

<i>EAST PENN MANUFACTURING CO., INC.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 3	Effective Date: 5/1/01	Page 1 of 4	Change #5275
Approved By: Robert D. Harrop		Document No.: EPPM(PERS)\SEC1\2A.DOC	

Equal Employment Opportunity

EAST PENN MANUFACTURING CO., INC. has been and will continue to be an equal opportunity employer. No employee or applicant for employment will be discriminated against because of race, color, religion, national origin, sex (including sexual orientation and gender identity), handicap, age, veteran's status or any other legally protected characteristic. We will take affirmative action to make sure all applicants and employees are treated without regard to these characteristics. To carry out our policy, EAST PENN MANUFACTURING CO., INC. will make certain that:

Equal treatment will be afforded in the areas of recruiting, hiring, training and promoting applicants and employees; and in relation to compensation, benefits, transfers, company-sponsored training and education, tuition assistance, social and recreational programs, layoffs and return from layoffs.

EAST PENN MANUFACTURING CO., INC. will periodically analyze its personnel actions to ensure compliance with this policy. If, for any reason, you feel you have been discriminated against, the EEO Administrator at EAST PENN is the Vice President of Personnel, (610) 682-6361 x-2342. The Vice President of Personnel is responsible for monitoring the facility's progress toward Affirmative Action goals and is the person to contact if you believe you haven't been treated in accordance with our policy. Our Affirmative Action program is on file in the Vice President's office.

East Penn asks for your continued assistance and support in attaining the company's objective of equal employment opportunity.

Sexual and Other Unlawful Harassment

East Penn is committed to ensuring equal employment opportunity. All employment decisions, policies and practices are in accordance with applicable federal, state, and local anti-discrimination laws. Our Company will not engage in nor tolerate unlawful discrimination, including any form of unlawful harassment, on account of a person's sex (including sexual orientation and gender identity), age, race, color, religion, creed, national origin, handicap, disability or any other legally protected characteristic.

Reasonable Accommodations

The Company will make reasonable accommodations on behalf of qualified individuals with disabilities or handicaps of which the Company is aware. The Company also will make reasonable accommodations with regard to religious observances, practices, and beliefs of which the Company is aware.

Sexual Harassment

Sexual harassment is a form of illegal sex discrimination, which the Company will not tolerate. It refers to behavior based on a person's sex (including sexual orientation and gender identity) that is unwelcome, personally offensive, or interferes with our work effectiveness.

Consistent with the preceding, and according to the guidelines on sex discrimination issued by the Equal Employment Opportunity Commission, the following conduct is prohibited:

- For any person, male or female, to threaten or insinuate, expressly or implicitly, that another person is required to submit to sexual advances or to provide sexual favors as a condition of employment, continued employment, assignments, advancement, or any term, condition or benefit of employment or career development.

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- For any person, male or female, to engage in unwelcome sexually-oriented or otherwise hostile conduct which has the purpose or effect of interfering unreasonably with another person's work performance or of creating an intimidating, hostile, abusive, or offensive working environment. Examples of such conduct, if unwelcome, may include (but are not limited to): sexual bantering; "jokes" and "teasing"; off-color language or jokes, sexual flirtations, advances, or propositions; requests for sexual favors; verbal abuse of a sexual nature; verbal commentaries about an individual's body or sexuality; sexually-degrading words used to describe individuals; displays of sexually-oriented or degrading gestures or other nonverbal communications.

Each employee is responsible to respect the rights of their co-workers and to assist in the prevention of sexual harassment through the following acts:

- Refraining from participation in, or encouragement of, actions that could be perceived as sexual harassment.
- Reporting acts of harassment in accordance with this policy.
- Encouraging any employee, who confides that he or she is being harassed, to report such acts in accordance with this Policy.

