

INNOVATING WITH INTEGRITY

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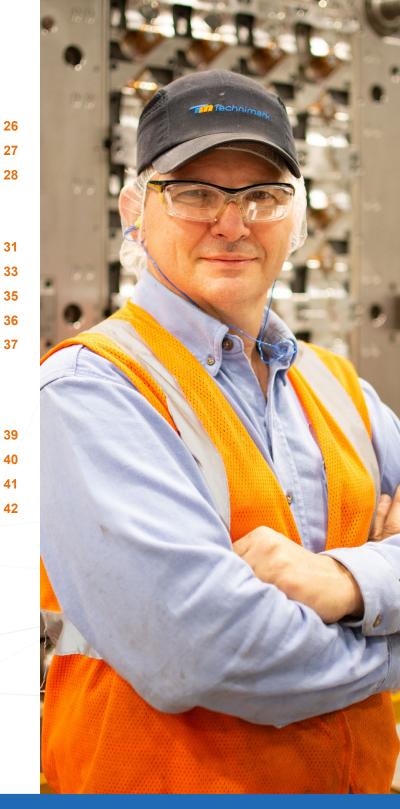
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A MESSAGE FROM OUR PRESIDENT AND CEO

At Technimark, we're delivering consistency, technology, and innovation to a rapidly changing world. No matter where our customers operate or what challenges they face, we act as their partners, working each day to serve them with excellence, integrity, and a commitment to the highest ethical standards.

With our help, our customers' products are becoming stronger, safer, and reaching the people who need them faster than ever before. When you consider the trust that our customers place in Technimark, you understand the responsibility we have to give them our best – to keep our promises and make sure that we are always **Innovating With Integrity**.

As a member of the Technimark team, we trust you to help us succeed. Our Code of Conduct can help you along the way. It explains what matters most to us as a Company and what is expected of you as an employee. The Code can guide you in your day-to-day decision-making and give you confidence that you're helping us uphold our values, our policies, and the many laws that apply to our work.

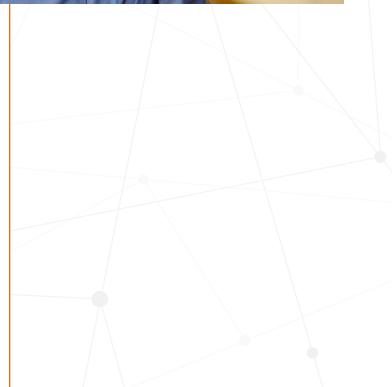
Read the Code carefully and refer to it often to help you navigate common ethical situations. If any of these situations get complicated or you are concerned about a violation of our Code and our commitment to do the right thing, speak up and ask for help. After all, it's the issues we don't uncover that can hurt our Company and everyone we serve.

Thank you for continuing to put your very best into everything we do at Technimark. Together, we'll build lasting relationships and lasting success for our Company.

Bral D. Welligt

Brad Wellington President and CEO





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INNOVATING WITH INTEGRITY

OUR INSPIRATION





OUR VISION

To be the most trusted manufacturing solutions partner to the world's leading companies.



OUR MISSION

To design and manufacture innovative products that enhance and improve life.



OUR FOUNDATION

To adhere to the principles of honesty, integrity, quality, dependability, and safety for our stakeholders, and always let our actions speak louder than our words.



OUR VALUES

Excellence. We always find ways to do the right thing, better.

Respect. We respect and value the diversity and differences in each other.

Service. We're not happy until our customers are happy.

Positivity. We are strongest when we work together with a "can-do" attitude.

OUR CODE

PURPOSE AND OVERVIEW WHO MUST FOLLOW OUR CODE OUR RESPONSIBILITIES MAKING GOOD CHOICES SHARING CONCERNS OUR COMMITMENT TO NON-RETALIATION



INNOVATING WITH INTEGRITY

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PURPOSE AND OVERVIEW

Technimark's business may run on technology and innovation, but at our core, we are people-powered. We succeed because of our team – the way we work, win business, and interact with others. In each of these aspects and so much more, we hold ourselves to the highest ethical standards and give Technimark and our customers our very best.

The work we do matters a great deal to everyone we serve, so we always work in a way that reflects our values and beliefs. But our work can also get complicated. Many laws and regulations apply to us, and it can be challenging, if not impossible, to always know the right thing to do.

Our Code of Conduct ("Code") is the best place to start when you have questions. It's a vital resource designed with you in mind. The Code will help you:

- Comply with all applicable laws, rules, regulations, and Company policies.
- > Promote integrity and the highest standards of ethical conduct.
- > Address common ethical situations you could encounter in your work.
- > Avoid even the appearance of anything improper in connection with our Company's business activities.

We operate in multiple countries, so it's important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners, and coworkers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from your site Human Resources Manager.

Other Company Policies and Procedures

Although our Code is a valuable tool, it may not answer every question you have or address every situation you face. Throughout the Code, we have referenced corporate policies that may provide greater detail to help you in making the right decisions. As always, we rely on you to use good judgment and seek help when you need it.

Future updates to this Code may occur to reflect changes in laws, business, and regulatory developments. Be aware that we may update our policies and amend our Code at any time, so refer to the Code often to make sure you're up to date on what is required.

