





## **GLOBAL REACH: MSA ETHICS GUIDELINE TELEPHONE NUMBERS**

**ARGENTINA** | Spanish/English

First dial access code 0-800-555-4288.

Then dial 800-253-5534.

**AUSTRALIA** | English

Dial Optus access code 1-800-551155 or Telestra access code 1-800-881-011.

Then Dial 800-205-5119

**AUSTRIA** | German/English

First dial access code 0-800-200-288.

Then dial 800-504-1785.

**BELGIUM** | English

First dial access code 0-800-100-10.

Then dial 800-205-5119.

**BRAZIL** | Portuguese/English

Dial 0-800-891-4126.

CANADA | English

Dial 1-800-205-5119.

**CHILE** | Spanish/English

First dial access code 800-225-288.

Then dial 800-253-5534.

**CHINA** | Mandarin/English

Dial 10-800-110-0563.

**COLOMBIA** | Spanish

First dial access code 01-800-911-0011.

Then dial 800-253-5534.

CZECH REPUBLIC | Czech/English

Dial 800-143-023.

**DENMARK** | English

First dial access code 800-100-10.

Then dial 800-205-5119.

**EGYPT** | English

First dial access code 2510-0200 (in Cairo)

or 02-2510-0200 (all other areas).

Then dial 800-205-5119.

**FRANCE** | French

Dial 0800 90 59 38.

**GERMANY** | German/English

Dial 0800-1826439.

**HONG KONG** | *English* 

First dial access code 800-96-1111 or 800-93-2266. Then dial 800-205-5119.

**HUNGARY** | Hungarian/English

Dial 06-800-12927.

**INDIA** | Bengali/English

First dial access code 000-117.

Then dial 800-365-1534.

**INDONESIA** | English

First dial access code 001-801-10.

Then dial 800-205-5119.

**IRELAND** | English

First dial access code 1-800-550-000

or 00-800-222-55288.

Then dial 800-205-5119.

ITALY | Italian/English

Dial 800-788631.

JAPAN | Japanese/English

IDC: 0066-33-801272

Softcom: 0044-22-112676

KDD: 00531-11-5087

All others: 0034-800-900162

MALAYSIA | English

First dial access code 1-800-80-0011.

Then dial 800-205-5119.

**MEXICO** | Spanish/English

First dial access code 01-800-288-2872.

Then dial 800-253-5534.

MOROCCO | Arabic

First dial access code 00-211-0011.

Then dial 888-507-5625.

**NETHERLANDS** | English

First dial access code 0800-022-9111.

Then dial 800-205-5119.

**PERU** | Spanish/English

First dial access code 0-800-50-288.

Then dial 800-253-5534.

**POLAND** | *Polish/English* Dial 0-0-800-111-1673.

**ROMANIA** | English

First dial access code 021-800-4288.

Then dial 800-205-5119.

**RUSSIA** | Russian

In Moscow or St. Petersburg, first dial access code 363 2400. For all other areas, dial 8 for dial tone,

then 10-800-110-1011.

After prompt in English, dial 866-455-0427.

**SINGAPORE** | English

First dial access code 800-011-1111

or 800-001-0001. Then dial 800-205-5119.

**SOUTH AFRICA** | English

First dial access code 0-800-99-0123.

Then dial 800-205-5119.

**SPAIN** | Spanish/English

First dial access code 900-99-0011.

Then dial 800-253-5534.

**SWEDEN** | English

First dial access code 020-799-111.

Then dial 800-205-5119.

**SWITZERLAND** | German/English

First dial access code 0-800-89-0011.

Then dial 800-504-1785.

THAILAND | Thai

Dial 001-800-11-002-2990.

**UNITED ARAB EMIRATES** | English

First dial access code 0-800-121.

Then dial 800-205-5119.

**UNITED KINGDOM** | English

First dial access code 0-800-89-0011.

Then dial 800-205-5119.

**UNITED STATES** | English/Spanish

Dial 800-205-5119.

**ZAMBIA** | English

First dial access code 00-899.

Then dial 800-205-5119.

