

<b><i>EAST PENN MANUFACTURING CO., INC.</i></b>			
<b>EAST PENN POLICIES AND PROCEDURES MANUAL</b>			
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Approved By: Robert D. Harrop		Document No.: EPPM\PERSONAL\NAVITAS	

## **Company Property and Electronic Communication**

It is the Company's policy that company-owned or -leased property shall remain on Company premises at all times. Exceptions to this policy will be made only with prior management approval. However, from time to time and for various reasons, you may find it necessary to leave the building with such property in your possession. Reasons could range from travel on Company business to simply taking work home. A list of such property would include, but is not limited to, cellular phones, notebook computers, Company files and/or records, etc. All Employees will be issued key cards during their employment in order to access various parts of the building. These key cards remain Company property.

Employees must contact the HR Department as soon as possible to notify them of any lost or stolen Company property. Employees will be responsible for the replacement of lost, stolen, or damaged Company property unless significant extenuating circumstances exist that are beyond the Employee's control. Unauthorized or abusive use of such property is prohibited. All Company property such as keys, equipment, publications, printouts, catalogs, business cards, contracts, records, files, cellular phones, notebook computers, flash drives and other items must be returned to the Company by the last day of employment or sooner, if requested.

Employees are expected at all times to exercise prudence and good judgment when in possession of Company property. In this regard, such property is always to remain in the immediate control of the Employee and should be safeguarded, as would be the case with any valuable, personal property. Company documents and records are considered highly confidential and should be handled in such a way as to ensure such confidentiality while away from Company offices. Management may ask an Employee leaving the premises with such materials to sign a document noting the records taken and the reason for their removal. Violation of this provision may result in disciplinary action up to and including discharge.

### **Electronic Communication**

The Company has established the following policy that governs the use of electronic communication systems (collectively, "Electronic Communication") at the workplace, including the telephone communication systems. The Company reserves the right to amend these policies. An Employee's fax, voicemail, text and computer/internet use of the Company's communication systems constitutes the Employee's agreement to abide by the Company's policies governing the Company communication systems as set forth below, or as modified in the future.

#### **Business use**

All electronic communication systems are to be used for business purposes, meaning that use of such equipment and systems must be job-related. The Company reserves the right to restrict access at any time to certain sites that it deems not necessary for business purposes.

#### **Business form**

Electronic communications reflect the Company image. Email is any message created or received on an electronic mail system, including text or word processing documents, spreadsheets or other data

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compilations transmitted through a computer or computer system. Email stored on or sent or recovered utilizing company property is considered property of the company including email transmitted from or to a non-company computer. The same is true for texts sent to or from company phones. They should be composed in a professional manner that is similar to messages sent on Company letterhead. Employees should keep in mind that electronic files are subject to discovery and may subsequently be used in litigation involving the Company or the Employee. Therefore, it is expected that Employee statements in electronic messages and texts will reflect favorably on the Company and on the Employee.

#### File management

In order to keep the electronic communication systems and computer systems running efficiently, Employees should delete unnecessary electronic messages and texts stored in the system, as well as computer files that are no longer needed.

#### Company property

In addition to the system hardware and software, all electronic files, electronic messages, texts and voice messages are the property of the Company, whether composed, received or sent by the Employee. These communications and files constitute business records belonging to the Company.

#### Privacy and passwords

Because all electronic communications are the property of the Company, Employees should not expect that such communications are private. The Company reserves the right to retrieve, monitor, or review any electronic message in the Company email and Electronic Communication system, and may disclose such messages for any purpose without notice to the Employee and without seeking permission of the Employee. Passwords must be disclosed to the appropriate Company officer upon request. In addition, Employees should be aware that deleted files may be retrieved and read by the Company.

#### Solicitation prohibited

Employees may not use email or voice mail systems to solicit for charitable or commercial ventures, or in any way that violates the Company's Conflict of Interest and Ethics policy. Employees may not use the systems to further religious, political or other causes.

#### Proprietary information restrictions

Receiving or downloading, or sending or uploading of proprietary information is prohibited without prior authorization. Such information includes copyrighted materials, trade secrets, proprietary financial information, or similar materials.

#### Copyright restrictions

The Company shall at all times possess sufficient licensing, registration, and authorization for the use of all software installed on any company-owned computer, whether networked or stand-alone. Employees will observe and comply with software copyrights applicable to all software and/or hardware owned and used by the Company. Employees shall not violate copyrights by any means including, but not limited to, using or maintaining more copies of any software than the copy allows or for which insufficient licensing is held, obtaining and using software for which the Company does

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not possess a valid license, and the loaning or giving of Company software to any party or parties not in possession of required licensing and registration.

Software should not be downloaded from the Internet as the download could introduce a computer virus onto the Company's network. In addition, copyright laws may cover the software so the downloading could be an infringement of copyright law.

#### Encryption prohibited

Employees are prohibited from encrypting files on their computers or taking any steps that block access to files, other than the use of the Company passwords or approved encryption programs.