Accountability and Discipline

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. If you see or suspect a violation, report it.

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with Technimark. You should also understand that violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.



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WHO MUST FOLLOW OUR CODE

All employees of Technimark and its affiliated companies, including all executives and corporate officers, in addition to members of our Board of Directors, are required to read, understand, and follow our Code.

Consultants, contractors, agents, suppliers, and temporary employees ("business partners") who serve as an extension of Technimark are also expected to follow the spirit of our Code, as well as any applicable contractual provisions. For more information, please refer to our <u>Supplier Social</u> <u>Responsibility Policy</u>.

If you supervise our business partners, you are responsible for communicating our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their contract.



OUR RESPONSIBILITIES

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what enables us to succeed and grow.

Employee Responsibilities

Each member of our team has the responsibility to:

- > Act in a professional, honest, and ethical manner when conducting business on behalf of our Company.
- > Know the information in our Code and Company policies and pay particular attention to the topics that apply to your specific job responsibilities.
- > Complete all required employee training in a timely manner and keep up to date on current standards and expectations.
- > Report concerns about possible violations of our Code, our policies, or the law to your supervisor or manager, an executive, or any of the resources listed in this Code.
- > Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.



Additional Responsibilities for Supervisors and Managers

Technimark supervisors and managers have an even greater responsibility to uphold our Code and Company values. They have the responsibility to:

- > Lead by example. As a supervisor or manager, you are expected to exemplify high standards of ethical business conduct.
- > Help create a work environment that values mutual respect and open communication.
- > Be a resource for others. Communicate often with employees and business partners about how the Code and other policies apply to their daily work.
- > Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- > Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.
- > Respond quickly and effectively. When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- > Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what isn't), discuss the matter with senior management.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law.

WHAT IF?

I'm a supervisor and not clear on what my obligations are if someone comes to me with an accusation – and what if it involves a senior manager? No matter who the allegation involves, you must report it. Technimark provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code.



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MAKING GOOD CHOICES

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you're not alone. There are resources available to help you.

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Facing a Difficult Decision?

It may help to ask yourself:

Is it legal?

Is it consistent with our Code and our values? Would I feel comfortable if senior management and others within my Company knew about it?

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Would I feel comfortable if my decision or my actions were made public?

If the answer to all these questions is **"yes,"** the decision to move forward is probably OK, but if the answer to any question is **"no"** or **"I'm not sure,"** stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

One More Thing ...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical Technimark is a responsibility we all share.

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SHARING CONCERNS

If you see or suspect any violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your supervisor.

If you're uncomfortable speaking with your supervisor, or if you have already shared a concern and feel it hasn't been appropriately addressed, there are other resources available to help you. Contact either:

- > Another, more senior member of management.
- > Your site Human Resources Manager.
- > Any of the additional resources found in this Code.
- > The independent and confidential Lighthouse Hotline:
- > Online: lighthouse-services.com/technimark
- > Phone:

Country	Phone Number
USA and Canada (English-speaking)	800-401-8004
USA and Canada (Spanish-speaking)	800-216-1288
Canada (French-speaking)	855-725-0002
Mexico	01-800-681-5340
China	400-120-9050
Germany	0800-183-0724
Ireland	1-800-948-326
UK	0-808-189-0041
All other countries	Click here for dialing instructions. 1. Dial toll-free country access code 2. Dial 800-603-2869

Email: <u>reports@lighthouse-services.com</u> (include our Company name in your email)

Technimark will make every reasonable attempt to ensure that your concerns are addressed appropriately. Remember, an issue cannot be addressed unless it is brought to someone's attention.

WHAT TO EXPECT WHEN YOU USE THE LIGHTHOUSE HOTLINE

The Lighthouse Hotline web portal and toll-free phone line are multilingual and available 24 hours a day, seven days a week. Trained specialists from an independent third-party service will answer your call, document your concerns, and forward a written report to Technimark for further investigation.

When you contact the Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

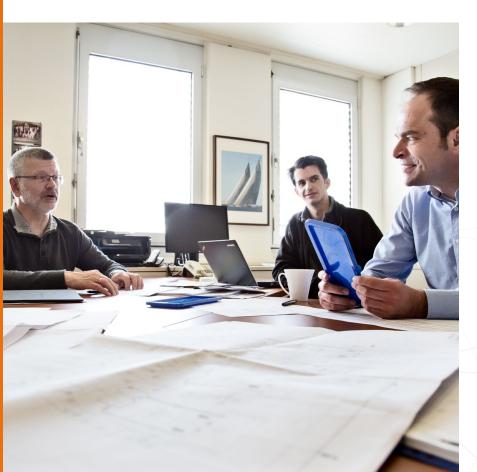
After you make a report, you will receive a personal identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Technimark will not be able to inform you about individual disciplinary actions.

The Hotline will not disclose your identity without your express permission. Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

OUR COMMITMENT TO NON-RETALIATION

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies, or the law, or who assists in an investigation of suspected wrongdoing.

Reporting "in good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.



WHAT IF?

I suspect there may be some unethical behavior going on in my business unit involving my supervisor. I know I should report my suspicions, and I'm thinking about using the Hotline, but I'm concerned about retaliation. You are required to report misconduct and, in your situation, using the Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.

