



CORPORATE OFFICE

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Truck-Lite Co., LLC Code of Business Conduct and Ethics

This Code of Business Conduct and Ethics is our guide to ethical decision-making. We are committed to uncompromising integrity in all that we do and how we relate to each other, to our suppliers or customers. Simply complying with the law is not enough. In this respect, the Code reflects the values that define us and the principle that we must strive to avoid any circumstances that may give rise to even an appearance of impropriety.

Compliance with Laws, Rules, Regulations and Agreements

It is our policy to be a good “corporate citizen.” Wherever we do business, our employees and business partners are required to comply with all applicable laws, rules and regulations. The standards in this Code must of course be interpreted in light of the law and practices of the countries where we operate, as well as good common sense. Reasons such as “everyone does it” or “it’s not illegal” are unacceptable as excuses for violating our Code. Any suspected or actual violation of any applicable law, rule or regulation or our contractual undertakings should be reported immediately to the employee’s immediate supervisor or a member of Truck-Lite’s executive team.

Conflicts of Interest

A conflict of interest occurs whenever our private interests interfere with the interests of the Company as a whole. Employees must refrain from entering into relationships that might impair their judgment as to what is best for the Company and business partners have to refrain from getting Truck-Lite’s employees in these relationships. Even relationships that give the appearance of a conflict of interest should be avoided. Avoid these standards by acting through someone else, such as a friend or family member will not be acceptable either.

There are many different ways in which conflicts of interest arise. For example, personal financial interests, obligations to another company, a charity or governmental entity or the desire to help a relative or friend are all factors that might divide loyalties.

Employees or business partners who believe it is not possible to avoid a conflict of interest must bring this to the attention of their immediate supervisor or a member of Truck-Lite’s executive team.

Outside Employment and Directorships

Employees may not work for or receive compensation for services from any competitor, customer, truck or trailer manufacturer, lender or supplier without the approval of a member of Truck-Lite's executive team. In addition, employees may not serve on the board of directors of another company or of a governmental agency without the advance approval. Even where approval is granted, employees must take appropriate steps to separate Company and non-Company activities.

Investments

Employees may not knowingly have financial interests in any competitor, customer, truck or trailer manufacturer, lender or supplier where this would influence, or appear to influence, their actions on behalf of the Company without advance approval.

Acceptance of Gifts and Entertainment

The acceptance of gifts and entertainment by employees or members of their family may present a conflict of interest. While employees are permitted to accept gifts of nominal value, such as unsolicited promotional items, they are prohibited from accepting anything that might reasonably be deemed to affect their judgment without the consent of their supervisor or, in the case of management level employees, the President of the Company. In no event shall any employee accept a gift that is accompanied by any express or implied understanding that the recipient is in any way obligated to do something in exchange for the gift. Similarly, employees may accept entertainment, but only insofar as it is reasonable in the context of the business at hand and is in accordance with the procedures and limits set forth above. Employees are strictly prohibited from soliciting gifts, gratuities or business courtesies for themselves or for the benefit of any family member or friend.