Each supervisor and member of management shall be responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise and for preventing acts of harassment. This responsibility includes:

- Monitoring the work environment on a daily basis for signs that harassment may be occurring.
- Counseling all employees on the types of behavior prohibited, and the procedures for reporting and resolving complaints of harassment.
- Stopping any observed acts that may be considered harassment, and taking appropriate steps to intervene, whether or not the involved employees are within the supervisor's line of supervision.
- Notifying the Personnel Department or any other member of management immediately of any reported or suspected violations of this policy.

Discrimination or Harassment Advanced by Non-Employees

The rules against unlawful discrimination and harassment set forth in this Policy also apply to non-employees with whom our employees come into contact in connection with their employment with us (for example, the Company's customers, consultants and vendors). Consequently, if you feel discriminated against or harassed (sexually or otherwise) by a non-employee in connection with your employment, you should use the procedure set forth below. Similarly, the rules against unlawful discrimination and harassment set forth in this Policy apply not only to your actions relative to employees and members of our Company but also to non-employees with whom you do business, including temporary employees, customers, suppliers, vendors, etc.

Social Relationships

Sometimes social relationships may develop at work. While you have the right to say yes, you also have an absolute right to say no. Consequently, if you feel any unwelcome pressure to become involved with any manager, supervisor, co-worker, agent or non-employee, we urge you to use the complaint procedure discussed below.

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What to do if you feel you have been subjected to unlawful discrimination or harassment

If you believe that you may have been discriminated against or harassed in violation of our EEO policy by any person (manager, supervisor, co-worker, agent, customer, etc.), you should report your concerns immediately to your supervisor, another member of company management or any member of the Personnel Department. Please speak with the member of the Personnel Department with whom you feel the most comfortable. You may also speak with any officer of the company with whom you feel most comfortable.

Similarly, if you have any questions as to whether certain conduct is unlawful discrimination or harassment, you are encouraged to speak with any member of the Personnel Dept. This is particularly true when it comes to sexual harassment, where what is offensive to one person may not be offensive to another. Consequently, it is important that you let your feelings be known.

All complaints will be investigated promptly, and the existence and nature of your complaint will be disclosed only to the extent necessary to make a prompt and thorough investigation or as may be necessary to take appropriate corrective measures. Further, management will ensure that there is no coercion, retaliation, intimidation, or harassment directed against any person who registers a complaint or serves as a witness on behalf of another person. An appropriate report will be made to the employee making the complaint regarding the result of the investigation. If the employee does not agree with the results of the investigation, he or she may seek further review from the Vice President of Personnel.

Violations of our Company's Equal Employment Opportunity Policy

Any person who, after appropriate investigation, has been found to have discriminated unlawfully against or harassed unlawfully another person will be subject to appropriate corrective action, up to and including termination of his or her employment or other relationship with our Company.

Failure to take action to stop known harassment or report known harassment shall be grounds for discipline, up to and including termination of employment or other relationship with our Company.

Further, any person who, after appropriate investigation, has been found to have coerced, retaliated against, intimidated, or harassed another person for registering a complaint or for serving as a witness will be subject to appropriate corrective action, up to and including termination of his or her employment or other relationship with our Company.

New York State Employees

Sexual harassment is prohibited on the basis of self-identified or perceived sex, or gender expression.

Employees in New York State may file claims of sexual harassment with the federal Equal Employment Opportunity Commission and New York State Human Relations Commission. Employees in New York State may also have the right to file such claims in federal or New York State court.

Title VII of the Civil Rights Act of 1964, New York State statutory provisions and local laws related to sexual harassment provide remedies to employees who have been subject to sexual harassment. Such remedies include back pay, front pay, emotional distress damages, and injunctive relief.

A complaint form to report an incident of sexual harassment is available from management or the Personnel Department.

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Record of Revisions

Revision #	Revision Date	Description
1	11-10-11	Change Number 1480 updated header and footer information
2	10-2-19	Change Number 4975 New York State added to EEOC Policy
3	6-24-20	Change Number 5275 added sexual orientation and gender identity

Uncontrolled Document