



ENVIRONMENTAL, SOCIAL, & GOVERNANCE REPORT

Policies and Statements

January 2023
REV 1



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CODE OF BUSINESS CONDUCT

Commercial Plastics is dedicated to conduct our business according to professional, ethical, and legal standards. We monitor and adhere to applicable local laws and regulations (both stated and Federal) while practicing common sense behaviors to guide each employee toward the correct course of actions.

Our standards, provide employees a set of guiding principles and acceptable behaviors on their personal conduct. Conduct impacts the company, our suppliers, and customers. The following set of principles were designed to provide all employees guidance to maintain Commercial Plastics integrity and business reputation.

Standards

Conflict of Interest

To protect our business interests, we ask our employees to avoid activities or relationships that conflict with Commercial Plastics interests or adversely affect the company's reputation. No policy can describe every situation that may constitute a conflict of interest. The purpose of these guidelines is to provide general direction

A conflict of interest can be described as a situation in which your loyalty is, or may appear to be, divided between your self-interest or the interests of a third party and the interests of Commercial Plastics. Types of activities and relationships to avoid include, but are not limited to:

- Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefit in exchange for favorable decisions or actions in the performance of your job or that might appear to influence your decision-making or professional conduct;
- Personally engage in, directly or indirectly, own, manage, operate, join, control, consult with, participate in the ownership, operation or control of, be employed by, or be connected in any manner with any person or entity which solicits, offers, offers to provide, or provides any services or products similar to those which Commercial Plastics offers to its customers or prospective customers;
- Accepting a kickback, bribe, substantial gift (anything more than token), or special consideration as a result of any transaction or business dealings involving Commercial Plastics;
- Giving preferential treatment in business dealings to any person or company in whom you, a relative, or friend has a significant ownership interest or relationship. You must disclose actual or potential conflicts or any relationships that may create the appearance of a conflict of interest to your manager as soon as you become aware of them so that safeguards can be

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established to protect all parties. If you have questions about what constitutes a conflict of interest, please contact our HR department

Protection of Confidential Information

The protection of confidential business information and trade secrets is vital to Commercial Plastics interest and success. This and other information have actual and/or potential independent economic value, especially for our customers, and is subject to our reasonable effort to maintain its confidentiality. At the time of hire, employees are required to sign a Confidentiality agreement. Employees who improperly use or disclose trade secrets of confidential business information are not aligned with corporate social responsibility to our customers and suppliers' commitment.

Compliance with Laws, Rules, and Regulations

Commercial Plastic's employees must observe the laws, rules and regulations of each state in which they operate. Guidance should be sought from Corporate Human Resource department.

Relationships with Customers and Suppliers

Each employee has the responsibility to ensure there are no compromises in delivering the highest standard of services and products and that every aspect of our operation which impacts upon quality promotes and reflects these standards. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts.

The giving and receiving of gifts, entertainment and gratuities between employees and suppliers or other outside business acquaintances represents a source of potential conflict of interest. Any significant gift likely to be deemed as influential upon decision making is unacceptable.

Our Employees

All of the employees that work for this company must work together and, in a manner, that positively impacts each other in regard to performance, productivity, and personal satisfaction in their jobs. We operate under the "Golden Rule" and expect our employees to adhere to the same standards. Commercial Plastics expects all employees to treat others, as they want to be treated and to follow rules of conduct that will protect the interests and safety of all employees and the organization as outlined in our Employee Handbook.

Commercial Plastics is committed to offering Equal Employment Opportunities (EEOC). We often have employees with multi-culture backgrounds, as such, we strive to be inclusive and tolerant.

To provide equal employment and advancement opportunities to all individuals, employment decisions at Commercial Plastics will be based on merit, qualifications, and abilities. We do not discriminate in employment opportunities or practices based on race, color, creed, religion, sex,

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national origin, age, disability, marital status, sexual orientation, genetic information, citizenship status, order of protection status, military status, arrest and conviction record, or any other characteristic protected by law.

We will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. If you have any questions about any type of discrimination in the workplace, you are encouraged to bring these issues to the attention of your immediate manager or Human Resources.

Compliance with this Code and Reporting of any Unethical Behavior.