#### Anti-harassment policies applicable

Company policies prohibiting sexual or other harassment are applicable to email, voice mail systems, and the Internet. Messages that contain foul, inappropriate, or offensive language, or those containing racial or ethnic slurs, or sexual innuendos, are strictly prohibited.

#### Confidentiality

Network security and administration shall be performed solely by Employees holding network supervisory clearance. All Employees requiring network access shall have a unique login name and password that is not easily guessed by others. Employees shall not divulge nor share their personal passwords with other Employees or persons accessing the network.

All computer files containing confidential information must be password-protected. Employees are expected to respect the confidentiality of messages sent to others. Employees may not access or review email or voice-mail messages that are not distributed to them, other than during an absence situations where a manager may need to access ones voicemail or email when warranted.

#### Internet postings

Employees must receive permission from their supervisor before posting messages to electronic bulletin boards, list-serves or similar public posting forums on the Internet. When posted, such messages must contain a disclaimer at the end of the message that: "The opinions expressed in this message are mine only, and do not reflect the opinion or position of my employer."

#### Notice of violations

Employees who observe violations of these electronic communication policies shall notify their immediate supervisor or shall report the violation to Human Resources.

#### Discipline

Employees who violate this policy are subject to discipline, up to and including termination of employment.

#### Policy Changes

The Company reserves the right to monitor, review, inspect and access all Employee electronic communication activities to determine that the usage is related to the Company's purposes and complies with all policies, practices, and procedures, including policies prohibiting harassment and discrimination. The Company does not tolerate the transmission of discriminatory, offensive or

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unprofessional messages or accessing any internet sites that are discriminatory, offensive or explicit in nature, including but not limited to pornography sites. Employees and users of the Company's computers and internet system are encouraged to notify the Company should they need to access questionable sites for business purposes.

By signing the Receipt of Employee Handbook page, the Employee acknowledges that he/she has read this Company electronic communication policy and agrees to abide by its terms.

### **Mobile Phone Use**

Employees should be aware that the Company does not promote the use of mobile phones while operating a vehicle. Safety must come before all concerns; under no circumstances should Employees place themselves or others at risk to fulfill business needs.

Employees whose job responsibilities include driving, and who may use a mobile phone for business purposes, are expected to refrain from using their mobile phone, texts and email while driving. Employees should plan calls to allow placement either prior to driving or while on rest breaks. Employees are expected to pull off to the side of the road and safely stop their vehicle before accepting calls. If acceptance of a call while driving is unavoidable, and pulling over is not an option, Employees are expected to keep the call short and use a hands-free device, so that their eyes remain focused on the road, and both hands remain on the steering wheel, at all times.

Employees will be solely responsible for any traffic violations resulting from the use of a phone or email while driving.

Employees also should be aware that conversations over mobile phones are not necessarily confidential; it is possible that outside parties could tap into those conversations. If you need to communicate about a highly confidential matter, please try to use a more secure method of communication.

Manufacturing Employees shall not use their mobile phones (for calls, texts or emails) while in the production areas. Use of mobile phones shall be allowed during normal breaks and lunches.

Violations of this policy will be subject to discipline, up to and including termination.

### **Social Media Policy**

While the Company recognizes that it is generally your right to do what you want on your own time, employee use of social media (e.g. Facebook, Twitter, employee blogs, etc.) both inside and outside the workplace continues to concern it, because of the impact it can have on co-workers, the workplace, and customers. Consequently, the Company has adopted the following Social Media Policy, effective immediately.

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1. use of social media during your normal work schedule is prohibited, except when you are on break or absent from work;
2. employees may not, during the course of using social media (whether at work or at home) directly or indirectly disclose the following confidential information concerning the Company, its employees or customers:
  - (a) non-public information about Company: products in development; design details regarding Company products; pricing formulae and policies; contract terms with vendors and customers; manufacturing technology and processes; business plans and strategies; publicity and advertising strategies; internal financial information; or vendor and customer lists;
  - (b) information sought, given or discovered during the course of a confidential investigation under the Company's Anti-Harassment policy;
  - (c) any findings made or non-public disciplinary action taken pursuant to the Company's Anti-Harassment policy;
  - (d) personal identifying information about another Company employee (i.e. social security number, date of birth, non-public addresses and telephone numbers);
  - (e) information about another Company employee's health condition; or
  - (f) any non-public information contained in another employee's personnel file or records.
3. Employees may not make any comment or statement concerning co-employees that is threatening, intimidating or would violate the Company's Anti-Harassment policy, which prohibits discrimination, harassment or hostility on account of race, age, national origin, religion, sexual orientation, disability, or other protected class, status or characteristic.
4. Employees may not represent in any way that they are speaking on behalf of the Company without prior written authorization.
5. This policy does not otherwise prohibit employees from using social media to discuss work-related issues, terms or conditions of employment or the work environment, or to induce, initiate or prepare for group or concerted activity as permitted by Section 7 of the National Labor Relations Act.

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**Record of Revisions**

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