



**ROHRER CORPORATION
CODE OF BUSINESS CONDUCT**

1. Our Code's Purpose

A. *What Is Our Code?*

This Code of Business Conduct (the “*Code*”) has been adopted by the Board of Directors of Rohrer Corporation (“*Company*,” “*we*,” “*us*,” or “*our*”) to ensure that everything we do is of the highest standard of ethical conduct and fair dealing. At Rohrer, our reputation is a valuable asset, and we must continually earn the trust, confidence and respect of our vendors, customers, and the community. Our Code provides general guidelines on the ethical principles that we must follow, but no guideline can anticipate all situations. Our Code incorporates by reference our employee handbook and various other conduct policies that have been adopted by the Company. Additional policies may be adopted by the Company from time to time. All such conduct policies shall be deemed incorporated into this Code by reference upon their adoption.

B. *Who Is Bound by Our Code?*

Our Code sets out basic principles to guide all directors, officers, and employees of the Company and its subsidiaries. We also expect our agents and representatives, including consultants, to observe our Code's standards when conducting business with and for the Company.

C. *What Are Our Expectations?*

We expect everyone to read this Code, abide by this Code, and seek to avoid even the appearance of impropriety. If you violate the standards in our Code, you may be subject to disciplinary action, up to and including immediate termination of employment. Nothing in our Code modifies the at-will employment relationship with our employees except as otherwise set forth in a written agreement signed by an executive officer of the Company. We have included information in this Code about who to contact with questions, concerns or to report violations of this Code.

D. *Why Do We Have Our Code?*

Our Code seeks to deter wrongdoing and to promote:

- honest and ethical conduct, in all of our business dealings, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely, and understandable public communications;
- full compliance with all laws, rules, and regulations that are applicable to our business;
- prompt internal reporting of Code violations to appropriate personnel; and
- accountability for ethical conduct.

2. Marketplace Standards

A. *Making Good Decisions: Compliance with Laws and Regulations*

All Company activities are to be conducted in compliance with the letter and spirit of all laws and regulations. Our Code is designed to provide assistance to our employees in engaging in lawful and



ethical conduct. Laws and regulations can sometimes be complex and difficult to interpret. Although you are not expected to understand every detail of the laws and regulations that apply to you, it is important to know enough to determine when to seek advice from managers or other appropriate personnel.

We are committed to continuously review and update our policies and procedures to always ensure best practices and adherence to the ethics of our industry. Therefore, our Code may be modified from time to time in the future.

B. *Public Disclosure of Information*

Only authorized representatives of the Company may make public statements, such as the issuing of a press release, public presentations, public speeches, and publishing of articles. No employee, officer, or director may make any such public statements without first obtaining written approval from the Company. The Company expects all directors, officers, and employees who are involved in the creation of any public documents to ensure that the information disclosed in those documents is full, fair, accurate, timely, and complete.

C. *Conflicts of Interest*

A conflict of interest exists when personal interests interfere, conflict, or appear to interfere or conflict in any way with the interests of the Company. Conflicts of interest may not always be clear, so if you have a question, you should consult with your manager or our Chief Financial Officer or Chief Human Resources Officer. If you become aware of a conflict or potential conflict, you should bring it to the attention of your manager or other appropriate personnel or consult the Compliance Procedures section of this Code.

Conflicts of interest are prohibited. In rare instances, a waiver of a conflict of interest may be granted to an employee by our Chief Financial Officer or Chief Human Resources Officer. A director, executive officer, or member of our executive team may be granted a waiver with the written consent of the Company's board of directors (the "***Board of Directors***").

It is impossible to list all of the different types of potential conflicts of interest that can arise, but here are some examples that you must disclose to the Company's senior management for their consideration:

- When you or a family member receives a personal benefit in relation to your position at the Company.
- Acting as an employee, consultant, officer, or director of a competitor, business partner, supplier, or customer of the Company.
- Investing in or owning a financial interest in a competitor, business partner, supplier, or customer of the Company. The following factors may prohibit such an investment:
 - the size and nature of the investment;
 - your ability to influence decisions of the Company or of the other company; and
 - the nature of the relationship between the Company and the other company.



- Conducting Company business with an immediate family member or someone who shares your household, or with a business that such person is associated with in any significant role.