Commercial Plastics encourages employees who have a legitimate concern or knowledge of alleged illegal, dishonest fraudulent activity or unethical actions within Commercial Plastics, to contact Commercial Plastics corporate Human Resource department, immediately. If the Human Resource department is subject of the complaint employees are encouraged to speak to another member of senior management who will be responsible to investigate the incident.

The purpose of this Whistleblower Policy is to create an ethical and open work environment, to ensure that Commercial Plastics has a governance and accountability structure that supports its mission, and to encourage employees to raise legitimate concerns about the occurrence of illegal or unethical activities within Commercial Plastics instead of turning to outside parties for resolution.

Insofar as possible, confidentiality will be maintained. However, identities may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. Commercial Plastics will not retaliate, nor permit retaliation against any employee who in good faith makes a complaint or participates in an investigation due to legitimate concern under this policy. This does not include immunity for any personal wrongdoing that is alleged and investigated.

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DIVERSITY, EQUITY & INCLUSION POLICY

Commercial Plastics is dedicated to implementing an inclusive, diverse, and equal work environment. We celebrate and embrace the unique experience, perspectives, and cultural backgrounds each employee brings to our workplace. CP strives to foster an environment where our employee's feel respected, valued and empowered to work together to positively impact each other to achieve performance, productivity, and personal satisfaction.

Commercial Plastics is committed to taking the following actions to support diversity, equity, and inclusion in our workplace:

- Provide ongoing education and training to all employees on diversity, equity, and inclusion topics.
- Provide all employee with a safe avenue to voice concerns regarding, diversity, equity, and inclusion in our workplace.
- Support flexible work arrangements that accommodate the different needs of all employees.
- Conduct periodic focus groups to identify areas where there is room for growth.

Employee Conduct

Commercial Plastics expects all employees to treat others, as they want to be treated and to follow rules of conduct that will protect the interests and safety of all employees and the organization as outlined in our Employee Handbook. This includes practices and policies on recruitment and selection, compensation and benefits, professional development including training opportunities, promotions, transfers, layoffs, and terminations, as part of our ongoing development of a workforce built on the premise of gender and diversity equity that encourages and enforces:

- Respectful and courteous communications between all employees by refraining from rude, offensive, or outrageous behavior, including ridicule, hostile jokes or idioms that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities, and other obligations, when possible.
- Treat coworkers, customers, and vendors with patience, respect, and consideration. To be open-minded and listen when given constructive feedback.
- Communicate openly with supervisor, managers, and coworkers.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.

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Commercial Plastics will not tolerate discrimination, harassment, or any behavior or language that is abusive, or unwelcome.

Violations

Employees are expected to report incidents that violate the Employee Conduct policy by contacting a manager or human resource.

All Commercial Plastics teammates have a responsibility to always treat others with dignity and respect. Teammates are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action. Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor and Human Resources.

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ENVIRONMENTAL, HEALTH, and SAFETY

Commercial Plastics believes that a successful business must be profitable, while caring for its people, its communities, and its world. We believe that we must be environmentally responsible in all that we do and take a leadership role to promote environmentally sound practices in industry and in our communities. As with all other aspects of our company mission, we strive for continuous improvement in our environmental affairs.

We are committed to sustainable development and operations, to employing “closed loop systems” and to conserving energy. We implement our environmental philosophy through maximizing the use of recycled materials in our processes and recycling our materials wherever possible. Additionally, we make every effort to minimize the negative impact of all company operations, accomplished, in part, by conducting environmental impact and energy conservation audits.

Environmental

We are committed to environment sustainability. Reducing our environmental impact isn't the responsibility of a designated company department or even a cross-functional task force. It exists with each area and is a challenge placed squarely in front of each employee.

Commercial Plastics shows that commitment through a number of ways.

- Energy efficient lighting using 60% less energy
- Energy-saving motion sensors for Lighting
- Ambient light detectors -adjusting to the amount of artificial light used based on amount of natural light available.
- Variable frequency drives on presses, which automatically vary the energy usage depending on the process running. Initial energy savings over the replace conventional methos is averaging 29%.
- Heater bands to insulate, generate and transmit heat more efficiently on injection presses. Initial reduction in energy and electrical consumption is averaging 30%
- Reducing inline air pressure setting when possible
- Using purging compound, creating a 25% reduction in start-up resin waste
- Using 500 reusable shipping containers.