**ZIMBABWE** | English

First dial access code 00-899. Then dial 800-205-5119.

### **DEAR MSA ASSOCIATE:**

On behalf of the MSA Board of Directors and executive management, we want to express our appreciation for your contributions to our continued success as an ethically run business. Not only have we proven to be a successful company, but our success has been achieved the right way. Simply put, we display integrity in all we do, and you illustrate that through your actions each day.

Going forward, we must all remain aware of our commitment to always choose the ethical and lawful path in carrying out our business affairs for the company. We expect all associates to conduct themselves with the highest degree of integrity and with respect for the law, without exception. This Guide to Ethical Business Conduct is intended to aid you in identifying and addressing such questions or concerns that may arise.

Of course, no book or guide can answer or address all questions or situations you might face. At times you may need the assistance of others, such as your supervisor, local human resources representative, the MSA Law Department, or the MSA Ethics Guideline toll-free telephone number. Regardless of the path you choose, you have our assurance that each question or concern will be addressed appropriately and with the utmost discretion.

Ethical conduct must take priority over all else as we build on our past success. Display integrity in all you do, and success will follow – we are sure of it.

Sincerely,

William M. Lambert

President and Chief Executive Officer

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# **BUSINESS ETHICS**

Carrying out our business with integrity means we know what is right and what is wrong, and we choose to always do the right thing. But how do we know what the right thing is? When considering an action, you should ask yourself:

- ► Is it legal?
- ► Is it in accordance with the MSA Code of Business Conduct and Fthics?
- ► Is it in accordance with other company policies?
- ► Am I being fair and honest?
- Could my action hurt the company's reputation?
- ► Would I get in trouble if someone found out?
- ► How would I feel about myself afterward?
- ► How would I feel if someone did the same thing to me?
- ► Would I be ashamed to tell my family or friends?
- Would I feel comfortable with my actions being known throughout the community or printed in the newspaper?

# **ABOUT OUR COMMITMENT AND THIS GUIDE**

#### **WE DISPLAY INTEGRITY IN ALL WE DO**

Integrity is a cornerstone at MSA in our quest to be the leading innovator and provider of sophisticated safety products that protect and improve worker health, safety and the environment.

**Mission Statement**: That men and women may work in safety and that they, their families and their communities may live in health throughout the world.

The company was founded in 1914 by two mine safety engineers, John T. Ryan, Sr., and George H. Deike, Sr., whose passion and commitment was to do everything they could to protect the lives of underground coal miners. While our business and markets have changed significantly over the years, our commitment to doing business *the right way* has not. At MSA we have a legacy of ethical conduct, and our associates uphold this legacy through their actions each day.

#### **HOW TO USE THIS GUIDE**

To ensure that we continue our commitment to integrity, MSA has prepared this Guide to help associates understand the various laws, regulations and ethical principles that govern our business. The Guide is not all-inclusive and will not provide every answer. Instead, it summarizes basic expectations for all MSA associates related to ethical conduct, compliance with the law and related company policies. It also includes information on where associates can turn to ask questions or voice concerns.

This Guide **will** supplement existing company policies and illustrate in plain language the areas of ethics and compliance that impact our business daily. The Guide **will not** discuss every company policy or situation that might arise. In instances where a conflict might exist between this Guide and a particular company policy, the words of the policy will always prevail.

#### WHAT IS EXPECTED OF MSA ASSOCIATES

We are all held accountable for our actions. MSA associates must read, understand and follow MSA company policy and comply with all applicable laws, without exception. All associates are expected to conduct themselves in a manner that reflects well upon themselves and the company, consistent with the company's values and longstanding commitment to integrity.

# MSA ETHICS GUIDELINE: HELP IS JUST A CALL AWAY

When confronted with a question or concern regarding proper ethical conduct or legal compliance, associates should err on the side of caution and seek guidance. MSA has several resources available for associates to ask questions or voice concerns regarding potentially improper conduct.

First, the company believes strongly in the open lines of communication that exist among our associates and supervisors. For that reason, associates are encouraged to approach their supervisor when confronted with questions or concerns regarding the ethical or lawful course of conduct.