*Immediate family members include a person's spouse, sister, brother, daughter, son, mother, father, grandparents, aunts, uncles, nieces, nephews, cousins, step relationships and in-laws.

D. *Responsible Communications and Social Media Use*

The Company is dedicated to communicating with the public honestly and responsibly. Social media is a tool that can build positive relationships if used correctly yet cause irreparable harm if abused.

Only authorized representatives of the Company may use social media accounts that are owned by the Company. You are not prevented from personal social media activities that are protected under the law, but you must always use good judgment and common sense. If you post communications on social media or other publicly available or private online platforms or forums, you must clearly state that any opinions you express are your own, and that they do not represent the Company's beliefs. You may not under any circumstance, represent that you are communicating on behalf of the Company unless such communication is a part of your formal business responsibilities or functions (e.g., formal marketing communications) and approved by the Company. You should never post any confidential or proprietary information about the Company or post personal information about the officers, directors or personnel of the Company without such individual's express permission.

E. *Corporate Opportunities*

All employees, officers, and directors have a duty to advance the legitimate interests of the Company.

- You may not use corporate property or information obtained through your position with the Company for improper personal gain.
- You may not compete with the Company directly or indirectly.
- You may not take for yourself any opportunity that is discovered, in whole or in part, through use of corporate property, information, or position without the informed prior consent of the Board.

F. *Competition and Fair Dealing*

The Company intends to be a leader in its industry while using fair and honest business practices. Using or disclosing, or encouraging others to use or disclose, other companies' proprietary, confidential, or trade secret information without the owner's prior consent is strictly prohibited. Any theft or misappropriation of such information is also strictly prohibited. You should endeavor to respect the rights of and deal fairly with the Company's competitors, business partners, suppliers, and customers.

The Company is also subject to competition laws that can vary country by country and impact how we can engage with others in the marketplace.



Violations of competition laws can include agreements among competitors to:

- Fix or control prices.
- Boycott specified suppliers or customers.
- Allocate customers, products, territories, or markets.
- Limit the production or sale of products.

Violations of these laws can result in heavy penalties for the company and the individuals involved. Company persons must understand the applicable laws and consult with their manager, or the Company's Chief Financial Officer or Chief Human Resources Officer whenever anything is unclear.

G. *Gifts*

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, and not to gain an unfair advantage with customers or other business partners. No gift or entertainment should ever be offered, given, provided, or accepted by you unless it:

- is not a cash gift;
- is consistent with customary business practices;
- is of nominal value;
- cannot be construed as a bribe or payoff; and
- does not violate any laws or regulations.

In addition, many laws and regulations strictly limit the business gratuities that may be accepted by government personnel. Promising, offering or giving a gift, favor, hospitality, entertainment or other gratuity to a government official or employee would not only violate this Code, but could also be a criminal offense. Company persons must obtain approval from our Chief Financial Officer or Chief Human Resources Officer prior to making any gifts or offering any hospitality to any government official. If you have questions or concerns about the giving or accepting of gifts or proposed gifts by yourself or others, please discuss your concerns with your manager, or with the Chief Financial Officer or Chief Human Resources Officer.

H. *Protecting the Environment & Responsible Sourcing*

The Company is committed to respecting and protecting the environment. In maintaining our environmental policies and practices, our potential impact on the environment will be considered at all levels of the Company, including our Board of Directors and senior management.

The Company converts raw materials received from its suppliers into custom packaging products, it does not manufacture, produce, assemble, process, handle, distribute, store, sell or otherwise transfer chemical substances. The Company is committed to sourcing materials that are produced in environmentally and socially responsible ways. We choose suppliers who are able and willing to meet these requirements. Through our Supplier Code of Conduct we also engage our supply chain in committing to full compliance with all applicable laws, rules and regulations and certain



industry guidelines for such responsible sourcing. This includes but is not limited to rules regarding:

- Conflict minerals
- Forced labor/ Child labor
- Toxic chemicals
- International trade and economic sanctions

The Company is committed to remediating any non-compliance including through supplier termination. If you become aware of any unsafe storage of toxic or hazardous materials, or believe a supplier is violating our standards, please notify the EHS Department immediately.

