

Code of Business Conduct and Ethics Hotline

Policy 114

Original Date: 12/19/2006, Revised 08/01/2007 (Version 2)

Purpose

The purpose of this hotline policy is to ensure the timely identification and resolution of all issues related to the Code of Business Conduct and Ethics Compliance Program. Employees are encouraged to report problems or concerns via the hotline number (1-800-826-6762 – United States only) when they believe a potential violation has taken place. For our international employees, please see country code calling instructions below. Callers may elect to remain anonymous or divulge their name in a confidential manner.

Policy

To promote a culture of legal and regulatory compliance for its Code of Business Conduct and Ethics Compliance Program, Altra Holdings, Inc. has established a problem resolution process and a strict nonretaliation guideline to protect employees who report problems and/or concerns with honest intentions.

Procedures / Guidelines

1. All employees have the responsibility to report real or perceived misconduct, including actual or potential violations of law, regulation, and the Code of Business Conduct and Ethics Compliance (Refer to the Code of Business Conduct and Ethics Compliance Program). Failure to report a suspected or known violation may result in appropriate disciplinary action, up to and including discharge.
2. We have established and will maintain a Code of Business Conduct and Ethics Compliance telephone hotline, available 24 hours a day, 365 days a year, that employees may use to report problems and/or concerns either anonymously or in confidence. This hotline is administered by an outside company, National Hotline Services (NHS).
3. The telephone number will be made readily available to all employees by conspicuously posting the telephone number in common work areas and in other ways.
4. Employees who report problems and concerns via the hotline, with honest intentions, will be protected from any form of retaliation or retribution. Any form of retaliation against any employee who reports a real or perceived problem or concern in honest intentions is strictly prohibited, and any employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination.
5. Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining appropriate disciplinary action.
6. This hotline is intended to address any concerns or violations of the Code of Business Conduct and Ethics Compliance program. It is not intended to address day to day employment or policy questions, concerns, or issues. The standard avenues currently in place for addressing those day to day issues

7. The hotline will be answered by a live NHS employee who will debrief the caller and file a confidential report with Altra's Compliance Officer on all information provided by the caller, except the name of the caller, if so desired. All call records will be logged and sequentially numbered upon receipt and placed in the care and custody of NHS.
8. In addition to the live operator, the caller will hear a pre-recorded message explaining their rights, any limitations, the Company's strict non retaliation policy and other pertinent information.
9. No attempt will be made by NHS to identify a caller who requests anonymity. However, if the caller chooses to disclose their identity, it will be held in confidence to the fullest extent allowed by law.
10. The Compliance Officer will then follow up the report with an internal investigation. The Compliance Officer will communicate with any and all employees, with whom it is necessary in order to fully investigate the complaint.
11. When a new hotline report is submitted to NHS, all callers will be assigned a confidential report number and asked to contact the hotline in ten business days for any required follow-up. It is the responsibility of the Compliance Officer to ensure any required follow-up information is provided to the hotline in advance of the scheduled call-back date.
12. The compliance officer will ensure that all hotline calls are addressed in an appropriate and timely manner, as well as in accordance with these and all related policies and procedures. Other responsibilities include:
 - ensuring proper functioning of the hotline
 - establishing reporting and records maintenance procedures
 - providing feedback to callers when necessary
 - reporting hotline activity to management.
13. All those who are engaged in the hotline process, including the Compliance Officer, are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner.

COUNTRY CODE DIALING INTO THE UNITED STATES HOTLINE TELEPHONE NUMBER: Dial the country code access number, wait for the prompt, which will be a live voice or a recorded message instructing you to enter the toll-free hotline number. Remember, you must wait for the prompt before dialing the toll-free number.

United States	1-800-826-6762		
Australia	1-800-551-155 prompt	1-800-826-6762	(Optus phone provider)
	1-800-881-011 prompt		(Telstra phone provider)
Canada	1-800-225-5288 prompt	1-800-826-6762	
China	108-888 prompt	1-800-826-6762	(North Region; Beijing and vicinity)
	108-11 prompt		(Southern Region; Shanghai and vicinity)
France	0800-99-0011 prompt	1-800-826-6762	
	0805-701-288 prompt		
	(alternate if the first code does not connect)		
Germany	0-800-2255-288 prompt	1-800-826-6762	
Hong Kong	800-96-1111 prompt	1-800-826-6762	(Hong Kong Telephone phone provider)
	800-93-2266 prompt		(New World Telephone phone provider)
Thailand	1-800-0001-33 prompt	1-800-826-6762	
	001-999-111-11 prompt	1-800-826-6762	
	(alternate if the first code does not connect)		
Taiwan	00-801-10-288-0 prompt	1-800-826-6762	
Singapore	800-0111-111 prompt	1-800-826-6762	(SingTel phone provider)
	80-0001-0001 prompt		(StarHub phone provider)
United Kingdom	0800-89-0011 prompt	1-800-826-6762	(BT phone provider)
	0500-89-0011 prompt	1-800-826-6762	(C&W phone provider)