Each Business Area is responsible for identifying any adverse environmental impact associated with its activities, products and services and to control them by developing, implementing and maintaining management systems which are consistent with this policy and which reflect the environmental circumstances of their businesses including the needs of their customers.

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Where appropriate our business areas will implement management systems which are compatible with applicable ISO standards and include targets, monitoring of performance and auditing. In doing this we will seek to ensure, through the efficient use of resources, a reduction in any negative environmental impacts whilst also positively influencing business performance.

Health & Safety

At Commercial Plastics, safety and well-being is built on a simple principal; create a culture of safety and health so each employee goes home each day safe and injury free. The CP Safety Program continually strives for the goal of **ZERO ACCIDENTS AND INJURIES**. While the Wellness Program stived to create and maintain a culture of well-being at Commercial Plastics.

Commercial Plastics' strong commitment to a safe workplace goes well beyond stating its compliance with the federal, state, and local regulations. Safety is very important to us, and we are committed to manufacturing our products in a safe, efficient, and environmentally responsible way.

To achieve a healthy & safe culture and environment Commercial Plastics is committed to:

- Ensuring that our Quality Policy is communicated and understood at all levels of organization
- Implementing, maintain and continually improving the effectiveness of the Quality Management System described in our manual.
- Setting appropriate Quality Policies and objectives and ensuring their ongoing suitability.
- Ensuring this management system complies with all stated and federal statutory and regulatory requirements, the ISO Certified Standard.
- Safety committee consisting of multi-level of employees.
- Noise level testing
- Wellness Committee (Monthly wellness initiatives and programs)

Each Business Area is responsible for identifying health and safety risks associated with its activities, and for developing, implementing, and maintaining management systems and working practices leading to continual improvement in our safety performance. Business Leaders are responsible for establishing safety objectives and monitoring safety performance within their own Business Areas. This will include auditing with an associated program of risk improvements.

Review

An annual review of this Policy will take place to take advantage of new business practices, technology and to ensure compliance with new laws as a minimum requirement, which should also be reviewed to determine its continued relevance, appropriateness, and effectiveness.

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Safety Meetings

Employee Commitment, Involvement & Views: Safety meetings will be open to all, to ensure formal recording of Employee and Management commitment and involvement.

Audits

Commercial Plastics will undertake independent Health & Safety Audits at least annually.

Environmental, Health and Safety Policy

It is the policy (Code of Conduct) of C.P. to protect the health and safety of our employees, customers, and the public, and to conduct all activities in an environmentally responsible safe manner. We commit to this policy worldwide as an integral part of being a world class plastic injection molding company. Corporate management has ensured alignment of C.P.'s worldwide business strategy and operations with this Environmental, Health and Safety (EHS) policy and is firmly committed to:

- The EcoVadis Corporate Social Responsibility (CSR) rating methodology to measure the quality of C.P.'s CSR management system through our policies, actions, and results. Based on the EcoVadis 7 founding principles.
- Conduct global operations in accordance with all applicable laws, regulations, and other requirements, anticipate EHS issues and promote appropriate voluntary initiatives that support this policy.
- Strive for an injury free workplace through high employee involvement and a strong health and safety program.
- Strive to continuously improve global EHS performance by utilizing practices that protect employees and the environment, including developing opportunities for recycling internal and external packaging and raw resins, improving energy efficiency and promote a healthy campus.
- Minimize the EHS impact to our employees, facilities, and communities in which we do business.
- Train and motivate employees to conduct their activities in a safe and environmentally responsible manner; and
- Review and report to the Operations Management on a periodic basis the EHS performance of the global operations which may include the setting and review of EHS objectives and targets used to promote continuous improvement.

Furthermore, C.P. has undertaken the responsibility to earn public trust by communicating about our policies, programs, and performance, and by advocating sound laws and regulations. Corporate management has overall responsibility for endorsing the policies adopted regarding EHS. Corporate management reviews this policy during Management Review meetings.