I. *Prevention of Corruption*

The Company is committed to obtaining business in an ethical way and is also committed to acting in an ethical and fair way when awarding business. Company persons must always act with this principle in mind. Company persons must avoid not only actions that would lead to a violation of bribery, corruption, or money-laundering laws, but also the appearance of impropriety of this nature.

In addition, many global anti-bribery and anti-corruption laws criminalize making or receiving bribes, kickbacks, and other improper payments to obtain or award business. This includes the U.S. Foreign Corrupt Practices Act (FCPA) which prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates to obtain or retain business. However, our Company's commitment and global laws go beyond the FCPA's focus on government officials. Both the Company and global laws prohibit commercial bribery as well.

Our employees, directors, officers, and contractors do not offer or accept bribes from anyone.

The actions of third parties on behalf of or to retain business for the company can lead to the company being in violation of global anti-bribery and anti-corruption laws.

Compliance with our anti-bribery and anti-corruption policies is monitored at all levels of the company, including by the Board of Directors and senior management.

A current copy of our Anti-Bribery and Anti-Corruption Policy is attached to this Code as Annex A. Our Chief Financial Officer or Chief Human Resources Officer can provide guidance if you have any questions or concerns about whether a certain action could be considered bribery or corruption.



J. International Trade and Economic Sanctions

The Company's operations and transactions are subject to numerous international trade rules. This includes import and export requirements and economic sanctions. Controls can apply to not only tangible goods, but also financial transactions, working with and paying companies or contractors in sanctioned countries, and transmissions of technology or software.

Company persons who are involved with any international activity have an obligation to understand and comply with applicable international trade requirements.

3. Workplace Standards

A. *Employment Policy*

This Code is supplementary to the employment policies reflected in the Company Employee Handbook. Unless otherwise agreed to in writing, employees are employed by the Company on an at-will basis. At-will employment generally means that employment is not guaranteed for any particular amount of time and both you and the Company are free to terminate the employment relationship, with or without cause, at any time.

B. *Discrimination, Harassment, and Retaliation*

The diversity of the Company's employees is an integral asset to our business and culture. The Company is firmly committed to providing equal opportunity in all aspects of employment and to aim for appropriate representation of gender, race, and ethnicity at every level of our Company, including our Board of Directors, senior management, and all employees.

We will not tolerate any discrimination, harassment, or retaliation of any kind, including any such actions based on gender, race, disability, ethnicity, nationality, religion, sexual orientation, or gender identity or expression.

Equal opportunity is part of our respectful workplace and, as such, employment-related decisions are never based on age, marital status, gender, race, ethnicity, nationality, religion, sexual orientation, gender identity or expression, or any other characteristic protected by law. Equal opportunity applies to all employment practices, including recruiting, hiring, compensation, performance reviews, training and development, promotions, and other terms and conditions of employment.

All directors, officers, and employees are required to treat colleagues professionally and with dignity and respect — this is a critical element of our business and culture. The Company does not tolerate abuse or harassment of any kind. Harassment can come in many forms, and it includes any unwelcome behavior that makes someone feel uncomfortable or disrespected. Harassment often leads to poor performance — both by the Company as a whole and by individual employees. All complaints of harassment will be investigated promptly and discreetly. The Company prohibits retaliation for reports of misconduct that are made in good faith.



C. *Health and Safety*

The Company strives to provide its employees with a safe and healthy work environment. You are responsible for helping to maintain a safe and healthy workplace for all employees by following safety and health rules and immediately reporting accidents, injuries and unsafe equipment, practices, or conditions. Nothing, including urgent business needs or cost concerns, justifies failing to follow the Company's policies and procedures with respect to environment, occupational health, and safety. Employees should notify their supervisors or the EHS Department of any unsafe and hazardous conditions in the workplace.

Violence and threatening behavior are not permitted. Employees must report to work in condition to perform their duties, free from the influence of alcohol or illegal drugs. The abuse of alcohol or illegal drugs in the workplace will not be tolerated and may result in the termination of your employment.

Good Workplace Practices:

- Always treat one another respectfully and appropriately.
- Speak up if you feel harassed or believe someone else has been harassed.
- Never take shortcuts or use poor judgment regarding health or safety.

D. *Human Rights Policy & Labor Practices*

Upholding human rights reflects our dedication to ethical business and labor practices. The Company shall comply with all applicable laws preventing child labor, forced labor, and human trafficking. We comply with all applicable wage and labor laws. The Company is committed to providing all employees with fair and competitive wages as compensation for high performance conducted in accordance with our Company values.