I believe someone has misused the Hotline, made an anonymous call and falsely accused someone of wrongdoing. What should I do? Report your concern immediately to your supervisor or site Human Resources Manager. Experience has shown that the Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on reports, and anyone who uses the Hotline in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.



WANT TO KNOW MORE? **Problem Solving Policy**

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OUR WORKPLACE

RESPECT, DIVERSITY, AND ANTI-DISCRIMINATION

HARASSMENT-FREE WORKPLACE

HEALTH AND SAFETY

VIOLENCE-FREE WORKPLACE



INNOVATING WITH INTEGRITY

RESPECT, DIVERSITY, AND ANTI-DISCRIMINATION

Technimark helps bring together employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute, and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement in all our departments, programs, and worksites.

This means we base employment decisions solely on qualifications, demonstrated skills, and achievements – and never on gender, race, color, religion, age, disability, sex (including pregnancy, sexual orientation, or gender identity), genetic information, nationality, citizenship, veteran status, political opinion, social or ethnic origin, or any other legally protected category.



Technimark is passionate about our people. We have molded Diversity into a work environment that supports and celebrates the uniqueness of our employees. We understand that building an inclusive culture sparks creativity and innovation, which sustains our position as a leader of high-quality plastic products and packaging solutions for global markets.



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RESPECT, DIVERSITY, AND ANTI-DISCRIMINATION



- > Treat others respectfully and professionally.
- > Promote diversity in hiring and other employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or Company policy.

င္နိ¹်င္ပီ WATCH FOR

- Comments, jokes, or materials, including emails, which others might consider offensive.
- Inappropriate bias when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do? You should notify your supervisor or site Human Resources Manager. Sending these kinds of jokes violates our values as well as our policies that relate to the use of email and our standards on respect, diversity, anti-harassment, and anti-discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

WANT TO KNOW MORE? Equal Opportunity Policy Courtesy and Respect Policy

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HARASSMENT-FREE WORKPLACE

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

SEXUAL HARASSMENT

A common form of harassment is sexual harassment, which in general occurs when:

- > Actions of a sexual nature that are unwelcome, are made a condition of employment, or used as the basis for employment decisions.
- > An intimidating, offensive, or hostile work environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

DO RIGHT

- Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- > Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- > Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- > Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

Solution WATCH FOR

- > Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- > Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.
- > The display of sexually explicit or offensive pictures or other materials, including electronic materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- > Verbal abuse, threats, or taunting.

WHAT IF?

I frequently hear a colleague making derogatory comments to another coworker. These comments make me feel uncomfortable, but I feel like it's none of my business, and the person they're directed at will speak up if they are offended. Should I ignore this? No, you shouldn't. It's up to each of us to help maintain a work environment where people feel welcomed, valued, and included. Since you're aware of this situation, you have a responsibility to speak up about it. If you feel you can, speak to your colleague and ask that this behavior stop. If you feel you can't or the comments continue, talk to your supervisor or site Human Resources Manager.



WANT TO KNOW MORE? کی Courtesy and Respect Policy

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CODE OF CONDUCT

INNOVATING WITH INTEGRITY

HEALTH AND SAFETY

Safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for you, for our Company, and for every employee on the job, every day. Do your part to keep everyone in the Technimark family injury-free.

ALCOHOL AND DRUGS

While at work or on Technimark business:

- You should be always ready to carry out your work duties never impaired.
- The use of alcohol and drugs is strictly prohibited. Using, possessing, or being under the influence of any substance – including prescription and over-the-counter medications – that could impair your performance, interfere with a safe and effective work environment, or harm our Company's reputation is a violation of our Code and the law.

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- Follow the safety, security, and health rules and practices that apply to your job.
- Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, cords, and other potential hazards.
- Notify your supervisor immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. If your supervisor is not available, immediately notify your site EHS team. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- > Cooperate with any investigations into incidents.

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- > Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.

I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker. Discuss your concerns with your supervisor, Safety Manager, or EHS Manager. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not make you a troublemaker, but a responsible employee concerned about the safety of others.

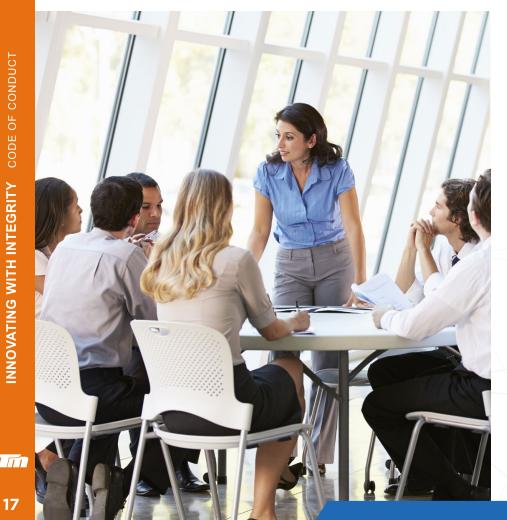


INNOVATING WITH INTEGRITY COD

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VIOLENCE-FREE WORKPLACE

Every Technimark workplace should be a safe place - free from violence, which has no place in our Company. We do not tolerate violence and take any threats seriously. We also depend on every employee to help us maintain a positive environment by using care in their own interactions and staying alert for potential violence.



