

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 7	Effective Date: 11-1-02	Page 1 of 6	Change # 3722
Approved By: Robert D. Harrop		Document No.: EPPM\PERSON\SEC1\3A.DOC	

East Penn Manufacturing Inc. Company Code of Conduct

Statement of Policy:

Rules and regulations are essential to the efficient, orderly and safe operation of the Company. They are also intended to inform employees about the standards of behavior expected in the workplace. The following Code of Conduct is established for the guidance and protection of all employees at East Penn Manufacturing Co., Inc. and to create a positive workplace in which all employees treat each other with respect. The rules are fundamental in character and designed to give us a more efficient and successful operation.

It is the policy of East Penn to be patient, sympathetic, fair and tolerant in the administration of the Company Code of Conduct. It is the sincere desire of management to assist the members of our Company in every way possible so that all of us may go forward together successfully into the future. Willful, inexcusable violations of these rules will be dealt with firmly under a uniform policy that applies equally to all employees and departments. The Company remains strongly committed to fully complying with all federal, state, and local laws regarding discrimination and employment. Accordingly, absences excusable under statutes such as the Family and Medical Leave Act or the Americans with Disabilities Act will not cause an employee to be subject to disciplinary action.

Confidentiality:

Confidential information, knowledge, or data obtained as a result of employment with East Penn Manufacturing Company, Inc. may not be divulged to persons outside the Company, unless authorized by the Company in writing. Examples of this type of information include but are not limited to the company phone directory or employee lists not otherwise available to the public, Company's trade secrets, private or secret processes, and information of the Company concerning its business, customers, vendors, products and services, and their respective development, procurement, sales activities and procedures, promotion and pricing techniques, and credit and financial data concerning customers and vendors, customer lists, production processes, or any other type of similar information that, if disclosed, could be detrimental to the Company, or its employees, customers or others with whom the Company does business.

Environmental Health and Safety (EHS) Performance Standards

East Penn Manufacturing Company, Inc. is committed to providing a safe and healthful environment for all employees and the surrounding community. As a condition of employment, each employee is responsible for performing his or her job safely and for minimizing the risk of injury to themselves and fellow employees, contractors, and visitors. All employees are expected to subscribe to proper environmental, safety, and health practices. East Penn expects all employees to report any safety-related incidents or exposures immediately to their supervisor or a health and safety professional. Prompt, voluntary notification of such incidents or exposures will be given positive consideration in the investigation of any environmental, health and safety violation.

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 7	Effective Date: 11-1-02	Page 2 of 6	Change # 3722
Approved By: Robert D. Harrop		Document No.: EPPM(PERS)\SEC1\3A.DOC	

East Penn has identified guidelines on expected environmental, health, and safety (EHS) performance. These guidelines include, but are not limited to the safety practices outlined below.

Required Safety Practices

- Use of proper hygiene practices where required in lead-exposed areas
 - Shower at end of shift
 - No dry sweeping
 - Clean shaven at point of respirator contact
 - Handle company provided uniforms in proper manner and do not remove from company premises
- Hygiene practice before breaks and lunch (e.g., vacuuming, washing hands)
- Maintain ventilation system
- Keep work area clean and organized
- Consume food, drinks, and tobacco products and apply cosmetics in authorized areas only
- Use personal protective equipment (PPE) properly and as assigned
- Safety glasses and steel-toed shoes are minimum PPE for all plant assignments
- Use proper work permits and procedures for a) hotwork b) lockout/tagout and c) confined space entry
- Always promptly report unsafe conditions and acts to your supervisor, including near misses
- Use equipment properly and as designed
- Do not use defective equipment
- Use ladders or approved platforms only for elevated work and follow proper fall protection procedures and practices
- Secure oxygen, acetylene and other cylinders in upright position
- All guards must be in place before operating equipment
- Proper handling and disposal of wastes and recyclable material is required
- Proper use and storage of chemicals is required
- Head protection is required at the Smelter, construction sites, whenever overhead work is performed and when operating material handling equipment except for hand jacks and walkie riders
- Accurately complete information on accident reports, accident investigations, insurance forms, and/or other environmental, health or safety documents.
- Attend all company-scheduled medical exams and appointments
- Long or loose hair, jewelry, and clothing pose the potential of becoming entangled in machinery or moving equipment. To reduce the chance of injury, loose hair, loose jewelry, and loose clothing can not be permitted in production areas.