For situations where associates cannot approach their supervisor, they are encouraged to contact their human resources representative or the MSA Law Department. In the case of MSA global affiliates, associates can also discuss the matter with their local general manager or zone director.

If no alternative is available or when associates prefer to remain anonymous, MSA has in place the MSA Ethics Guideline. Associates can access the MSA Ethics Guideline using a toll-free number that is staffed 24 hours a day, seven days a week, by trained specialists. Associates can also access the Ethics Guideline through the internet at www.MSAsafety.com/ethicsguideline. Information on each report is forwarded to the MSA Vice President, Secretary and General Counsel who ensures an appropriate review is undertaken. Please see the beginning of this Guide for a complete listing of countries and telephone numbers. Whether reporting by telephone or through the internet, it is important to provide sufficient details regarding the specific question or concern so that the company can adequately respond.

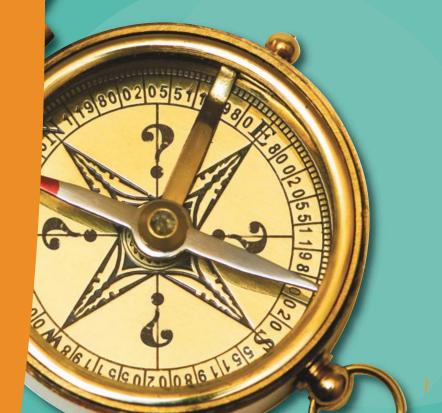
Every associate who in good faith raises a question or concern has the company's commitment that their situation will be handled in an appropriate, timely and discrete manner. For callers who provide their name, the company will contact them to discuss the outcome. The company will under no circumstances permit retaliation of any kind against associates who bring forward their concerns.

NOTE: The MSA Ethics Guideline must not be used inappropriately, such as for intentionally filing false reports against associates. Just as the company will not stand for retaliation, intentional misuse of the Guideline also will not be tolerated.

# WHEN SHOULD I CALL?

ISSUES FOR CALLING INCLUDE, BUT ARE NOT LIMITED TO:

- Conflicts of interest
- Improper financial reporting
- Fraud
- Questionable gifts or gratuities
- Theft
- Improper use of company property
- Threats or harassment
- Workplace violence
- Environmental concerns
- Antitrust concerns
- Violations of company policy
- · Any conduct you believe may be unlawful





# GENERAL LEGAL COMPLIANCE AND MANAGEMENT RESPONSIBILITY

#### **COMPLY WITH THE LAW**

(SOURCE: MSA CODE OF BUSINESS CONDUCT AND ETHICS)

There are many laws that impact our business. As a result, MSA has a process in place through which company associates are provided compliance training based upon their function and role within the organization. All associates are expected to comply with the law in all circumstances, without exception. In instances where the lawful approach may not be clear, associates must seek guidance from their supervisor, local human resources representative, the MSA Law Department or the MSA Ethics Guideline. The company will discipline all associates who act knowingly or recklessly in violation of the law.

#### **MANAGEMENT'S RESPONSIBILITY**

(SOURCE: MSA CODE OF BUSINESS CONDUCT AND ETHICS)

Every MSA manager and supervisor is responsible for maintaining a work environment that encourages, reinforces and supports ethical conduct. All MSA managers and supervisors have an obligation to lead by example and demonstrate their commitment to our Code of Business Conduct and Ethics. This includes, for example, the open discussion of ethical and legal consequences of business decisions that arise. Through their leadership they maintain the company's commitment to ethics and compliance. Supervisors must also monitor compliance with the Code of Business Conduct and Ethics in their areas of functional responsibility and must never "look the other way."

# **RESPECT FOR OURSELVES AND EACH OTHER**

#### AN ENVIRONMENT OF MUTUAL RESPECT

(SOURCE: HARASSMENT FREE ENVIRONMENT POLICY)

A key to the success of MSA is our people. With that recognition, we are committed to ensuring a workplace free from discrimination and harassment, and each of us should expect a workplace that promotes dignity and respect. MSA will, under no circumstances, tolerate any form of discrimination or harassment in the workplace and will address any such action without exception.