C DO RIGHT

- > Practice kindness and respect in every interaction. Expect the same from others.
- > Watch for and report warning signs of potential violence. Don't ignore your concerns and don't wait to report them. Notify your supervisor immediately.

WATCH FOR

- > Intimidating, threatening, or hostile behavior.
- > Causing or attempting to cause physical injury to another.
- > Acts of vandalism, arson, or other criminal activities.
- > The carrying of firearms or other weapons onto Company property unless specifically authorized by the Company.

WHAT IF?

A coworker was complaining to me about work and mentioned wanting to hurt a supervisor. I assumed this colleague was just frustrated, so I ignored it. Today, I saw the same person angrily break a piece of equipment. Should I report it? Yes. This behavior could be a warning sign of potential violence. Don't ignore it. Speak up right away. In this case, you should have spoken up on the first day. You could end up helping a troubled colleague and preventing a potentially dangerous situation.

WANT TO KNOW MORE? Workplace Violence Prevention Policy

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OUR ASSETS AND INFORMATION

COMPANY ASSETS

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

DATA PRIVACY

FINANCIAL INTEGRITY

RESPONSIBLE COMMUNICATIONS



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COMPANY ASSETS

Each of us is entrusted with Company assets – the resources we own or use to conduct our business, including our intellectual property. We are personally responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.

© ■ PHYSICAL AND □ □ □ □ ELECTRONIC ASSETS

Physical assets include Technimark facilities, materials, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security, and integrity. Be aware that any information you create, share, or download onto Company systems belongs to Technimark, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.

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- Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities.
- > Be a good steward of our electronic resources and systems, and practice good cybersecurity:
 - Do not share passwords or allow other people, including friends and family, to use Technimark resources.
 - Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on Company computers or other equipment to conduct Company business is strictly prohibited. If you have any questions about whether a particular use of software is licensed, contact the IT Department.
 - Lock your workstation when you step away and log off our systems when you complete your work for the day.
 - Beware of phishing attempts use caution in opening email attachments from unknown senders or clicking on suspicious links.

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- > Requests to borrow or use Technimark equipment without approval.
- > Excessive use of Technimark resources for personal purposes.
- > Unknown individuals without proper credentials entering our facilities.

WANT TO KNOW MORE?

Business Guidelines Policy Electronic Use Policy and Agreement

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CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Technimark relies on each of us to be vigilant and protect confidential information and intellectual property – some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know to do their job, and only using it for authorized purposes.

Be aware that your obligation to restrict your use of Technimark confidential information and intellectual property continues even after your employment ends.

- Promptly disclose to Company management any inventions or other IP that you create while you are employed by Technimark.
- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- > Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate Company information using Technimark information systems.

WATCH FOR

- Discussions of Technimark confidential information in places where others might be able to overhear – for example on planes and elevators and when using phones.
- Sharing confidential, nonpublic information (whether it belongs to Technimark or another entity) on social media or sending it to unattended devices or printers.



INTELLECTUAL PROPERTY

Examples of intellectual property (IP) include:

- > Business and marketing plans
- > Company initiatives (existing, planned, proposed, or developing)
- Customer lists
- > Trade secrets and discoveries
- > Methods, know-how, and techniques
- > Innovations and designs
- > Systems, software, and technology
- > Patents, trademarks, and copyrights

Technimark commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business and continued job creation. Contact your supervisor or the General Counsel if you receive questions regarding:

- > The scope of intellectual property rights.
- > The applicability of Technimark rights to another company's products.
- The applicability of a third party's intellectual property rights to Technimark intellectual property rights or products.



WANT TO KNOW MORE? Business Guidelines Policy

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DATA PRIVACY

As we conduct our business, our employees, customers, and business partners may share personal information, referred to as Personally Identifiable Information (PII), with us. We respect the personal information of others and recognize our responsibility to handle this information with care and follow data privacy laws to prevent misuse or improper disclosure.

A variety of laws exist around the world that are designed to protect personal information and govern how this data should be collected, stored, disposed of, and shared with third parties. Although laws vary from country to country, we comply with those laws everywhere we operate.

There are two types of PII: public and private. Knowing the differences will help you understand and know the actions needed to ensure its safety and integrity.

Public Personally Identifiable Information

Information that is available in public sources such as phone books, employee directories, or public websites. This might include information such as name, date of birth, race, gender, address, email, phone number, general educational credentials, photos and videos.

Protected Personally Identifiable Information

Information that, if lost, compromised or disclosed without authorization could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Examples of this type of information include social security number, username and password, passport number, credit card number or other financial information, mother's maiden name, and place of birth. Protected personal information requires special handling due to the potential risk associated with its disclosure.

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- If you are authorized to access personal data as a part of your job, know our policies and the laws in the countries where you do business. Follow them closely to protect personal data when collecting, accessing, using, storing, sharing, and disposing of it. The rules may differ in your location, so ask for guidance. Contact your supervisor or the General Counsel if you are ever unsure how a law may apply to you.
- Only use and share personal data inside or outside of Technimark for legitimate business purposes.
- Make sure you know the kind of information that is considered personal information.
- Practice good cybersecurity, following all Technimark processes to protect our networks, systems, and data from unauthorized access.