Policy Guidelines:

The Code of Conduct has been divided into three (3) groups, namely Group I, Group II and Group III. Violations of rules in Group I and II will result in progressive discipline. The steps of progressive discipline may not be followed in the event that multiple violations occur within a short period of time or if the employee is absent from work. A single violation of a rule in Groups I or II will generally not be used for purposes of progressive discipline if there is no further violation of that rule or another rule within twelve (12) months from the date of the first infraction; exceptions to this include but are not limited to a second occurrence of working under the influence of alcohol or illegal drugs or repeated patterns of unwelcome behavior.

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 7	Effective Date: 11-1-02	Page 3 of 6	Change # 3722
Approved By: Robert D. Harrop		Document No.: EPPM(PERS)\SEC1\3A.DOC	

Employees who are within their Introductory Period can be terminated with any single infraction of the Code of Conduct.

Any of the following combination of violations within a twelve-month period is considered just cause for termination of employment:

- Three (3) violations of a rule or rules in Group I; or
- Two (2) violations of a rule or rules in Group II; or
- One (1) violation of a rule in Group III; or
- Two (2) violations of a rule or rules in Group I followed by one (1) violation of a rule in Group II; or
- One (1) violation of a rule or rules in Group II, followed by two (2) violations of a rule or rules in Group I; or
- One (1) violation of a rule or rules in Group I, followed by one (1) violation of a rule or rules in Group II, followed by one (1) violation of a rule in Group I

The Company will make every effort to thoroughly investigate all disciplinary situations in a reasonable amount of time. However; the Company will administer any and all violations that are applicable in any disciplinary situation regardless of when Management was made aware of the situation or when the situation occurred. The rules outlined below are not intended to cover every example of unacceptable conduct and employees will be subject to discipline for other improper or offensive conduct including any violations of the Company's Policies and Procedures. Similarly, a verbal warning or counseling may be used depending on the nature and severity of the conduct. Supervisors and other members of Management may be held to a higher standard of rules dependent on the situation.

GROUP I

Disciplinary Action for Group I Rules:

1st Offense: Written Reprimand.

2nd Offense: Written Reprimand and three (3) days suspension without pay.

3rd Offense: Termination of Employment

***Indicates a documented verbal warning should be given prior to a Group 1 as a first offense. (Documented warning is active for 1 year)**

1. *Abusing break periods or not properly working during working hours, including leaving own department without permission from the supervisor.
2. *Eating, drinking, smoking, having food products, chewing gum, or tobacco products except at designated times and in designated areas.
3. *Failure to meet company work standards in terms of hygiene and safety, quality, or quantity.
4. Unexcused late arrival or leave early to/from work between 1 and 59 minutes. (4 times in a 6-month period).
- ± 5. Habitual failure to scan your ID card (6 times in a 6 month period), abuse of the scanning system or failure to give 48 hours advance notice for vacation days (5 in a 6 month period).

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 7	Effective Date: 11-1-02	Page 4 of 6	Change # 3722
Approved By: Robert D. Harrop		Document No.: EPPM\PERSON\SEC1\3A.DOC	

6. Unintentional damage, neglect, mishandling, misuse of a machine, equipment, product, or other company products/materials.
7. Failure to properly notify Company of absence for one day. (See Guidelines for Proper Notification.)
8. *Failure to keep appointment made by the Company for professional services, including physician appointment without prior cancellation and/or notification.
9. Use or display of obscene, abusive, inappropriate or harassing language, graphics, videos or gestures towards co-workers, customers, vendors or visitors; spreading maliciously false rumors; interfering with the job performance of co-workers, supervisors and managers, customers, vendors or visitors; failure to work in a cooperative manner with co-workers, supervisors and management, customers, vendors and visitors.
10. Reckless or inappropriate behavior in the workplace which results in or poses a general risk of personal injury and/or property damage and/or environmental incident.
11. Removing protective guards from machinery except for cleaning or maintenance purposes and/or neglecting to return protective guards in place before operating the machinery.
12. *Neglecting to take a shower at the end of shift as required or failure to follow proper hygiene practices as required in lead-exposed areas or under Medical Removal Protection (MRP).
13. *Failure to wear personal protective equipment (PPE) such as required by OSHA standards, Health and Safety Department or job requirements.
14. *Having facial hair that will restrict the proper seal of a respirator.
15. *Failure to tie back and secure hair or failure to tuck in loose clothing/jewelry when working around moving operating equipment or machinery.
16. *Welding without an appropriate permit or not following proper welding safety procedures.
17. Blocking access to exits and/or emergency equipment.
18. Failure to properly lockout or tagout equipment or machinery and/or impeding production by failing to promptly remove a lock and/or tag when work is completed.
19. Working in a confined space without a proper permit.
20. Using equipment for purposes other than those for which it is designed.
21. Failure to follow fall protection procedures and practices as required by OSHA standards.
22. *Improper storage of oxygen, acetylene or other cylinders, or failure to store cylinders in an upright, secured position.
23. *Failure to properly use or store chemicals.
24. *Failure to properly handle or dispose of hazardous materials, solid/liquid wastes or recyclable materials.
25. Reckless or careless driving of company equipment or a company vehicle or reckless driving of personal vehicle on company property. (See Fitness for Duty Policy)
26. Unauthorized use of personal cell phones during working hours or at anytime in a work area, including but not limited to texting, talking. "Working hours" does not include scheduled break and meal times. Taking photos or videos is prohibited at all times on company property without Management authorization including, but not limited to the use of cell phones or cameras.
27. Failure to report to the Company Medical Department any prescribed medications for personal use that may interfere with Fitness for Duty.
28. Unauthorized access to electrical panel or failure to comply with proper code.
29. Unauthorized removal of company uniforms from company property.