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EMPLOYEE DEVELOPMENT

Commercial Plastics is a leader in plastics injection molding and believes in the value of continuing education that will both enrich our employees and company. In a field with many breakthrough technological advancements, it is advantageous for employees as well as the company to support any/all avenues that further our growth and development.

As such, the company encourages qualified employees to seek opportunities to advance their skills and knowledge that will be both beneficial to the person and the company. Commercial Plastics continuously looks for ways to support our employees' development and growth and provide access to the people and tools that will help them do so. Employees are encouraged to focus on growth by creating development plans, having career conversations with managers, and taking action to build their skills and broaden their experiences.

TUITION REIMBURSEMENT POLICY

Policy

Commercial Plastics encourages and supports our employees to further their education and experience by reimbursing employee for tuition in accordance with the following guidelines.

Guidelines

- A. Employee Eligibility
 - a. The employee must be considered a permanent, full-time employee with the company for 1 year.
- B. Course Eligibility
 - a. Courses must be approved by upper management prior to enrollment.
 - b. The course content must be applicable to the employee's current role or a potential future role within the company.
- C. Limitations
 - a. Employee's must provide their own transportation and parking cost.
 - b. The employee must be employed by with the Company at the completion of the course to be reimbursed (unless for involuntary separation for reason other than violation of Company policies.)
 - c. Reimbursement will only be made for those courses which are completed with a letter grade "B" or higher, or Pass (P) in a pass/fail system.

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- d. Employee must pay the Company for the reimbursement, an amount equal to that installment payment and all later installment payments, with accrued interest at the rate of 2% per year ("Tuition Repayment Obligation") if on the third annual anniversary of the reimbursement payment, the employee has voluntarily quit or the Company had terminated the employee "for cause". "For Cause" means any material misrepresentation, theft or fraudulent act toward Commercial Plastics, and other employee or any company customer.

D. Procedure for Requesting Assistance

- a. Employee must submit to Human Resource the course schedule and cost of enrollment.
- b. Complete the Tuition Reimbursement Agreement (attached).
- c. Upon completion of the course, the employee will submit proof of grade.

TUITION REIMBURSEMENT AGREEMENT

This Tuition Reimbursement Agreement ("Agreement") is made and entered into as of _____, by and between _____ ("Employee") and Commercial Plastics ("Employer"). Employee is currently an employee of Employer. Employee has voluntarily applied to and been accepted into the following educational program at _____. The Employee and Employer agree the program is bona fide and designed to provide the employee with skills to perform his job duties. Employer has agreed, on the terms set forth in this Agreement, to financially reimburse Employee in paying tuition for this educational program. In exchange for Employer's financial assistance, Employee agrees to reimburse Employer either through work (by remaining employed with Employer for a specific time period as set forth in this Agreement) or by repayment (if Employee leaves before completing the agreed-upon service to Employer as provided in this Agreement).

In consideration of the mutual promises set forth in this Agreement, Employer and Employee agree as follows:

1. Tuition Repayment. Employer shall pay directly to Employee up to a total of \$ _____ toward the tuition for the educational program into which Employee has been accepted (the "Tuition Reimbursement"). This Tuition Reimbursement shall be paid following the successful completion of the semester of enrolled classes and verified through billing statements by _____ for the program.

2. Employee Obligation. Employee agrees to participate in and pursue the educational program to the best of his or her ability and to use reasonable efforts to complete the program. Employee must complete and achieve a satisfactory **letter grade of a B or higher**.

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3. Obligation Satisfied Three Years After Payment. Employee will have no obligation to pay Employer for a reimbursement payment if, on the third annual anniversary of that reimbursement payment, Employee has not voluntarily quit or has not been fired “for cause.” In the event Employee voluntarily quits his or her employment with Employer or Employer terminates Employee “for cause” less than three years after any reimbursement payment is made, Employee shall immediately pay, without demand, an amount equal to that installment payment and all later installment payments, with accrued interest at the rate of 2 % per year (“Tuition Repayment Obligation”). As used in this Agreement, “for cause” means any material misrepresentation, theft or fraudulent act toward Employer, any other employee or any client of Employer.