Our commitment extends from our own operations through our supply chain as further described in our Supplier Code of Conduct. If you believe a party we do business with is violating our labor or human rights standards, please notify our Chief Financial Officer, Chief Human Resources Officer or Chief Human Resources Officer immediately.

E. *Confidentiality*

Information, including products, product designs, materials, ideas, and concepts are important assets to the Company. You must maintain the confidentiality of the Company's proprietary and confidential information, as well as the confidentiality of any information entrusted to you by the Company's business partners, suppliers, and customers. The foregoing non-disclosure obligation is subject to certain exceptions where disclosure is required by law or authorized by our established written policies.

Confidential information includes all non-public information that might be of use to competitors or harmful to the Company or our business partners, suppliers, or customers if disclosed. Confidential information includes information that business partners, suppliers, and customers have entrusted to us.



The obligation to preserve confidential information continues even after employment or service ends.

Please seek guidance from your manager or the Chief Executive Officer, Chief Financial Officer, or Chief Human Resource Officer, if you are asked to disclose Confidential Information of the Company or any third party.

F. *Record Keeping*

The Company requires honest and accurate recording and reporting of information to make responsible business decisions and to comply with the law. Critical duties of good record keeping include:

- Always report the true and actual number of hours worked.
- Disclose any transaction or arrangement that relates to or arises out of your professional relationship with the Company.
- Be responsible, diligent, and accurate with business expense accounts, including understanding what is reimbursable, according to the Company's policies.
- Always be accurate when creating financial entries.
- Unrecorded or "off the books" funds or assets should not be maintained. If you ever believe that questionable accounting or auditing conduct or practices have occurred or are occurring, report those concerns to our Chief Financial Officer or Chief Human Resources Officer.
- Business records and communications often become public, and you should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This also applies to e-mail, social media, internal memos, and formal reports.
- Records should always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the Company's Chief Financial Officer or Chief Human Resources Officer.

G. *Protection and Proper Use of Assets*

We always protect our physical, informational, and financial assets from theft or misuse. Any suspected incident of fraud or theft must be reported immediately for investigation. The Company's assets generally include the Company's cash, property (both physical and intellectual property), and ideas (both patentable and unpatentable ideas). Some rules to follow to safeguard the Company's assets include:

- Keep Company devices and laptops safe at all times and do not use them for non-Company business, though limited incidental personal use is permitted if it does not interfere with your job duties or put the Company at risk.
- Protect all proprietary information, which includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business plans, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or



distribution of such information would violate this Code and could also be illegal and result in civil or criminal penalties.

H. *Intellectual Property*

We are all responsible for protecting the intellectual property of the Company and the intellectual property of others that we learn about through our work. Some basic rules and responsibilities regarding intellectual property include:

- Every invention, patent application, and all resulting patent rights for any invention you create during your employment and in your role at the Company is the property of the Company.
- You must promptly disclose inventions to the Chief Financial Officer or Chief Human Resources Officer.
- Inventions include, but are not limited to, new products and product designs, product components, manufacturing processes, devices, methods, parts and systems, and any improvements to these types of technologies.
- Always ask your manager or contact the Company's Chief Financial Officer or Chief Human Resources Officer if you are unsure if something is intellectual property or should be treated as intellectual property.
- Immediately report to the Chief Financial Officer or Chief Human Resources Officer any concerns you might have about Company intellectual property being at risk or the use of third-party intellectual property.

4. Reporting Standards

A. *Reporting Illegal or Unethical Behavior*

You are strongly encouraged to promptly talk to our Chief Financial Officer or Chief Human Resources Officer about observed illegal or unethical behavior, including any violations of our Code, or when in doubt about the best course of action in a particular situation. The Company does not allow retaliation for reports of misconduct by others made in good faith by employees. You are expected to cooperate in any internal investigation of potential misconduct.

If you have information regarding possible violations of state or federal statutes, rules, or regulations, or violations of fiduciary responsibility by the Company, we encourage you to report it immediately to your manager or to the Chief Financial Officer or Chief Human Resources Officer. You may, on an anonymous basis, submit a good-faith concern regarding observed illegal or unethical behavior or questionable accounting or auditing matters without fear of dismissal or retaliation of any kind. To submit an anonymous report, you may call the Company's Reporting Hotline at (877) 647-3335, which is confidential and where the identity of the caller remains anonymous. You can also file a report with RedFlagReporting.com using Company Code: 3303351541.

