes a violation of criminal law. Team Members may not use or copy a trademark, copyrighted material, trade secret, or patented invention of another or allow others to use or copy a Blount trademark, copyrighted material, trade secret, or patented invention without written permission.

***Computer Espionage.*** It is a violation of the Code and, in many cases, local or national law to use a Blount computer to gain unauthorized access to another computer system with the intent of (1) obtaining trade secrets or other confidential information, (2) destroying, impairing, or otherwise injecting a "virus" into the other system, or (3) committing any other type of computer fraud or theft.



## **G. Loans**

Blount is prohibited from directly or indirectly extending, maintaining, or guaranteeing credit (or arranging for an extension of credit) in the form of a personal loan to any Blount officer or Director.

## **H. Proper Use of Blount Property**

Protecting Blount's assets, both tangible and intangible, against loss, theft, fraud, waste, and misuse is the responsibility of all Team Members. These assets were acquired solely for the purpose of conducting Blount's business. They may not be used for personal benefit, sold, loaned, given away, or disposed of except with proper authorization. Further, all Team Members must protect Blount's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Blount's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation.

# **V. OBLIGATIONS TO THIRD PARTIES**

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## **A. Advertising**

Blount is committed to providing consumers with accurate, fair, and lawful information that is intended to help them make informed buying decisions.

## **B. Antitrust Laws/Competitive Practices**

The objective of antitrust laws of the United States and similar laws addressing competitive practices in other jurisdictions in which Blount operates is to promote competition in open markets. Generally speaking, these laws prohibit activities or agreements that unreasonably restrain trade. It is Blount's policy to comply with all governmental antitrust laws and regulations, including but not limited to those laws related to price-fixing, bid-rigging, territorial or customer allocation, and refusal to deal.

For example, collaboration on prices or terms and conditions of sale with competitors is illegal under most circumstances and discussions with competitors concerning certain topics that could lead, or appear to lead, to such collaboration must be avoided. Blount will not share confidential and proprietary business information with competitors or customers that could unreasonably restrict its competitors' access to the market.

Antitrust laws are complex and can be difficult to understand. Team Members must seek the advice of the General Counsel when dealing with antitrust issues. Any attempt to sell or otherwise disclose Blount's or anyone else's confidential information should immediately be reported to a manager or supervisor.

### **C. Business Entertainment, Gifts, and Political Contributions**

Business entertainment and, at times, the giving and receiving of gifts are a normal part of doing business. Blount has policies and guidelines regarding business entertainment and the giving and receipt of gifts to avoid having its integrity called into question. Further, to prevent damage to Team Members' or Blount's reputation, and to preserve Blount's integrity, a Team Member may not ask, directly or indirectly, for gifts or loans from Blount's current or prospective suppliers or customers or from government officials.

Team Members may accept unsolicited, inexpensive gifts from existing or potential suppliers or customers. But if a Team Member is unsure whether a gift's value exceeds the standards established by Blount, the Team Member should review Blount's policies and guidelines or seek guidance from Blount's Legal department. Gift baskets may be accepted if shared with others in the office. A Team Member may never give or accept a cash gift (including gift cards) or loan under any circumstance.

If a vendor, supplier, or customer invites a Blount Team Member for a reasonable and customary business meal or entertainment event at its expense, the Team Member may accept the invitation. If the Team Member is uncertain as to what is reasonable and customary, the Team Member should seek advice.

When giving gifts, the same principles apply. A Team Member may provide gifts, meals, or entertainment that is reasonable in value and customary in nature, is unsolicited, and is not intended to obtain an unfair advantage or improperly influence.

Governments in many parts of the world have stringent requirements regarding gifts, loans, and entertainment, and violations of these rules can be serious offenses. For example, giving gifts, loans, or entertainment to U.S. government employees is strictly prohibited. If a Team Member deals with government bodies in or outside the United States, the Team Member should ensure that he or she knows the rules that apply and seek advice from Blount's Legal department to address any uncertainty.

