

Monarch Cement of Iowa, Inc. Ethics Policy

1. Overview

Monarch Cement of Iowa, Inc.'s (Monarch) purpose for this ethics policy is to establish a culture of openness, trust and integrity in business practices. Effective ethics is a team effort involving the participation and support of every Monarch employee. All employees should familiarize themselves with the ethics guidelines that follow this introduction.

Monarch is committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

Monarch will not tolerate any wrongdoing or impropriety at anytime. Monarch will take the appropriate measures and act quickly in correcting the issue if the ethical code is broken. Any infractions of this code of ethics will not be tolerated.

2. Purpose

Our purpose for authoring a publication on ethics is to emphasize the employee's and consumer's expectation to be treated to fair business practices. This policy will serve to guide business behavior to ensure ethical conduct.

3. Scope

This policy applies to employees, contractors, consultants, temporaries and other workers at Monarch, including all personnel affiliated with third parties.

4. Policy

Executive Commitment to Ethics

- Top management within Monarch must set a prime example. In any business practice, honesty and integrity must be top priority for executives.
- Executives must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the work force.
- Executives must disclose any conflict of interests regarding their position within Monarch.

Employee Commitment to Ethics

- Monarch employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- Every employee needs to apply effort and intelligence in maintaining ethics value.
- Employees must disclose any conflict of interests regarding their position within Monarch.

• Employees will help Monarch to increase customer and vendor satisfaction by providing quality products and timely response to inquiries.

Company Awareness

- Ethical conduct within interpersonal communications of employees is to be promoted at all times.
- Monarch will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

Maintaining Ethical Practices

- Monarch will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager and director needs to consistently maintain an ethical stance and support ethical behavior.
- Employees at Monarch should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.

Unethical Behavior

- Monarch will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- Monarch will not tolerate harassment or discrimination.
- Unauthorized use of company trade secrets and marketing, operational, personnel, financial, source code and technical information integral to the success of our company will not be tolerated.
- Monarch will not permit impropriety at any time, and we will act ethically and responsibly in accordance with laws.
- Monarch employees will not use corporate assets or business relationships for personal use or gain.

5. Enforcement

- Any infractions of this code of ethics will not be tolerated and Monarch will act quickly in correcting the issue if the ethical code is broken.
- Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.