

New Enterprise Stone & Lime Co., Inc.

Code of Ethics

- Since 1924, New Enterprise Stone & Lime Co., Inc. has been serving customers and communities throughout Pennsylvania and New York. A company does not make that kind of mark in its industry unless it earns it through hard work, expertise, and an impeccable reputation. As a Company, New Enterprise Stone & Lime Co., Inc. (NESL) prides ourselves on having a culture of openness, trust and integrity and a commitment to always doing the right thing.
- Our reputation has been built on two of our most important core values: honesty and integrity. We stand firm by our principles and we are committed to doing the right thing, regardless of the consequences. We promote open and direct communication and we are true to our word.
- As part of this culture, we have developed and instituted a Code of Ethics that is specifically designed to be part of an effective program to prevent and detect violations of law and conduct. The NESL ethics program includes a third party reporting service (Lighthouse Services, Inc.) that employees, customers and vendors can use to report fraud, unlawful, unethical and other types of improper behavior in a confidential and anonymous manner.
- A copy of the NESL Code of Ethics and information regarding the third party reporting service is attached to this letter. Please take some time to review this information and, should you have any concerns regarding fraud, unlawful, unethical or improper behavior on the part of any NESL employee, I would encourage you to use this service to report your concern anonymously. Please understand, however, that this service should not be used as a substitute for routine communications with our Company. Normal business issues should be communicated to your typical point of contact at NESL.
- To ensure our colleagues and business partners embrace and reflect these values every day, our Code of Ethics was developed as a set of guidelines for ethical behavior. Conducting business with integrity sometimes requires difficult choices, and adhering to this Code of Ethics helps us make the right decisions. While our Code of Ethics is comprehensive, it obviously can't cover every situation you may face. When that happens, use common sense. If you're still at all unsure about a course of action, just ask a supervisor, Human Resources, the Internal Audit Department, or place an anonymous call to the Ethics Hotline. We remain steadfast in our pledge that we will not tolerate retaliation against any employee who, in good faith, brings forward a potential Code of Ethics issue.
- Our employees, customers, and stakeholders trust us to provide high-quality reliable services with integrity. It's our job, and it's just the right thing to do.

Overview

As used in this Code of Ethics, "we" refers to every member of the Board of Directors and every NESL employee, regardless of title or position. References in this Code of Ethics to "NESL" or "New Enterprise Stone & Lime Co., Inc." include all Divisions and Subsidiaries of New Enterprise Stone & Lime Co., Inc.

Code of Ethics

The Board of Directors of New Enterprise Stone & Lime Co., Inc. (NESL) recognizes its responsibility to operate and conduct the business of the company with high ethical standards. It is our intention to respect the interests of our employees, customers, suppliers, members of the community, and shareholders.

Employees

It is our duty and obligation to respect and follow, the laws of the municipal, State and Federal governments. Employees are expected to follow this principle, and every supervisor is to exercise diligence to ensure this instruction is being carried out. Furthermore, we will cooperate with these governments on all related matters.

Every effort will be made to hire employees with high ethical standards who will accept it as their duty to ensure that everything within their area of responsibility is conducted with a high sense of moral obligation in both company and personal responsibilities. We intend to conduct our business to provide maximum job opportunities for fair and equitable earnings, equal consideration for advancement, fair and dignified treatment, safe and healthy working conditions, and fair social benefits. We fully support State and Federal employment policies that all persons are entitled to equal employment opportunities without regard to race, color, religion, sex, age, national origin, disability, or status as a veteran.

Every person on the NESL payroll owes his or her first business allegiance to NESL. It is our policy that outside business interests conflicting with the primary job responsibilities be reported to ensure that NESL's interests will not be jeopardized in any way. Employees should not accept gifts, loans, or other favors when either NESL or the individual would be under any obligation.

Each employee shall recognize and respect the ownership of company property. No company-owned product, goods, services, or other owned property will be converted to personal use or personal gain without written permission from his or her division leader. This specifically includes the use or removal of company equipment and materials.

Customers

We will deal honestly and fairly with our customers while recognizing that we are entitled to their business only if we earn it through products of high quality, good service, and fair prices. We intend to compete as actively as we can for customers' orders; however, we will do so on a highly ethical level.

Suppliers

We believe our suppliers are entitled to courteous, honest, and fair treatment, but we insist they recognize we will chose suppliers that are most advantageous to NESL.

Community

It is our intention to be a good citizen and neighbor in the community. We will respect the rights of others in the community, especially those with property near ours. We will support projects that will benefit the community and the company by encouraging employees to assume leadership in educational, religious, political, and civic organizations.

Shareholders

We recognize that NESL shareholders are entitled to a fair return and protection of their investment.

Compliance

This Code of Ethics supplements, but does not replace other NESL policies and procedures. Employee questions or violations should be communicated to a supervisor, Human Resources, or the Internal Audit Department through the available reporting methods. Any employee who violates or circumvents the Code of Ethics may be subject to disciplinary action up to and including termination.



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or go to:

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A SERVICE PROVIDED BY LIGHTHOUSE SERVICES, Inc.
Confidentiality Commitment

Lighthouse is an independent provider that assists your company to identify improper activity. We are committed to protecting the identity of all persons who use our secure reporting system. Reports are submitted by Lighthouse to the company's designee, and may or may not be investigated at the sole discretion of the company. Although we will not disclose your identity without your express permission, it is possible that your identity may be discovered during an investigation of the matter reported because of information you have provided.



New Enterprise Stone & Lime Co.,
Inc. provides a reporting hotline for
employees to anonymously report any
of the following incidents:

- Ethical Violations
- Wrongful Discharge
- Unsafe Working Conditions
- Internal Controls
- Quality of Service
- Vandalism and Sabotage
- Theft
- Improper Conduct
- Discrimination
- Conduct Violations
- Alcohol and Substance Abuse
- Threats
- Fraud
- Bribery and Kickbacks
- Conflict of Interest
- Misuse of Company Property
- Theft and Embezzlement
- Violation of Company Policy
- Violation of the Law
- Falsification of Contracts,
Reports or Records

Regular business issues and
matters not requiring anonymity
should be directed to the employee's
supervisor or HR department.