### **D. Anti-Corruption**

Various laws, including the Foreign Corrupt Practices Act, prohibit Blount from making payment to or offering anything of value to any foreign government officials, government agencies, political parties, or political candidates in exchange for business favors or when such a payment or offering would otherwise be intended to influence the action taken by any such individual or agency to gain a competitive or improper business

advantage. These prohibitions apply to actions taken by all Team Members and by all outside parties engaged directly or indirectly by Blount (e.g., consultants, professional advisers, and agents). Given the complexity of the regulations and laws, as well as the severe penalties associated with violations, all Team Members must contact the General Counsel with any questions concerning potential noncompliance with this section.

A Team Member may not promise or make any contribution, directly or indirectly, on behalf of Blount to any political party or candidate for public office.

#### **E. Insider Information**

Team Members are not permitted to divulge material, non-public information pertaining to Blount or its subsidiaries or affiliated companies (e.g., information relating to acquisitions, dispositions, business plans, earnings, financial or business forecasts, or competitive information) to outside entities or to other individuals within Blount if they do not have a direct and authorized need to know such information. Material information is any information that a reasonable investor would consider important in making a decision to buy, hold, or sell securities or information that could be expected to affect (either positively or negatively) stock prices of customers, suppliers, or competitors. Team Members should maintain the confidentiality of information entrusted to them by Blount or its customers, except when disclosure is authorized or legally mandated.

In addition, Team Members may not seek to obtain any material, non-public information of customers, suppliers, or competitors in an illegal or unethical manner. No information obtained by a Team Member as the result of his or her employment may be used for personal profit or as the basis for a “tip” to others, unless Blount has made such information generally available to the public. This requirement relates not only to transactions with respect to stock and other securities, but also to any situation in which undisclosed information may be used as the basis for inequitable bargaining with an outsider.

#### **F. Export and Import Regulations**

It is Blount’s policy to comply with the export and import regulations of the countries in which Blount conducts business. Each country has its own laws and regulations governing business dealings, purchases, and transportation of products and goods. There may also exist significant cultural and social differences between the United States and international sources that could potentially impact the performance and standards of operation of the global supply chain. These laws and regulations regulate and limit Blount’s

ability to import and export goods and materials and control or restrict the export of certain goods and technology to countries identified by applicable government authorities. Blount's specific policies concerning trade regulations are detailed in its policy statements issued from time to time.

***Office of Foreign Asset Control Compliance and Screening.*** The regulations communicated by the Office of Foreign Asset Control ("OFAC") of the U.S. Department of the Treasury prohibit any U.S. person, including employees of U.S. companies located outside the United States, from transferring, paying, receiving, or otherwise dealing in property or an interest in property belonging to or under the control of a large number of specially designated individuals and entities. OFAC maintains a list of entities that Blount must screen against for all transactions of business either directly or indirectly. See also Blount's Supplier Code of Conduct regarding International Business.

***Economic Sanctions and Embargoes.*** It is illegal under the law of the United States for Blount (including through Blount's companies located outside the United States) to engage in direct transactions with certain U.S.-sanctioned or embargoed countries or with sanctioned parties anywhere in the world. All Team Members have the responsibility to ensure that Blount is meeting its obligations with regard to sanctions and embargoes.

***Antiboycott Laws.*** Blount and all its operations, including foreign subsidiaries, must comply with U.S. antiboycott laws, which prohibit the participation in unsanctioned boycotts. A "boycott" occurs when one person, group, or country refuses to do business with certain other persons, groups, or countries. A variety of activities are prohibited under antiboycott laws, including but not limited to:

- Furnishing information about Blount's or any person's past, present, or prospective relationship with boycotted countries or blacklisted companies.
- Paying, honoring, or confirming letters of credit containing boycott provisions.