4. Set-off Against Final Paycheck. To the extent allowed by law, Employer may deduct the amount of any Tuition Repayment Obligation from any compensation due and owing to Employee at time of separation from employment including but not limited to salary, wages, bonuses, commissions, vacation pay, termination pay, and severance pay.

5. No Guarantee of Employment. Nothing in this Agreement constitutes a commitment or guarantee on the part of Employer to provide employment to Employee for any specific period of time or duration. Unless otherwise provided in a writing other than this Agreement, Employee’s employment shall remain “at-will.”

6. Indemnity. The Employee hereby indemnifies and saves harmless the Employer from and against all suits, claims, actions, damages and other losses which the Employer suffers or incurs as a result of

any governmental taxing authority assessing the Tuition Reimbursement hereunder as a benefit to the Employee.

7. Notices. Any notice required or permitted to be given under this Agreement shall be in writing, and may be given by personal delivery, e-mail or by mail, first-class postage prepaid. Notice shall be deemed given upon actual receipt in the case of personal delivery or e-mail, or within two (2) business days after mailing. Notices shall be sent to the addresses listed on the signature page of this Agreement.

8. No Waiver. The waiver or failure of either party to exercise, in any respect, any right provided in this Agreement shall not be deemed a waiver of any other right or remedy to which the party may be entitled.

9. Entirety of Agreement; Amendments and Modifications Only in Writing. The terms and conditions set forth herein constitute the entire agreement between the parties and supersede any communications or previous agreements with respect to the subject matter of this Agreement. There are no written or oral understandings directly or indirectly related to this Agreement that are not set forth herein. No change can be made to this Agreement other than in a writing signed by both parties.

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10. Governing Law; Venue. This Agreement shall be governed by and construed in accordance with the laws of the State of _____. Employer and Employee agree that any action to interpret or enforce this Agreement or which arises out of this Agreement shall be brought in the Superior Court of the State of _____, or, if applicable, in the United States Federal Court for the District of _____.

11. Attorneys' Fees. If Employer or Employee brings any legal action or seeks arbitration regarding the interpretation or enforcement of this Agreement, the prevailing party shall be entitled to recover its reasonable attorneys fees from the other party, in addition to any other relief that may be granted.

12. Headings in this Agreement. The headings in this Agreement are for convenience only, confirm no rights or obligations in either party, and do not alter any terms of this Agreement.

13. Severability. If any term of this Agreement is held by a court of competent jurisdiction to be invalid or unenforceable, then this Agreement, including all of the remaining terms, will remain in full force and effect as if such invalid or unenforceable term had never been included.

14. Successors and Assigns. This Agreement shall be binding on and shall inure to the benefit of the heirs, executors, administrators, successors, and assigns of Employer and Employee. Employer may assign any right or interest arising under this Agreement to any third party. This Agreement is not assignable by Employee.

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COMMUNITY IMPACT

We are committed to social and economic sustainability. We are award-winning with our community involvement, employee engagement and supporting/promoting education. Our employees spread the CPC culture outside the walls of our facilities. We do this with our involvement in over 30 programs within our communities.

- A dedicated community garden on our Wisconsin facility land planted
- Lakeview Technical Academy annual student tour
- Our local Fire and Police use our Illinois facility for their annual commercial building rescue training
- Local team sport sponsorships
- Charity team and fundraising events
- Walk for cancer
- Toys for Tots
- Local food collection
- Dragon boat races

We are committed to being a responsible corporate citizen through support for appropriate non-political and non-sectarian projects, organizations, and charities.

We recognize that our business activities have varying direct and indirect impacts on the societies in which we operate. We endeavor to manage these in a responsible manner, believing that sound and appropriate performance in this area is linked to business success. We are committed to reviewing and continuously improving our social responsibility program and encourage our business partners to implement corporate social responsibilities appropriate to their businesses.

Our businesses and suppliers throughout the world are committed to adherence to our policies. The stage and level of implementation varies according to business area and maturity of business.

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WHISTLEBLOWER

The purpose of this Whistleblower Policy is to create an ethical and open work environment, to ensure that Commercial Plastics has a governance and accountability structure that supports its mission, and to encourage employees to raise legitimate concerns about the occurrence of illegal or unethical activities within Commercial Plastics instead of turning to outside parties for resolution.

