

<b><i>EAST PENN manufacturing co., inc.</i></b>			
<b>EAST PENN POLICIES AND PROCEDURES MANUAL</b>			
Revision No.: 3	Effective Date: 4/4/2016	Page 1 of 1	Change # 4819
Approved By: Robert D. Harrop		Document No.: EPPM\PERS\SEC1\ 34A.DOC	

## Open Door/Ethics Policy

This policy outlines a procedure for employees to report actions that an employee reasonably believes violate a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to East Penn Mfg's business and does not relate to private acts of an individual not connected to the business of East Penn Mfg.

± If an employee has a reasonable belief that an employee or East Penn has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information to the Assistant Vice President of Personnel or Vice President of Personnel. If the employee does not feel comfortable reporting the information to the Assistant Vice President of Personnel or Vice President of Personnel, he or she is expected to report the information to any Sr. Vice President, Divisional Vice President, Executive Management or Manager/Supervisor that they feel comfortable talking with. Employees may also call the East Penn Helpline at 610-641-2049 and press #4 to leave an anonymous complaint, which will be thoroughly investigated and taken seriously by the company.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, East Penn Mfg will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.

East Penn Mfg will not retaliate against an employee in the terms and conditions of employment because that employee: (a) reports to a supervisor, to any member of Senior Management or to a federal, state or local agency what the employee believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

East Penn Mfg may take disciplinary action (up to and including termination) against an employee who in management's assessment has engaged in retaliatory conduct in violation of this policy.

Supervisors will be trained on this policy and East Penn Mfg's prohibition against retaliation in accordance with this policy.

<b>Revision #</b>	<b>Revision Date</b>	<b>Description</b>
1	4/4/2016	Document #3034 New Policy
2	3/21/2018	Change #3883 Updated 2 <sup>nd</sup> paragraph, renamed policy
3	6/26/2019	Change #4819 Correction to Assistant Vice President of Personnel