Violations of U.S. antiboycott laws can result in civil and criminal penalties. All Team Members are required to immediately report to Blount's General Counsel any suspected requests to participate in an illegal boycott. Simply ignoring or refusing a request to participate in an illegal boycott is insufficient and can be treated as a violation of antiboycott laws upon a failure to report. Antiboycott legislation is complicated, and Team Members should seek guidance from the General Counsel if there is uncertainty regarding whether such a request has been made.

## **G. Fair Dealing**

Each Team Member should always deal fairly with Blount's customers, suppliers, competitors, and associates. Team Members should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. But Team Members owe a duty to Blount to advance its legitimate interests when the opportunity to do so arises. Team Members should seek advice if questions arise regarding Blount's legitimate business interests and potential conflicts with fair dealing.

## **VI. OBLIGATIONS TO FELLOW TEAM MEMBERS**

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Blount is committed to providing a safe, secure, and drug-free work environment, free from unlawful harassment and violence. Blount's goal is to provide Team Members with a workplace that supports honesty, integrity, respect, trust, responsibility, citizenship, and customer service.

### **A. Equal Employment Opportunity**

Blount is an equal-opportunity employer that complies with all federal, state, provincial, and local employment laws. In all employment decisions, including recruitment, hiring, placement, promotion, reassignment, compensation, training, discipline, and dismissal, Blount must afford equal opportunity to all individuals, without regard to race, color, religion, national origin, sex, age, sexual orientation, gender identity or expression, veterans status, marital status, physical challenges or any other classification declared to be impermissible by law. Reasonable accommodations for individuals with physical handicaps or disabilities will be made.

### **B. Harassment**

Blount is committed to maintaining a professional and collegial work environment in which all individuals are treated with respect and dignity. Blount is committed to the principle that all its Team Members should be able to enjoy a work environment free from all forms of discrimination and harassment, including but not limited to sexual harassment and harassment based on race, color, religion, national origin, sex, age, sexual orientation, gender identity or expression, veteran status, marital status or physical challenges. Such harassment is a violation of law and Blount policy, is strictly prohibited and will not be tolerated.

Harassing or bullying behavior by Blount Team Members is unacceptable, whether in the workplace or in any business-related setting outside the workplace, including but not limited to business trips, business-related social events, and interaction with clients, vendors, or customers.

Blount will investigate all allegations of discrimination and harassment in as prompt and confidential a manner as possible and will take appropriate corrective action when warranted. Any person who is determined by Blount, as a result of such an investigation, to have engaged in discrimination or harassment in violation of the Code will be subject to appropriate disciplinary action, up to and including termination of employment.

Retaliation in any form against a Team Member or applicant who in good faith complains of discrimination or harassment is strictly prohibited, and is itself cause for appropriate disciplinary action, up to and including termination.

### **C. Immigration Laws**

It is Blount's policy to comply with the immigration laws and employment regulations of the countries where it employs Team Members.

## **VII. ENVIRONMENTAL HEALTH AND SAFETY RESPONSIBILITY**

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Blount strives to implement safe and environmentally responsible business practices. Each Team Member is charged with and responsible for identifying, reporting, and resolving environmental, health, and safety concerns.

In addition, all Team Members are to accomplish their duties in compliance with environmental, health and safety rules, laws, and regulations applicable to the local jurisdictions in which they work. Any Team Member violating environmental, health, and safety requirements may be subject to disciplinary action, up to and including termination of employment.