If employees have knowledge of, or a concern about illegal or dishonest fraudulent activity, they should contact their immediate manager or Human Resources. Employees must exercise sound judgment to avoid baseless allegations. If an employee in Human Resources is the subject of the whistleblower complaint, then speak with another member of senior management who will become responsible for investigating the incident.

Insofar as possible, employee's confidentiality will be maintained. However, an identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Commercial Plastics will not retaliate, nor permit retaliation against a whistleblower that brings forward a legitimate concern under this policy. This does not include immunity for any personal wrongdoing that is alleged and investigate.

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SUPPLY CHAIN

Commercial Plastics has operated with high ethical business standards and integrity in the communities where our employees work and live for more than 80 years. To preserve the trust placed in Commercial Plastics, the company counts on its network of suppliers and business providers across the globe to commit to and uphold its high standards of integrity, values, and operating principles.

It is Commercial Plastics' expectation that suppliers should be committed to upholding and supporting human rights of all workers; to treat them with dignity and respect; and to treat all workers equally. Our suppliers should safeguard worker's rights and we further expect that our suppliers will provide employees with a safe and healthy work environment; and observe and comply with all applicable laws and regulations.

Commercial Plastics is committed to ensuring our business is conducted in all respects according to rigorous ethical, professional, and legal standards. Our business partners must always adhere to the highest standard of ethical behavior. It is expected that our suppliers will operate every facet of their business with the highest degree of integrity, prohibit bribery and corruption; provide accurate information on products and services; respect intellectual property and confidential information received; prohibit any impediment to fair, transparent and free competition; and prohibit the granting of any improper advantage in the marketplace.

Commercial Plastics Ethical Trading Policy

Commercial Plastics regards suppliers as partners and works with them to help us achieve our policy aspirations in the delivery of our products and services. Specifically, Commercial Plastics is committed to working with its suppliers of products and services to ensure that the welfare of workers and labor conditions within our supply chain meet or exceed recognized standards.

Each Business Area is responsible for ensuring that all those affected by their supply chain are producing goods and services which adequately meet internationally recognized minimum requirements for worker welfare and conditions of employment. The minimum requirements are those defined by the International Fair Labor Organization (IFLO) or based on the Ethical Trading Initiative dependent on the business jurisdiction.

Each Business Area is responsible for implementing appropriate processes to assess supplier's compliance with the standards and monitor performance and improvements against the standards. Suppliers who are unable to meet all the requirements after an initial assessment/audit will be given

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the opportunity to fully comply within a period which is deemed appropriate for the circumstances. An action plan should be documented, and the supplier is expected to commit to addressing all the areas where discrepancies have been identified. The process of improvement via this method is principally down to the commitment of the supplier's management team and ownership to ensure that all areas are addressed. If Commercial Plastics has reason to believe that the supplier is not making sufficient or committed progress, then this could lead to a closure of the relationship until such time that Commercial Plastics is confident that all areas have been satisfactorily addressed.

Commercial Plastics reserves the right to cease a relationship with a supplier if it is subsequently found that unacceptable practices are being employed within any manufacturing sites used for Commercial Plastics products and components. These include use of child labor forced or bonded labor as well as physical abuse or discipline and extreme forms of intimidation.

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DATA PRIVACY AND CYBERSECURITY

Commercial Plastics provides computers, e-mail, and Internet access to assist employees in completing their work, improving their efficiency, and obtaining work-related data and technology. The following guidelines have been established to help ensure responsible and productive computer usage for data privacy and cybersecurity.

Computers (including the e-mail system, Internet access, computer files, and software furnished to employees) are the property of Commercial Plastics and are intended for business use. As a result, we reserve the right to monitor all use to which our equipment, networks, or resources may be put, regardless of whether the use is personal in nature, or occurs during non-working time for the privacy and protection. Our employees must comply with all potentially applicable laws each and every time you use Commercial Plastics computer networks, systems, or equipment for any purpose.

We strive to maintain a workplace free of harassment and sensitive to the diversity of our employees. Therefore, Commercial Plastics prohibits the use of computers, the Internet, and the e-mail system in ways that are disruptive, offensive to others, discriminatory, obscene, threatening, harassing, intimidating, or harmful to morale.