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 7	Effective Date: 11-1-02	Page 5 of 6	Change # 3722
Approved By: Robert D. Harrop		Document No.: EPPM\PERs\SEC1\3A.DOC	

GROUP II

Disciplinary Action for Group II Rules:

1st Offense: Written Reprimand and immediate suspension for three (3) days without pay.

2nd Offense: Termination of Employment.

30. Being insubordinate or disrespectful to, or threatening, intimidating, assaulting or coercing any person on Company premises or on Company time, or at a Company sponsored function regardless of location for any purpose.
31. Sleeping during working hours.
32. Failure to properly notify Company of absence for 2 consecutive days. (See Guidelines for Proper Notification)
33. Reckless or inappropriate behavior in the workplace which results in or poses a serious risk of personal injury and/or property damage and/or environmental incident.
34. Major deficiency or deficiencies in work performance that result in or have the potential to result in significant product or productivity loss.
35. Failure to report an accident/incident, spill/release or other environmental incident.
36. Damage, destruction, tampering with or neglect of PPE, or environmental, health and safety controls.
37. Bypassing or neutralizing machine guards or reaching into operating, moving machinery or equipment.
38. Reporting to work under the influence of alcohol, illegal drugs, unauthorized use of prescription medication and/or controlled substances. (See Fitness for Duty Policy)

GROUP III

Disciplinary Action for Group III Rules:

1st Offense: Termination of employment

39. Unauthorized disclosure of confidential information or records.
40. Insubordinate conduct
41. Falsifying records requested by the Company, deception, fraud, lying during an investigation or cheating.
42. Unauthorized use of company equipment, supplies, or facilities for non-job related activities.
43. Personal possession of and/or consuming alcoholic beverages, illegal drugs, or controlled substances without a valid prescription on Company property.
44. Immoral or offensive conduct or indecency on Company property and/or on Company time or at a company sponsored function regardless of location, including a significant single occurrence of harassment or a repeated pattern of harassing behavior. (See Harassment Policy)
45. Personal possession of firearms or weapons on Company property.
46. Fighting or threatening to harm any person at any time on Company property or at company sponsored events regardless of location, or using any form of communication device to make threats against employees, customers, or the company at any time.
47. Willfully restricting or improperly causing others to restrict production or delivery of goods.

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 7	Effective Date: 11-1-02	Page 6 of 6	Change #3722
Approved By: Robert D. Harrop		Document No.: EPPM\PERSON\SEC1\3A.DOC	

48. Interfering or improperly causing others to interfere with or destroy electronic and computer records and systems. (Refer to Computer Use and Acquisition Policy)
49. Leaving the plant during working hours without proper notification to the department supervisor or other member of Management.
50. Failure to properly notify Company of absence for 3 consecutive days. (See Guidelines for Proper Notification)
51. Deliberate destruction, or the intent to deliberately destroy Company property or property of fellow employees in any manner, or willful neglect which results in the damage of or intent to damage, Company property or property of fellow employees in any manner.
52. Deliberately or willfully engaging in reckless or inappropriate behavior in the workplace which results in or poses a serious risk of personal injury and/or property damage or environmental incident.
53. Cutting or removing a lock that is in place for lockout/tagout purposes without following the proper procedure.
54. Three separate occurrences of 5 unexcused absence warnings within one rolling calendar year.
55. Theft of Company or other employees' property or committing/conspiring to do any illegal activities at work.

Record of Revisions

Revision #	Revision Date	Description
3	11-10-11	Change Number 1480 updated header and footer information
4	1-18-13	Update Code of Conduct violations Change#1782
5	4-8-14	Add GI,GII,GI Termination Combination Change#2035
6	11-1-15	Revised wording to provide clarification Change#2567
7	10-23-17	Update Group I #5 violation Change #3722