နှိန် WATCH FOR

- > Failing to shred or securely dispose of sensitive information.
- Sharing personal data with anyone who is not authorized without written consent, including via email or on social media.
- Using "free" or individually purchased internet hosting, collaboration, or cloud services that could put personal information at risk.
- Sending personal data to an unattended device, such as a public printer or discussing it in public.

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FINANCIAL INTEGRITY

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

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Documents should only be disposed of in compliance with Technimark policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact your supervisor or the General Counsel.

DO RIGHT

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all your business communications. Write as though someday the records you create may become public documents.
- Report any suspicious financial transactions and activities to the General Counsel, and, if required, to appropriate government agencies.



Money laundering is a global problem with far-reaching and serious consequences. It is the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose Technimark and the individuals involved to severe sanctions.

We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate.

FINANCIAL INTEGRITY

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- Records that are not clear and complete or that obscure the true nature of any action.
- > Undisclosed or unrecorded funds, assets, or liabilities.
- > Improper destruction of documents.
- Attempts to pay in cash or in a different currency than shown on the invoice.
- Requests to ship to a country that differs from where the payment originated.
- > Avoidance of recordkeeping requirements.
- > Payments made by someone who is not a party to the transaction.
- > Unusual changes to a customer's normal pattern of transactions.

At the end of the last quarter reporting period, my supervisor asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work had not yet started. I agreed to do it since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing. No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.



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RESPONSIBLE COMMUNICATIONS

Technimark is committed to maintaining honest, professional, and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, each of us must help the Company ensure that only authorized persons speak on behalf of Technimark. Refer any communications with the media, investors, stock analysts, and other members of the financial community to executive management.

ແລະ ເຊິ່ງ WATCH FOR

- > Giving public speeches or writing articles for professional journals or other public communications that relate to Technimark without appropriate management approval.
- > The temptation to use your title or affiliation outside of your work for Technimark without it being clear that the use is for identification only.
- > Invitations to speak "off the record" to journalists or analysts who ask you for information about Technimark or its customers or business partners.



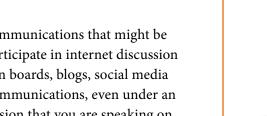
WANT TO KNOW MORE? Social Media Policy

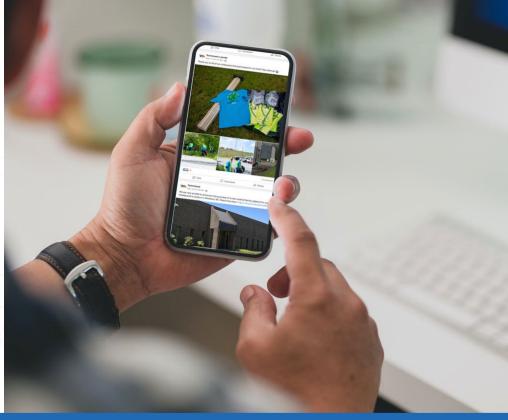


Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Technimark.

If you believe a false statement about our Company has been posted, do not post or share nonpublic information, even if your intent is to "set the record straight." Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact Corporate Communications.







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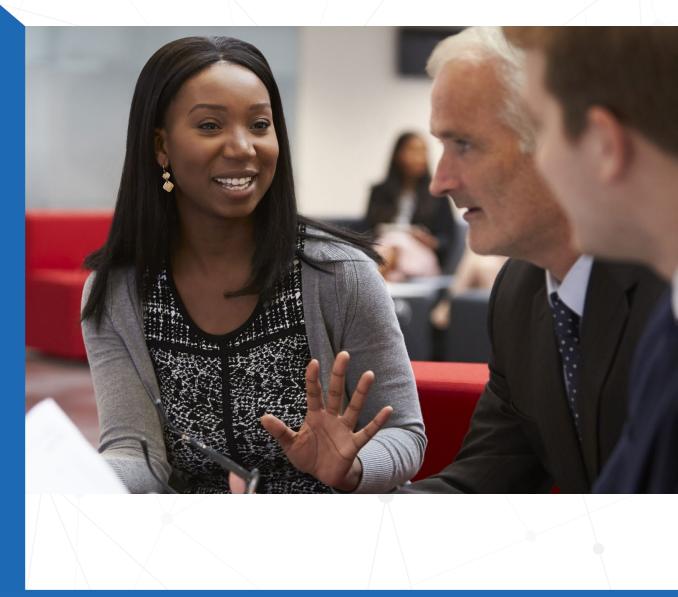
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OUR RELATIONSHIPS

CONFLICTS OF INTEREST

GIFTS AND ENTERTAINMENT

FAIR DEALING AND ETHICAL RELATIONSHIPS



INNOVATING WITH INTEGRITY

CONFLICTS OF INTEREST

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of Technimark. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clearcut, you need to fully disclose them to your supervisor so that they can be properly evaluated, monitored, and managed.

DO RIGHT

- > Avoid conflict of interest situations whenever possible.
- > Always make business decisions in the best interest of Technimark.
- > Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with Technimark.
- > Discuss with your supervisor full details of any situation that could be perceived as a potential conflict of interest.

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

CORPORATE OPPORTUNITIES

If you learn about a business opportunity because of your job, it belongs to Technimark first. This means that you should not take that opportunity for yourself unless you get written approval from an Officer of the Company.