**Some examples of harassment**: Slurs, threats, jokes or any other threatening, intimidating or hostile acts related to race, color, gender, national origin, age, disability, religion and other protected classifications; repeated unwelcome flirtations; sexual advances or propositions; the display of any inappropriate material in the workplace; unwanted physical contact.

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#### FAIR TREATMENT AND DIVERSITY

MSA promotes diversity of thought and provides fair treatment for all associates and applicants without regard to age, color, creed, disability, ethnicity, marital status, national origin, race, religion, gender, veteran's status and any other classification afforded protection by applicable law.

Fair Treatment relates to all applicable phases of employment, such as:

- Hiring, promoting and termination of employment
- Determining wages and benefits
- Selection for training programs
- Tuition reimbursement and educational assistance
- · Layoffs, recalls and redundancies

#### A SAFE WORKPLACE

(SOURCE: WORKPLACE HEALTH AND SAFETY POLICY)

MSA is committed to ensuring the health and safety of associates at all times while performing their responsibilities for the company. Each MSA facility maintains procedures and practices for workplace safety, and each associate is accountable for adhering to them.

We are also committed to the prevention of workplace violence. To that end, weapons are not permitted on company premises, in company vehicles, or in personal vehicles parked on company premises.

For the well-being of all associates, we are also committed to a drug-free workplace. The company expects all associates to report to work free from the influence of any substance that could impair their ability to safely and effectively perform their jobs.



My supervisor frequently sends me email messages containing jokes that are rude, graphic and offensive. I am afraid I might lose my job if I complain.

You can tell your supervisor how you feel, or you can contact your human resources representative or the MSA Ethics Guideline. MSA will not allow an environment in which associates might feel harassed or intimidated. Every MSA associate should expect a work environment of mutual respect. The company will also not allow retaliation against an individual who in good faith raises a concern. Associates must also remember that company assets are for business use. The excessive use of company assets, including the MSA computer network, for personal use is unacceptable.

For the past few days, a co-worker of mine has been arriving at the facility smelling of alcohol. He is a nice guy, and I don't want to get him in trouble. However, I am starting to get concerned about his safety and the safety of others.

If you believe he might be arriving at work under the influence of alcohol or drugs, even if you are not certain, you should still discuss it with your supervisor, your human resources representative or the MSA Ethics Guideline. The matter will be discretely and appropriately reviewed, and the company will involve the right professionals to address the situation.



# **RESPECT FOR OUR BUSINESS PARTNERS**

#### **CONFLICTS OF INTEREST**

(SOURCE: CODE OF BUSINESS CONDUCT AND ETHICS)

All business decisions must be based upon sound business judgment and what is in the best interest of the company. A conflict of interest can arise when business judgment is clouded by an associate's personal stake in a transaction. Personal interests must not impact judgment, objectivity or loyalty to the company. For example, associates and their immediate family members may not own a stake in a customer or vendor that does business with MSA, while participating in those business dealings. In such cases, associates must first disclose the conflict and remove themselves from all dealings between the two organizations. Associates must also not engage in any activity or transaction with MSA that improperly benefits their own self interest. All conflicts must be disclosed in advance to the executive management of the company or the MSA Law Department.

Not only must associates avoid conflicts of interest, but we must also avoid occasions that might appear to create a conflict of interest. In many cases, the mere appearance of conflict is sufficient enough to cause problems for associates and the company. The best way to avoid a conflict of interest is to promptly disclose it. In addition, at times of uncertainty, associates are advised to contact the MSA Law Department or the MSA Ethics Guideline for guidance before acting.