## **VIII. COMPLIANCE AND REPORTING**

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Each Team Member must report without delay through normal reporting channels any unethical, dishonest, or illegal conduct engaged in by him or her or by other Blount Team Members. Blount will take reasonable efforts to protect the identity of any Team Member making such a report, but under no circumstances will a Team Member making a report in good faith be subjected to retaliation. After exhausting normal reporting procedures, reasonably concluding that exhausting them would not be feasible, or deciding that they cannot first make a report through normal reporting channels, Team Members should make reports of such activities by one of the following three methods:

1. Calling Blount's Worldwide Code of Conduct Hotline serviced by EthicsPoint at (866) 292-7933 in the United States (international access numbers appear on page 12);

2. Accessing the EthicsPoint anonymous and confidential reporting Web site at [www.EthicsPoint.com](http://www.EthicsPoint.com), by clicking on “File a Report” at the top of the page and then entering “Blount” in the space requesting identification; or
3. Writing to the Vice President, General Counsel and Secretary, Blount International, Inc., 4909 SE International Way, Portland, Oregon 97222-4679, USA.

Due to local privacy laws and regulations, some Team Members in the European Union do not have access to the EthicsPoint anonymous reporting Web site and telephone hotline. The affected countries are noted on page 12 under the international access numbers section. If you would like to report a case, please contact your local management, Human Resources or the General Counsel.

Whether making a report through the Hotline or in writing, a Team Member should give sufficient, specific information in the message so that a full investigation can be conducted.

It is a serious violation of the Code, and under certain circumstances a violation of federal or local law, for any Blount manager or supervisor to initiate or encourage reprisal against a Team Member or other person who in good faith reports a known or suspected violation of criminal law or the Code.

## **CONCLUSION**

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Blount recognizes that it is sometimes difficult to delineate proper standards of ethical conduct. In such instances, a Team Member should not rely on his or her own personal judgment, but should fully and openly discuss the matter with the Team Member’s manager or supervisor. All managers and supervisors must comply with their responsibilities set forth in Blount’s open-door/open-communication policy with regard to Team Members’ Code or ethics questions. Blount’s management may bring any further questions concerning the ethics or legality of a particular situation to the attention of the Chief Executive Officer of Blount, or the General Counsel. Any violation of the Code will form the basis for appropriate disciplinary action, up to and potentially including termination.

## INTERNATIONAL REPORTING TOLL-FREE PHONE NUMBERS:

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### Country Number

\*Belgium

Brazil ..... 0800-8911667

Canada/United States (English) ..... 866-292-7933

Canada (French) ..... 855-350-9393

China (Southern) ..... 10-800-120-1239

China (Northern) ..... 10-800-712-1239

\*France

\*Germany

Japan/J5 ..... 0066-33-112505

Japan/JP ..... 00531-121520

Russia ..... 8-10-8002-6053011

\*Sweden

\*United Kingdom

\*Denotes countries with no access to the EthicsPoint anonymous reporting Web site and telephone hotline. Contact local management, Human Resources or the General Counsel to report a case.



## HOW TO FILE A REPORT USING ETHICSPPOINT

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***What is EthicsPoint?*** EthicsPoint is a reporting tool to communicate misconduct and promote a positive work environment.

***What to Report.*** Report situations, events, or actions by individuals or groups that you believe are violations of law, the Blount Code of Conduct, Blount policies, or other matters of a serious nature. Frivolous or unfounded reports do not help to foster a positive workplace.

EthicsPoint should not be used for immediate threats to life or property. Make these types of reports by calling your local emergency phone number (e.g., 911 in the United States).

***Example scenario of how EthicsPoint reports are handled:*** After your concern is reported through EthicsPoint, it is promptly reviewed and investigated by personnel who are most appropriate, depending on the nature of the concern. For example, concerns best handled by human resource personnel (such as pay, work hours, alleged unfair treatment, etc.) will be given to the Human Resource department to address and resolve, unless the subject matter requires that it be elevated to a higher level of management or to Blount's Legal department (such as fraudulent or criminal conduct). It is important to use Blount's resources that are best suited to address Team Member concerns for proper and prompt resolution.

***No Retaliation for Raising Concerns.*** Blount strictly prohibits retaliation against anyone for raising or helping to address a suspected violation of the Code or any Blount policy in good faith. Retaliation by any Team Member is grounds for discipline, up to and including termination.