FRIENDS AND RELATIVES

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On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor, or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your supervisor to determine if any precautions need to be taken.

OUTSIDE EMPLOYMENT

To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your supervisor. Outside activity must not interfere with your work at Technimark. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with Technimark.

PERSONAL INVESTMENTS

A conflict can occur if you have significant ownership or other financial interest in a competitor, business partner, or customer. Make sure you know what's permitted – and what's not – by talking with your supervisor or site Human Resources Manager.

CIVIC ACTIVITIES 200

Unless approved by Company management, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.

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GIFTS AND ENTERTAINMENT

A modest gift may be a thoughtful "thank you," or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Technimark strongly discourages our employees from accepting gifts or other favors from suppliers. Only offer and accept gifts and entertainment that comply with our policies and make sure that anything given or received is accurately reported in our books and records.

GOVERNMENT OFFICIALS

Be aware that the rules for what we may give to – or accept from – government officials are much stricter. What may be permissible for our business partners may be illegal when dealing with the government. Don't offer anything of value to a government official without obtaining approval, in advance, from the Chief People Officer. And remember: We do not accept or provide gifts, favors, or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision. Please refer to the <u>Anti-Corruption and Anti-Bribery section</u> of our Code for more information.

DO RIGHT

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to or accept them from a business partner with whom you are involved in contract negotiations.
- Make sure that anything given or received complies with the Company policies of both the giver and the recipient.
- > Never give or accept cash or cash equivalents.
- > Do not request or solicit personal gifts, favors, entertainment, or services.
- Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.

WATCH FOR

- Giving or accepting gifts or entertainment that could be embarrassing or reflect poorly on you or our Company.
- > Gifts, favors, or entertainment that may be reasonable for a business partner like a supplier but not for a government official or agency.

When traveling, I received a gift from a business partner that I believe was excessive. What should I do? You need to let your supervisor or Human Resources Manager know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.



Anti-Corruption Policy

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FAIR DEALING AND ETHICAL RELATIONSHIPS

The way we interact with others directly impacts Technimark's reputation. We seek out suppliers and other business partners who share our commitment to integrity and treat everyone with whom we work fairly. We strive to understand the needs of our customers and seek competitive advantages through superior performance – never through unethical or illegal practices. We tell the truth about our services and capabilities and never make claims that aren't true. In short, we treat others the way we would like to be treated.



Technimark evaluates and engages with qualified suppliers on an objective basis grounded in fairness. When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to our Company. All agreements are negotiated in good faith and must be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law, and in a way that's consistent with our Code, our policies, and our values.



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FAIR DEALING AND ETHICAL RELATIONSHIPS

CONFLICT MINERALS

We are committed to responsible and ethical sourcing of materials used in our products and work to keep conflict minerals out of our supply chain. Revenue from conflict minerals has been linked to funding for groups engaged in extreme violence and human rights atrocities. We work closely with suppliers of raw materials, parts, and components and communicate our expectation that suppliers will comply with all applicable laws, including laws aimed at providing conflictfree minerals.



DO RIGHT

- > Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.
- > Never take unfair advantage of anyone by manipulating, concealing, misrepresenting material facts, abusing privileged information, or any other unfair dealing practice.
- > Never grant a customer's request to do something that you regard as unethical or unlawful.
- > Speak with your supervisor if you have concerns about any error, omission, undue delay, or defect in quality or our customer service.
- > Never pay or offer to pay anyone, including colleagues or any other provider to refer an individual. If you are offered any kind of payment for a referral, turn it down.

WATCH FOR

- > Pressure from colleagues or managers to cut corners on quality or delivery standards.
- > Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.
- Improper gift-giving. Federal and state laws and our policies strictly limit what we may give others in the way of gifts, entertainment, promotional items, and other hospitality and business courtesies. See the Gifts and Entertainment section to learn more.



WANT TO KNOW MORE?

Supplier Social Responsibility Policy

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OUR REPUTATION

FAIR COMPETITION

ANTI-CORRUPTION AND ANTI-BRIBERY

IMPORTS, EXPORTS, AND GLOBAL TRADE

PRODUCT SAFETY AND QUALITY

COOPERATION WITH INVESTIGATIONS



INNOVATING WITH INTEGRITY

FAIR COMPETITION

We believe in free and open competition and never engage in practices that may limit it. We never look to gain competitive advantage through unethical or illegal business practices. Domestic and international competition laws (sometimes called "antitrust laws") are complex, and compliance requirements can vary depending on the circumstances. Use good judgment and seek help with any questions about what is appropriate and what isn't.

In general, the following activities are red flags, should be avoided, and, if detected, reported to the General Counsel.

- Sharing our Company's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- > Attempting to obtain competitively sensitive information from others.

GATHERING BUSINESS

Information about our competitors and their customers and suppliers is a valuable asset in today's competitive business environment. We gather competitive information only through legal and ethical means, never through fraud, misrepresentation, deception, or the use of technology to "spy" on others.



DO RIGHT

- Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.
- Do not engage in conversations with competitors about competitively sensitive information.
- > Be careful when accepting information from third parties. You should know and trust their sources, and be sure that the information they provide is not protected by trade secret laws, nondisclosure, or confidentiality agreements.
- Respect the obligations of others to keep competitive information confidential, including former employees of competitors, who are obligated not to use or disclose their former employer's confidential information.

