

<i>EAST PENN MANUFACTURING CO., INC.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.:	Effective Date: 10/1/2021	Page 1 of 3	Change #
Approved By: Robert D. Harrop		Document No.: EPPM\PER\NAVITAS	

Workplace Violence

The Company is concerned about the increased violence in society, which has also filtered into many workplaces throughout the United States. Therefore, the Company has taken steps to help prevent incidents of violence from occurring at the Company. For this reason, it is the policy of the Company to expressly prohibit any acts or threats of violence by a Company Employee or former Employee against any other Employee in or about the Company's facilities or elsewhere at any time.

The Company also will not condone any acts or threats of violence against the Company's Employees, customers, or visitors on the Company's premises at any time or while they are engaged in business with or on behalf of the Company, on or off the Company's premises.

In keeping with the spirit and intent of this policy, and to ensure that the Company's objectives in this regard are attained, it is the commitment of the Company:

- To provide a safe and healthful work environment, in accordance with the Company's safety and health policy.
- To take prompt remedial action up to and including immediate termination, against any Employee who engages in any threatening or intimidating behavior or acts of violence or who uses any obscene, abusive, or threatening gestures or language, including email, graffiti, etc.

To take appropriate action when dealing with customers, former Employees, or visitors to the Company's facilities who engage in such behavior. Such action may include notifying the police or other law enforcement personnel and prosecuting violators of this policy to the maximum extent of the law.

- To prohibit Employees, former Employees, customers, and visitors from bringing unauthorized firearms or other weapons onto the Company's premises.
- To establish viable security measures to ensure that the Company's facilities are safe and secure to the maximum extent possible and to properly handle access to company facilities by the public, off-duty Employees, and former Employees.

Any Employee who displays a tendency to engage in violent, abusive, or threatening behavior, or who otherwise engages in behavior that the Company, in its sole discretion, deems offensive, threatening, dangerous, or inappropriate will be subject to disciplinary action, up to and including discharge.

Duty to Warn

In furtherance of this policy, Employees have a "duty to warn" their supervisors, security personnel, or Personnel representatives of any suspicious workplace activity or situations or incidents that they observe or that they are aware of that involve other Employees, former Employees, customers, or visitors and that appear problematic. This includes, for example, threats or acts of violence, aggressive behavior, offensive acts, threatening or offensive comments or remarks, and the like. Employee reports made pursuant to this policy will be held in confidence to the extent possible. The Company will not condone or tolerate any form of retaliation against any Employee for making a report under this policy.

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Workplace Bullying

The Company defines bullying as “repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Such behavior violates the Company’s Code of Ethics which clearly states that all employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives that the Company will not in any instance tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual which is important. The Company considers the following types of behavior examples of bullying:

- **Verbal Bullying:** slandering, ridiculing or maligning a person or his/her family; persistent name calling which is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.
- **Physical Bullying:** pushing; shoving; kicking; poking; tripping; assault, or threat of physical assault; damage to a person’s work area or property
- **Gesture Bullying:** non-verbal threatening gestures, glances which can convey threatening messages
- **Exclusion:** socially or physically excluding or disregarding a person in work-related activities

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person
- Shouting, raising voice at an individual in public and/or in private
- Using verbal or obscene gestures
- Not allowing the person to speak or express him/herself (i.e., ignoring or interrupting).
- Personal insults and use of offensive nicknames
- Public humiliation in any form
- Constant criticism on matters unrelated or minimally related to the person’s job performance or description
- Ignoring/interrupting an individual at meetings
- Public reprimands
- Repeatedly accusing someone of errors which cannot be documented
- Deliberately interfering with mail and other communications
- Spreading rumors and gossip regarding individuals
- Encouraging others to disregard a supervisor’s instructions

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- Manipulating the ability of someone to do their work (withholding information, setting meaningless tasks, setting deadlines that cannot be met, giving deliberately ambiguous instructions)
- Inflicting menial tasks not in keeping with the normal responsibilities of the job
- Taking credit for another person's ideas
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave
- Deliberately excluding an individual or isolating them from work-related activities (meetings, etc)

Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property).

Record of Revisions

Revision #	Revision Date	Description