B. *Compliance Procedures*

We must all work to ensure prompt and consistent action against violations of our Code and other policies. However, in some situations it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a



new question or problem. If you believe a violation has occurred, please refer to the process described above in “Reporting Illegal or Unethical Behavior.” Keep the following steps in mind:

- Make sure you have all the facts. To reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? These questions will enable you to focus on the specific issue you are faced with and the alternatives you have. Use your best judgment and common sense. If something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your manager. This is the basic guidance for all situations. In any cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process.

In any event, seek help from the Company’s diverse resources. In the rare case where it may not be appropriate to discuss an issue with your manager or where you do not feel comfortable approaching your manager with your question, discuss it with the Company’s Chief Financial Officer or Chief Human Resources Officer.

5. Amendments and Waivers of the Code of Conduct

Any amendment of this Code may only be made by the Board of Directors. Any waiver of this Code (i.e., a material departure from the requirements of any provision) applicable to or directed at officers or directors may only be made by the Board of Directors.

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ANNEX A
Anti-Bribery and Anti-Corruption Policy

INTRODUCTION:

Rohrer Corporation and each of its subsidiaries and affiliates (collectively, the “Company”) is committed to ethical business practices. This Policy is intended to ensure the Company’s officers, directors, and employees (collectively, “employees”) understand the laws and regulations designed to fight corruption and can meet their legal and ethical obligations to conduct business with integrity.

The Company’s employees are strictly prohibited from paying a bribe to, or receiving a bribe from, another individual or entity, public or private. In addition, employees must adhere to the Company’s internal controls that are designed to prevent corruption and safeguard Company assets and employees.

The Company requires third parties—including, but not limited to, agents, contractors, joint venture partners, consortiums, consultants, brokers, vendors, lobbyists, intermediaries, distributors, suppliers (collectively, “third parties”)—to follow standards consistent with this Policy when acting on behalf of the Company.

SCOPE:

As used in this Policy, “bribe” should be understood to have the word’s broadest possible meaning. It means giving, or making an offer or promise to give, or authorizing, soliciting, or accepting the giving of, anything of value or any other advantage, to improperly influence actions. Bribes can include money, gifts, hospitality, expenses, reciprocal favors, business, or employment opportunities, political or charitable contributions, or any other tangible or intangible benefit or consideration to improperly influence actions, whether conferred directly or indirectly. For example, improper influence can include a kickback intended to cause someone else to misuse their position to secure a benefit.

Compliance with this Policy is mandatory. Accordingly, employees and third parties must comply with both the letter and spirit of this Policy and all applicable laws. **No employee or third party will suffer adverse consequences for refusing to engage in bribery, even if this may result in the Company losing business or suffering other detriment.**

POLICY:

It is the Company’s policy to comply with all applicable anti-bribery and anti-corruption laws of the United States and the states and countries where it does business.

All employees are responsible for acquainting themselves with the legal standards and Company policies applicable to their assigned duties, including this Policy and all applicable anti-corruption laws, and to conduct themselves accordingly.



VIOLATIONS:

Violations of this Policy, including failures to comply with internal controls, may result in disciplinary action up to and including termination of employment or contract and/or referral to appropriate law enforcement authorities.

For managers, disciplinary action applies equally to those who:

- do nothing to prevent misconduct by an employee under the manager's supervision, when the manager had reason to know the employee was contemplating the misconduct;
- fail to take appropriate corrective action in response to misconduct by an employee under the manager's supervision, when the manager had reason to know of the misconduct;
- fail to ensure internal controls are adequately implemented in operations they oversee; and/or
- cover up, attempt to cover up, or minimize any misconduct committed by an employee under the manager's supervision.

Breaches of federal and state anti-corruption laws may subject the Company, an employee, or third party to civil and criminal penalties. Employees and third parties must be sensitive to potential bribery and corruption and must contact the Company's Chief Financial Officer or Chief Human Resources Officer with any questions or concerns they may have prior to taking any action that could potentially violate the law or this policy. See below for further information on obtaining guidance from the Chief Financial Officer or Chief Human Resources Officer or reporting a suspected violation as set forth below.

