

Procedure Title: Ethics Hotline		Procedure Number: HR - 034
Approved By: Jerome Eymard	Date: 2/13/2018	Revision: (4)
Approved By: Craig Roussel	Date: 2/13/2018	Supersedes Revision: (3) Dated 11/27/2017

The Company has policies regarding equal employment opportunity, all forms of workplace harassment including sexual and hostile environment harassment, non-retaliation and the reporting by employees of improper, unethical or illegal conduct or activity. Additional information about these policies can be found in our Statement of Core Values, Code of Conduct, Equal Employment Opportunity Policy, Unlawful Harassment and various other Company policies. Many of these policies are posted throughout our facilities or are available for review in Human Resources.

The Company recognizes that problems, misunderstandings and frustrations may arise in the workplace. It is the intent of the Company to be responsive to our employees and their concerns. Therefore an employee who is confronted with a problem or concern may use the procedures described in this policy to resolve or clarify his or her concern.

The Ethics Hotline Policy and the Ethics Hotline are administered by the Chief Administrative Officer (CAO), who reports directly to the President and Chief Executive Officer (CEO). The Ethics Hotline was created to provide a way for employees to leave anonymous and confidential (if desired) reports of concerns or complaints regarding unjust treatment, any violation of a Company policy or any suspected improper, unethical or illegal conduct or activities. Access to the Ethics Hotline is limited to the Chief Administrative Officer and the President and CEO.

Reporting

All Company employees are required to promptly report to management any conduct or activity that they believe may be in violation of any Company policy or may give rise to legal or ethical violations. This includes but is not limited to discrimination; harassment; retaliation; fraud; unethical or unlawful conduct; improper conduct regarding accounting, internal accounting controls or auditing matters; violations of local, state or federal laws or any other violation.

Specific examples of activities or behavior that should be reported include, but are not limited to:

- violations of Company policy;
- improper, unethical, illegal or fraudulent conduct;
- theft of Company property;
- waste, including waste of funds;
- gross mismanagement;
- gross negligence of job duties;
- data piracy;
- violation of health and safety laws;
- violation of environmental laws;
- drugs, alcohol or weapons in the workplace;
- thefts, bribes or kickbacks;
- harassment in any form; and
- discrimination in any form.

These reports should be made to an employee's direct supervisor or manager within the employee's chain of management.

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If the discussion with the direct supervisor or manager within the employee's chain of management does not resolve the issue, or if the employee receives no response to the concern, or if an employee feels uncomfortable making a report in such a manner, then the employee may report the conduct or activity directly to the CAO or to the Human Resources Director, at the numbers provided at the end of this policy. Such reports may be made in a confidential manner.

Ethics Hotline

If an employee feels uncomfortable directly reporting any unjust treatment, violation of a Company policy or suspected improper, unethical or illegal conduct or activity, then the employee may anonymously report the conduct or activity directly via the Ethics Hotline.

Anonymous reports of any unjust treatment, any violation of a Company policy or any suspected improper, unethical or illegal conduct or activity may be reported seven days a week, 24-hours a day by:

- dialing 985-354-5023, or
- dialing the toll-free number 1-888-854-5023

Caller identification is specifically disabled on the Ethics Hotline so that no record of the caller will be known or in any way maintained.

Not less frequently than every other business day, the CAO will review messages left on the Ethics Hotline and will record the messages in a confidential log containing the following information:

- date of message;
- summary of the issue raised;
- operating area to which the issue pertains;
- individual(s) identified (if any);
- person to whom issues are referred and date of referral;
- action to be taken;
- date for follow-up / resolution; and
- status.

As often as necessary, but at least weekly, the CAO will meet with individuals to whom issues are referred in order to verify activity, review investigations, etc.

As often as necessary, but at least monthly, the CAO will report to the President and CEO regarding the status of all reports received by the Ethics Hotline.

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Investigations

Once any unjust treatment, any violation of a Company policy or any suspected improper, unethical or illegal conduct or activity is reported, the Company will endeavor to deal with all disclosures under this policy and to complete any and all related investigations in a timely manner. If the person making such report has identified himself or herself and provided contact information, the Company may keep such person informed as to the status and outcome of the investigation to the extent permitted by law or otherwise appropriate under the circumstances. Due to the confidential nature of some investigations, it may not be possible to provide some specific details of the investigation or the actions taken.

All investigations will be handled with sensitivity. Confidentiality will be maintained to the extent possible and appropriate under the circumstances, in light of the important privacy interests of all concerned.

In the process of an investigation, it may be necessary for the CAO to share the issue with and enlist the assistance of other members of management or staff. In that event anyone involved in the investigation will be responsible for maintaining the confidentiality of the report and the investigation. Only those with a legitimate need to know will be involved in the process.

In the course of any investigation, if it is substantiated that any Company employee has engaged in any unjust treatment, any violation of a Company policy or any improper, unethical or illegal conduct or activity, or if any employee had knowledge of any unjust treatment, any violation of a Company policy or any improper, unethical or illegal conduct or activity and failed to report it, that employee may be subject to corrective action, up to and including termination.

Non-retaliation

The law and the Company's policies expressly prohibit any form of retaliation against employees who in good faith and for lawful purposes report, cause to be reported, or assist in the investigation of suspected violations of a Company policy or any suspected improper, unethical or illegal conduct or activities by anyone at the Company. As such, the Company will not discharge, demote, suspend, threaten, harass, retaliate, or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints according to this policy.

If an employee believes that he/she has been retaliated against (including any threat or harassment), the employee should report it immediately to the employee's direct supervisor or manager within the employee's chain of management. If the employee feels uncomfortable reporting the retaliation to their direct supervisor or manager within the employee's chain of management, then the employee may report the conduct or activity directly to the Chief Administrative Officer or to the Human Resources Director, at the numbers provided below.

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Information and Resources

Chief Administrative Officer, Craig Roussel, 985-532-7214 (W), 985-413-0057 (C)

Human Resources Director, Jerome Eymard, 985-532-7246 (W), 985-855-4191 (C)