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- > Collusion when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- > Bid-rigging when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- > Tying when a company with market power forces customers to agree to services or products that they do not want or need.
- > Predatory pricing when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.
- Retaining papers or computer records from prior employers in violation of laws or contracts.
- > Using anyone else's confidential information without appropriate approvals.
- > Using job interviews as a way of collecting confidential information about competitors or others.
- Receiving suggestions from third parties for new products, product features, or services when the source of the original idea is not fully known.

WHAT IF?

I received sensitive pricing information from one of our competitors. What should I do? You should contact the General Counsel without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.



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ANTI-CORRUPTION AND ANTI-BRIBERY

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. Technimark is committed to complying with all applicable anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and similar laws in other countries which prohibit improper offers to government officials or other individuals.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents our Company.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all business partners who work on our behalf, particularly when dealing in countries with high corruption rates and in any situations where "red flags" would indicate further screening is needed before retaining the business partner. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.

Bribery means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial, or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.

Government officials include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities.





- > Understand the anti-bribery laws which apply to your role at Technimark.
- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- > Accurately and completely record all payments to third parties.

- > Apparent violations of anti-bribery laws by our business partners.
- > Third-party agents who do not wish to have all terms of their engagement with Technimark clearly documented in writing.

WHAT IF?

I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay this agent goes toward making payments or bribes to government officials. What should I do? This matter should be reported to the Chief People Officer and the General Counsel for investigation. If there is bribery and we fail to act, both you and our Company could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any agent doing business with us should understand the necessity of these measures. It is important and appropriate to remind our agents of this policy.



WANT TO KNOW MORE?

IMPORTS, EXPORTS, AND GLOBAL TRADE

Technimark has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import, export, and re-export of our products. We must also comply with the laws of the countries where our products are manufactured, repaired, or used. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

If your responsibilities include exporting products or receiving imported products, you are responsible for screening customers, suppliers, and transactions to ensure that we comply with all applicable import and export requirements.

O RIGHT

- Obtain all necessary licenses before the export or re-export of products, services, or technology.
- Report complete, accurate, and detailed information regarding every imported product, including its place(s) of manufacture and its full cost.
- Direct any questions you have regarding imports or exports of our products, parts, or technology to your site Controller and Operations team.

^{ୁନ}ି **WATCH FOR**

- Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, or database access. This restriction applies to sharing information with coworkers, as well as non-employees.
- Transporting Company assets that contain certain technology (such as a computer an associate takes on a business trip) to another country.

ANTI-BOYCOTT REGULATIONS

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support, or furnish information concerning a non-U.S.-sanctioned boycott.



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PRODUCT SAFETY AND QUALITY

We are dedicated to earning and maintaining the trust of our customers by ensuring the quality, safety, and performance of our products. Each of us, as well as our business partners, are expected to meet all product quality and safety specifications and our customers' expectations.



We deliver on our promises and ensure that we meet the highest standards by:

- Innovating our processes and operations everywhere we do business.
- Testing and evaluating the performance of our products to ensure that only those of the highest quality reach our customers.
- Measuring our performance against stated goals and always striving for improvement.

REPORTING ADVERSE EVENTS

We have an obligation to report any issue that could compromise the quality or safety of the products or services we provide to our customers and applicable regulatory authorities. If you see, suspect, or become aware of a situation that is unsafe, doesn't comply with Technimark quality policies or procedures, or could adversely affect any of our products, you have a responsibility to immediately bring it to the attention of your supervisor or a Corporate Quality representative. By acting quickly, you help us to address and correct the issue before it presents a risk to those we serve.

DO RIGHT

- Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality or safety of our products.
- Do your part to ensure complete and accurate quality testing and reporting of results.
- Routinely check equipment and processes to ensure they conform to specifications and expectations – work toward continuous improvement.
- > If you see or suspect activity that goes against our commitment, speak up.

I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do? Technimark never sacrifices quality to meet a deadline or target. You should report the matter immediately to your supervisor or a Corporate Quality representative.

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COOPERATION WITH INVESTIGATIONS

At times, employees may be asked to participate in internal and external investigations and audits that are conducted by our Company. All employees are expected to fully cooperate with all such requests and ensure that any information you provide is true, accurate, and complete.

You may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify your supervisor and the General Counsel before taking or promising any action. If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate, and complete.



- Falsified information. Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- > Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.



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OUR WORLD

SUSTAINABILITY AND ENVIRONMENTAL STEWARDSHIP

RESPECT FOR HUMAN RIGHTS

POLITICAL INVOLVEMENT

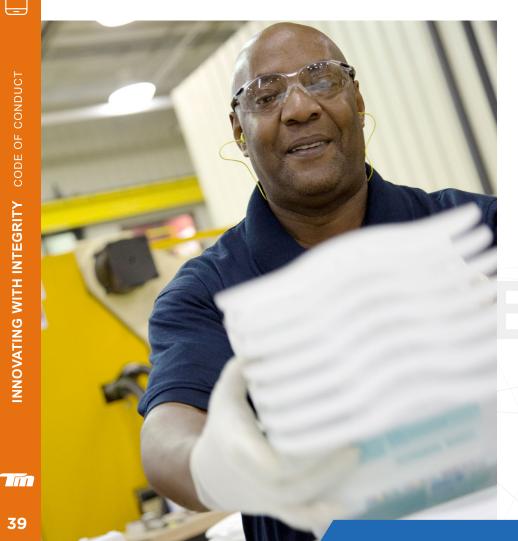
CORPORATE CITIZENSHIP





SUSTAINABILITY AND ENVIRONMENTAL STEWARDSHIP

We recognize our environmental and societal responsibilities sustainability is incorporated into everything we do. We are committed to resource conservation, minimizing damage to the environment, as well as any potential harm to the health and safety of our employees, customers, and the public.