THIRD PARTIES:

Individual employees and the Company may be liable under federal and state anti-corruption laws for bribes offered or made by a third party, such as a sales representative, consultant, agent, distributor, supplier, or joint venture partner if the Company offers, promises, authorizes, or makes a payment or transfers other value to the third party when the Company knows or has reason to know that it will be used in whole or in part to pay a bribe. This means the Company must take steps to ensure it only engages in transactions with ethical third parties and monitor third party relationships for any signs of inappropriate behavior.

Agreements: The engagement of any third party to interact with government entities or officials on the Company's behalf must be properly authorized and such engagement must be pursuant to a form of agreement approved by the Chief Financial Officer. Such approved form of agreement will contain appropriate anti-corruption representations and warranties, including, among other things, prohibitions on improper payments to officials, audit rights, and termination rights.



Due Diligence and Monitoring: It is the Company’s policy to conduct appropriate due diligence and monitoring of third parties before entering into business relationships, as well as during the course of business relationships. “Appropriate” due diligence depends on the particular circumstances and requires attention to the appearance of any warning signs, including but not limited to: the location and nature of the services provided by the third parties; claims of special “access” or short cuts to government officials; and transactions involving high monetary value projects. The Company requires that all results of due diligence reviews be documented and recorded. After engaging a third party, employees must carefully monitor its compliance with ethical standards and legal obligations on an ongoing basis.

ACCURATE BOOKS AND RECORDS:

The Company must make and keep books, records and accounts that accurately and fairly reflect its transactions and disposition of assets in sufficient detail to facilitate a full understanding and audit trail of its transactions. No false or misleading entries may be made in the books and records of the Company for any reason. All contracts and other documents must accurately describe the transactions to which they relate. No payment on behalf of the Company may be approved without adequate supporting documentation or made with the intention or understanding that all or part of any such payment is to be used for any purpose other than that described by the documents supporting the payment.

NO EXCEPTION FOR FACILITATION PAYMENTS:

This Policy and most anti-corruption laws prohibit “facilitation payments,” which are payments intended to expedite or to secure the performance of routine governmental action where there is no discretion on the part of the government official. Generally, these are small payments to “speed up” or “encourage” an otherwise routine government action, such as expediting or processing construction or work permits.

POLITICAL AND CHARITABLE CONTRIBUTIONS:

Contributions to political parties, party officials, candidates, organizations, or individuals engaged in politics, charities, or sponsorships, whether direct or indirect, must not be a subterfuge for bribery or contrary to applicable law. Any such contributions by the Company must be pre-authorized by the Chief Financial Officer. Proper recording and accounting of contributions is essential.

EMPLOYEE TRAINING:

All relevant employees will receive training on these policies and procedures at the time of the issuance of this Policy or at the beginning of their employment and from time to time thereafter as appropriate.

REVIEW AND AUDIT:

The Company’s audit approach includes consideration and review of federal and state anti-corruption laws and issues. The annual audit plans include a risk assessment analysis of elements related to these issues, including, as appropriate, independent surveys.



The Company may also undertake appropriate special audits related to anti-corruption laws issues.

COMMUNICATIONS AND REPORTING:

Encouraging Open Communication: No policy can anticipate every situation that may arise. Accordingly, this Policy is not meant to be all-inclusive, but rather is intended to serve as a source of guiding principles and to encourage communication and dialogue concerning standards of conduct addressed in the Policy. Employees and third parties are encouraged to discuss with any member of the legal department questions or concerns about particular circumstances that may implicate the provisions of this Policy.

Reporting Obligations: Employees or third parties who believe that the Company's standards articulated in this Policy are not being practiced are required to report the circumstance to the legal department. Any reports may be made anonymously, although employees and third parties are encouraged to identify themselves to facilitate prompt and thorough investigation. To submit an anonymous report, you may call the Company's Reporting Hotline at (877) 647-3335, which is confidential and where the identity of the caller remains anonymous. You can also file a report with RedFlagReporting.com using Company Code: 3303351541.

No Retaliation: Retaliation for reports of misconduct by others made in good faith is prohibited by law, and the Company will not permit retaliation of any kind against any employee or third party who reports misconduct in good faith.