#### **GIFTS AND GRATUITIES**

(SOURCE: CODE OF BUSINESS CONDUCT AND ETHICS)

Giving or receiving gifts is a relatively common practice in many industries and countries. However, our business decisions must always be based on what is best for the company. MSA associates may only give or receive gifts when doing so will not obligate recipients or prevent them from acting solely in the best interests of their organization. We must also not give or accept gifts when doing so might appear to obligate or influence the recipient's decision making. Gifts of cash or cash equivalents are never permitted. In all circumstances, the giving or receiving of gifts must also comply with applicable laws. We should also never offer an otherwise acceptable gift when we know doing so will violate the policies of the recipient's organization.

#### **U.S. ANTITRUST AND FAIR COMPETITION**

(SOURCE: ANTITRUST COMPLIANCE POLICY)

The United States antitrust laws, as well as other competition laws throughout Europe and the rest of the world, are intended to promote fair competition. MSA believes in free and open competition and will not tolerate any conduct by our associates that attempts to create for us an unlawful advantage. In short, we will comply fully with all laws related to competition.

Violations of these laws can result in severe consequences to individuals as well as the company, including criminal prosecution and substantial fines and penalties. Any questions or concerns must be directed to the MSA Law Department or the MSA Ethics Guideline.

#### Among other things, MSA associates must never:

- Enter into any formal or informal understanding with a competitor regarding the prices we will charge for our products or the markets in which we will sell.
- Engage in the practice of agreeing with a competitor on who will submit a low or high bid, or whether one of us will forego bidding on a particular contract. This is sometimes referred to as contract bid rigging, and it is unlawful

MSA is regularly involved in formal trade groups and other associations in which our competitors also participate. When used properly, these organizations are lawful and valuable tools to our continued success. However, we must always exercise caution when attending such meetings. Among other things, we must ensure each meeting is properly sanctioned by a sponsoring body (such as the NFPA or ISEA), a written agenda is followed, and the sponsoring body's legal counsel or compliance expert is involved in the meeting. We must avoid meetings with competitors other than as part of sanctioned trade association activities; the mere appearance of impropriety can result in potentially serious consequences.



My spouse and I own a small vendor company that provides an important service that MSA requires. I am responsible for selecting the vendor, and I'd like us to select my company. I would make sure MSA is charged a fair price.

Selecting the vendor would be an improper conflict of interest, even if the associate ensures that his company charges MSA a fair price. Since the associate also owns the vendor company, he cannot fairly represent MSA's interests. MSA may still do business with the vendor, but the MSA associate must disclose the relationship to MSA executive management or the Law Department and remove himself from all dealings between the two companies. Someone else will need to decide whether the vendor is a proper business partner.

I am active in a trade association important to our business. The trade association involves many of our competitors. After the last meeting, a few of the competitors approached me to complain about pricing and then asked me to go out for dinner. I declined. Could I have gone?

Informal gatherings among competitors should be pursued with great caution. First, we might be unwittingly drawn into an inappropriate conversation about a price increase or some other unlawful subject. In addition, to an excluded competitor or some other third party the informal gathering may appear suspicious. Contact the MSA Law Department immediately if you are ever involved in this type of situation.

An MSA vendor that I am responsible for overseeing recently extended an open invitation for my family to use his vacation home. I would never make a decision based upon that fact. I would only do what is in the best interests of MSA. Can I take him up on the offer?

No. Even if you insist it would not influence your decision making, a reasonable person would almost certainly conclude that you are somehow conflicted. This in an inappropriate qift and creates the appearance of impropriety.



# **RESPECT FOR OUR SHAREHOLDERS**

#### **INSIDER TRADING**

(SOURCE: INSIDER TRADING POLICY)

(SOURCE: INFORMATION DISCLOSURE TO INVESTORS POLICY)

The buying and selling of MSA stock is highly regulated. At the same time, maintaining the confidence of our shareholders and the public trading markets is very important to our continued success. We must at all times be aware of the rules and regulations governing the improper use of significant business information not known to the public. This is often referred to as "inside information." In short, MSA associates cannot use such information for the purpose of personal financial gain or to tell other people to sell or buy our stock, before the information is made publicly available through appropriate media outlets. The consequences to the company and to individuals can be severe.

A few examples of inside information are: financial results, information concerning potential mergers or acquisitions, the award of large contracts, important management changes in the organization and other information that might impact the price of MSA stock.