## HOW TO FILE A REPORT - REPORTING IS AS EASY AS 1-2-3.

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1. Access EthicsPoint to report;
2. Complete a report;
3. Follow-up 2-3 business days later.

EthicsPoint is carefully designed to maintain your confidentiality and anonymity at every step. Step-by-step instructions guide you to help ensure that you do not inadvertently compromise its safeguards.

## STEP 1:

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**Access EthicsPoint to Report:** Use any one of these three convenient channels of communication.

- **Blount's Network**  
Click on the EthicsPoint icon on your intranet site. You will automatically be linked to the EthicsPoint secure Web site. Once there, click on "File a Report" at the top of the page.
  
- **Public Internet**  
From any computer having Internet access (home, public library, neighbor, etc.), go to [www.EthicsPoint.com](http://www.EthicsPoint.com) and click on "File a Report" at the top of the page.
  
- **Toll-Free Phone**  
Call Blount's toll-free ethics hotline at 1.866.292.7933 operated by EthicsPoint. A call center specialist will assist you with your report (International access numbers appear on page 12).

## STEP 2:

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**Complete a Report:** Following the on-screen or call center specialist's instructions, please complete a report, being as thorough as you can.

1. Specify what kind of report you'd like to make from the available choices.
  
2. Please read or listen to the anonymity information very carefully. It helps to ensure that you do not compromise your identity during the reporting process. Agree to the EthicsPoint terms and conditions or say "I agree" to the call center specialist.
  
3. Now complete the report, providing information about the incident, including:
  - Who: Persons engaged in the incident, including titles;
  - What: What specifically occurred;
  - Where: The location of the incident; and
  - When: The date, time, and duration of the incident.
  
4. Next, create a password. Then, the EthicsPoint system will generate an identification code called a "Report Key." Write your password and Report Key down, and keep them in a safe place. You will need these to follow up later, or if you ever want to review or amend your report.

### STEP 3:

**Follow Up 2-3 Business Days Later:** Two business days after you complete your report, please return to the EthicsPoint system to check for any follow-up questions or requests.

1. Reconnect with the EthicsPoint system using any of the three channels of communication
  - Blount Intranet;
  - Public Internet;
  - Toll-Free Phone Number (1.866.292.7933 or the appropriate international number on page 12).
2. This time, click on “Follow Up” (or ask to perform a follow-up).
3. Provide your Report Key and password.
4. You can now elect to review report details, respond to questions, and add information.
  - To review your report, just click “Report Details” or ask the call center specialist.
  - You will be told whether Blount has entered questions about your report. Answer the questions orally or by typing in the question boxes and click “Send.”
  - You can add information to the report orally or by using the “Add Follow-up Notes” box.
5. If you have agreed to participate in an EthicsChat, click “Join a Chat” at the specified time. Type your comments into the field at the bottom of the window and click “Submit.”

An EthicsChat is a real-time communication between you and a corporate representative to clarify details and answer questions. Like the rest of the EthicsPoint system, it is confidential and anonymous.

6. You may return regularly to review your report, answer questions, and add information.



# TEAM MEMBER CODE OF CONDUCT STATEMENT

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*(Please sign the statement below and return it to your Human Resources department.)*

[ March 2017 ]

I have read Blount's Code of Conduct issued to me. If I had any questions or did not understand any part of these policies, I consulted with a Blount manager or supervisor and had these issues satisfactorily addressed. Based on my reading and any such consultation, I understand these principles and will observe them.

Further, I certify that (1) I have conducted Blount's business in compliance with the Code and applicable law, (2) I have reported any known violation of the Code or any law, and (3) I will report without delay through normal reporting channels any unethical, dishonest, or illegal conduct engaged in at Blount that becomes known to me.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Location Printed Name

\_\_\_\_\_  
Employee ID

\_\_\_\_\_  
Date







Blount International, Inc.  
4909 SE International Way  
Portland, OR 97222