ि DO RIGHT

- > Protect employee safety and the environment. Read and understand all the information provided by our Company that is relevant to your job and operate in full compliance with environmental, health, and safety laws and regulations.
- > Fully cooperate with environmental, health and safety training, and with our Company's periodic compliance reviews of our products and operations.
- > Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- > Provide complete and accurate information in response to environmental, health, and safety laws, regulations, and permits.
- > Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.

Contact your supervisor, Plant Manager, or EHS Manager if you have any questions about compliance with environmental, health and safety laws, and policies.



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RESPECT FOR HUMAN RIGHTS

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor.

DO RIGHT

- > Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- > Remember that respect for human dignity begins with our daily interactions with one another, our business partners, and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

WHAT IF?

When I was visiting a new supplier, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps? You did the right thing first to be on the lookout for human rights abuses and second to raise the issue with our supplier. The next step is to report the incident to your supervisor and the Senior VP of Global Sourcing. We are committed to human rights and to the elimination of human rights abuses including child labor.



WANT TO KNOW MORE? Supplier Social Responsibility Policy



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POLITICAL INVOLVEMENT

Each of us has the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of Technimark, and never use Company funds, time, or the Technimark name for any political purpose without proper authorization.

- Ensure that your personal political views and activities are not viewed as those of the Company.
- Do not use our resources or facilities to support your personal political activities.
- Follow all federal, state, local, and foreign election laws, rules, and regulations as they relate to Company contributions or expenditures.

လို WATCH FOR

- Lobbying. Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with an Officer of the Company.
- Pressure. Never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.
- Improper influence. Avoid even the appearance of making political or charitable contributions to gain favor or exert improper influence.
- Conflicts of interest. Holding or campaigning for political office must not create or appear to create a conflict of interest with your duties at Technimark.

I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at Technimark if I don't use any Company funds or resources? No. It would be improper to associate our name in any way with your personal political activities.

I would like to invite an elected official to speak at an upcoming Company event. Would that be a problem? You must get approval from an Officer of the Company before inviting an elected official or other government official to attend a Company event. If the invitee is in the middle of a reelection campaign, the Company event could be viewed as an endorsement of the candidate. Depending on local laws, any food, drink, or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.



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CORPORATE CITIZENSHIP

Corporate social responsibility is an integral part of Technimark's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time and talent to support Company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

Technimark also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you're participating on your own time and at your own expense. Never pressure your colleagues to participate. Unless you receive approval in advance, please do not use Technimark funds, assets, or the Technimark name to further your personal volunteer activities.

POSITIVITY



OUR RESOURCES

RESOURCE	CONTACT
Lighthouse	Online: <mark>lig</mark> l
Hotline	Phone:

Online: lighthouse-services.com/technimark Phone:

Country	Phone Number
USA and Canada (English-speaking)	800-401-8004
USA and Canada (Spanish-speaking)	800-216-1288
Canada (French-speaking)	855-725-0002
Mexico	01-800-681-5340
China	400-120-9050
Germany	0800-183-0724
Ireland	1-800-948-326
UK	0-808-189-0041
All other countries	Click here for dialing instructions. 1. Dial toll-free country access code 2. Dial 800-603-2869

Email: <u>reports@lighthouse-services.com</u> (include our Company name in your email)



INNOVATING WITH INTEGRITY

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OUR POLICIES

Throughout the Code, we have referenced the following corporate policies that may provide greater detail to help you in making the right decisions. No Code or set of policies can cover every question you have or address every situation you face. We rely on you to use good judgment and ask for help when you need it.

Anti-Corruption PolicyBusiness Guidelines PolicyCourtesy and Respect PolicyElectronic Use Policy and AgreementEqual Opportunity PolicyProblem Solving PolicySafety Program PolicySocial Media PolicySocial Responsibility PolicySupplier Social Responsibility PolicySustainability PolicyWorkplace Violence Prevention Policy





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A FINAL WORD OF THANKS

Thank you for taking the time to read our Code of Conduct. We know it's a lot of information to take in, but it's critically important to Technimark that you understand your responsibilities as a member of our team.

When you know the Code and reflect our Values every day, in every action, you're Innovating With Integrity. It's a way of working and interacting with others that strengthens Technimark's foundation and helps us fulfill our mission while making sure our actions speak louder than our words.

As you return to work, keep the Code in mind and use it often to help you make the right decisions for Technimark, our communities, and everyone we serve. When we demand the best from ourselves and each other, it shows in our work, the partnerships we forge, and the trust we build.

If you have questions about the Code or need further guidance, please don't hesitate to ask.





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