Subject to black-out periods as described in the MSA Insider Trading Policy, MSA associates can of course trade MSA stock as long as their decision to do so is in no way based upon their knowledge of inside information. Associates who have any doubt about whether they are subject to a black-out period or whether particular information has been disclosed to the public are advised to contact the MSA General Counsel or Chief Financial Officer prior to trading MSA stock.

#### **USE OF COMPANY ASSETS**

(SOURCE: CODE OF BUSINESS CONDUCT AND ETHICS)

In many instances, MSA associates are entrusted with numerous and valuable company assets. Not only do associates have access to financial assets such as bank accounts but, in many circumstances, they also have possession of equipment, vehicles, inventory, office supplies and intellectual property such as trade secrets. Associates must take reasonable steps to safeguard assets entrusted to them.

Company assets are for business use, and associates are responsible for the safekeeping of all assets entrusted to them. Abuse, theft, fraud, embezzlement or disclosure (in the case of intellectual property) of MSA assets is strictly forbidden. Excessive or inappropriate personal use of company assets also is not permitted.

#### **ACCURACY OF BOOKS AND RECORDS**

(SOURCE: CODE OF BUSINESS CONDUCT AND ETHICS)

Our investors rely upon MSA to provide accurate information to enable them to make informed decisions. All business information and activities must be properly and accurately recorded. Established accounting procedures must be followed at all times. No false entries may be made in the books and records of the company, and all such records must accurately reflect the corresponding transactions or events.



Yesterday was the last day of the quarter. We intended to ship a very large order so that it could be "booked" on the financial statements for the quarter. Unfortunately, we fell behind and did not ship it until today. I posted the order as shipped yesterday, since it would have shipped if we had more people working.

An order cannot be recorded as shipped until it has shipped. An order that is so recorded before it has shipped may impact the accuracy of the company's financial statements, resulting in potentially serious implications to the company.

I saw my coworker stealing supplies last week. It wasn't any big deal, just some CDs, pens and note pads.

The theft of company assets, regardless of their value, is not tolerated. Also, the cumulative impact of minor theft would cost the company thousands of dollars each year if tolerated.

Today, my boss returned from a meeting and told me we just won a new contract with the government. This contract is the largest award for MSA in ten years. He told me to keep it quiet until it is official next week. I would like to buy MSA stock because it will certainly increase in price once the public learns of the contract.

Knowledge of the contract award is "insider information" because it has not been publicly announced. Accordingly, it is unlawful to buy or sell MSA stock on the basis of that information. Associates concerned about whether they may properly trade MSA stock must contact the

MSA General Counsel before proceeding.

I work a second job that does not conflict with my duties at MSA, and I obtained my manager's permission to work that second job. Unfortunately, I leave work 10 minutes early each day to avoid being late for my other job.

Not only might this violate workplace rules related to working hours and job scheduling, but it may also improperly benefit the associate's self interests to the detriment of the company since the associate is spending MSA working time to travel to a second job. The associate should speak with his supervisor or human resources representative. (see conflicts of interest on page 10 of this quide).



# RESPECT FOR OUR MARKETPLACE AND OUR COMMUNITIES

#### **BRIBERY AND CORRUPT POLICIES**

(SOURCE: FOREIGN CORRUPT PRACTICES POLICY)

Most countries have laws in place aimed at preventing corrupt business practices, such as bribery. One such U.S. law, the Foreign Corrupt Practices Act (or "FCPA"), prohibits U.S. companies and their affiliates from engaging in corrupt business practices with foreign government officials. The U.S. government aggressively enforces this law. MSA strictly prohibits corrupt business practices, such as the bribery or attempted bribery of government officials and other persons.

Under the FCPA it is unlawful to give or promise to give anything of value to a foreign government official in order to influence that official in awarding business to MSA. The law applies to all forms of government officials, ranging from elected officials to clerical-level bureaucrats. It is also unlawful to use a third party, such as a commission agent, to carry out an act which would be unlawful for MSA to carry out itself. MSA can even be held responsible for the unlawful acts of our commission agents if we should have reasonably suspected they were involved in a corrupt practice. For example, a commission agent who requests that we pay its commission up-front in cash should cause us to suspect wrongdoing.

Questions regarding the FCPA and other anti-corruption laws should be directed to the MSA Law Department.

#### **EXPORTING OUR PRODUCTS AND TECHNOLOGIES**

(SOURCE: IMPORT/EXPORT COMPLIANCE POLICY)
(SOURCE: TRADE SANCTIONS COMPLIANCE POLICY)

A number of U.S. laws govern the way we conduct certain transactions with foreign countries and specific parties. These laws apply to U.S. operations, U.S. persons (wherever located), and products manufactured around the world using parts or technology of U.S. origin. Many countries also have their own similar laws.

For example, U.S. law requires that an export license be obtained before certain categories of MSA products or technology can be exported or re-exported. As used in export law, "export" means not only shipping a product outside the U.S., but also exporting technology or even sharing it with a foreign person while inside the U.S. The consequences are severe for exporting a product or technology in violation of these laws. While MSA has processes in place to account for licenses when necessary, associates should contact the MSA Law Department when unsure of whether a particular product or technology is subject to a licensing requirement.

U.S. law also establishes "foreign asset controls." These are economic sanctions or embargoes the U.S. places on certain countries or groups, consistent with present U.S. foreign policy. These controls apply to U.S. citizens, residents and companies, and in some cases to international subsidiaries of U.S. companies. The MSA Trade Sanctions Compliance Policy contains a list of sanctioned countries. A list of sanctioned entities can be obtained through the MSA Law Department.

Associates who have knowledge, or even suspicion, that a transaction may involve a possible violation of any of the above laws, should immediately report it to the MSA Law Department or the MSA Ethics Guideline.

#### **ENVIRONMENTAL COMPLIANCE**

(SOURCE: ENVIRONMENTAL MANAGEMENT AND COMPLIANCE POLICY)

Not only is MSA dedicated to strict compliance with all applicable environmental laws, but we are also committed to conducting our business in a manner that protects the natural resources of our environment. This dedication encompasses the integration of sound environmental practices into our business decisions.

MSA is subject to dozens of federal, state and local environmental laws and regulations. Each facility is responsible for ensuring compliance with all applicable environmental laws and regulations, and the MSA Law Department assists in these compliance efforts on a regular basis.

Facilities must obtain regulatory permits when required and must understand the terms, conditions and reporting requirements of all permits they hold. In addition, we continually strive for source reduction and are committed to ensuring that all waste is stored, transported and disposed of in accordance with applicable laws and MSA standards. We also understand that we must respond appropriately to any spill or release, in accordance with existing company procedures.



We are starting up a new manufacturing process in my facility, and it includes the discharge of waste water. One of the other technicians told me to connect the discharge hose to a near-by floor drain. I asked him if our supervisor was OK with it, and he told me not to worry about it. Should I pursue this?

Yes. If you believe he told you something wrong, you should address it with your supervisor, your human resources representative, the MSA Law Department or the MSA Ethics Guideline. The company is committed to strict compliance and protection of the environment.

We recently closed on a large sale to a government customer overseas. Unfortunately, the commission agent who helped us get the business wants us to send its payment to a bank account in a different, obscure country. Is that suspicious?

This is a red flag that should be pursued. If the commission agent is qualified to carry out business in the country where we were awarded the business, then it should also be willing to accept payment there. This conduct should be reviewed with the MSA Law Department before any action is taken.

We received a large order from a company overseas that we have never sold to before. Do I need to do anything before I can sell/export our products to this customer?

Yes, there are "user export controls" that must be reviewed. These are end user export prohibitions or restrictions that apply to certain individuals and companies specified by the U.S. government. Several U.S. government agencies produce lists containing the names and locations of these people and companies. MSA must screen the names of our buyers and the names of their end users against each of these restricted persons lists before completing a proposed export transaction from the U.S. Contact the Law Department with any questions before proceeding.



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