Copyrighted materials belonging to other entities may not be transmitted by employees on the company's network. All employees obtaining access to other companies' or individual's materials must respect all copyrights and may not copy, retrieve, modify or forward copyrighted materials, except with permission or as a single copy to reference only.

All Conduct Rules Apply – All Company rules on personal conduct apply to employee use of the email system. The internet is not to be used to communicate harassing messages, discriminatory messages, threatening messages, or messages with explicit content. The company internet cannot be used to reveal company trade secrets.

Professionalism – When using the Company's communication equipment, we are representing the Company. All messages should be professional, appropriate in tone and content. Our email is not a private conversation and can be printed, saved and forwarded.

Security – We avoid opening email attachments from people and businesses that we don't recognize. Particularly if the email appears to have been forwarded multiple times or has a nonexistent or peculiar subject heading.

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CONFIDENTIALITY & NON-DISCLOSURE

The protection of confidential business information and trade secrets is vital to Commercial Plastics interests and success. Such confidential information includes, but is not limited to, the following examples:

- Automation
- Contractual relationships
- Customer data and information
- Customer lists
- Customer preferences
- Designs
- Manufacturing processes and procedures
- Methods and protocols
- New materials research
- Patents
- Pending projects and proposals
- Pricing lists/Cost models
- Product design information
- Proprietary production processes
- Raw material specifications
- Research and development strategies
- Sample and sample plans
- Specifications
- Technological prototypes
- Trade secrets

This and other information have actual and/or potential independent economic value, especially for our customers, and is subject to our reasonable effort to maintain its confidentiality. Many of our customers require Commercial Plastics to enter into confidentiality agreements. As such, confidential information provided or disclosed to you is intended to remain confidential and protected from disclosure until we specifically declare such information to be no longer confidential. This does not apply to information that is public knowledge provided it becomes public knowledge through other sources.

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ANTI-CORRUPTION

ANTI-CORRUPTION POLICY

Commercial Plastics' policy is to always comply with relevant laws and regulations in the countries where we are active. We choose business partners who apply principles in ethical, social and environment related issues like those we apply. Commercial Plastics expects the partners who have chosen to collaborate with us to adhere to the values expressed in our business code. Commercial Plastics' employees may not accept bribes, engage in bribery, or participate in any form of corrupt business activity. We also do not give or accept gifts with more than a symbolic value or participate in activities that could affect our objectivity in business decisions.

Commercial Plastics Code of Conduct

This anti-corruption policy (the "Policy") sets out Commercial Plastics' rules regarding anti-corruption. The Policy supplements and expands on the Commercial Plastics Code of Conduct. Where a law conflicts with this Policy or the Code of Conduct, the more stringent measure shall be adhered to. Failure to comply with anti-corruption laws and regulations can have very serious consequences for Commercial Plastics and its employees, such as very large fines, immeasurable damage to reputation and even criminal sanctions such as imprisonment and fines.

Consequently, Commercial Plastics' employees and business partners must take great care in exercising good judgement and never put themselves or others into a position which may violate this Policy or applicable anti-corruption laws. It is never in the interest of Commercial Plastics to violate this Policy or any applicable anti-corruption laws. Any participation in a violation of this Policy or applicable law will be grounds for disciplinary action up to and including termination of employment.

Prohibition against bribery

No employee of Commercial Plastics shall offer, provide, authorize, request, accept or receive a "bribe", either directly or indirectly. No employee of Commercial Plastics shall perform his/her functions improperly in anticipation of, or because of a bribe. A "bribe" means an improper benefit, whether a financial benefit or other advantage, if the purpose of the benefit is to encourage improper performance or misuse of a person's position, regardless of whether that person has an assignment in the public or the private sector.

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A bribe can take many forms and shapes. A bribe can for example be (but is not limited to):

- Cash or other forms of payment to a person to secure a contract or obtain a permit/license
- Gifts or entertainment intended to unduly influence the recipient to take a particular action
- Payment of travel expenses/accommodation for a customer when there is no underlying business purpose for a trip

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BUSINESS CONTINUITY MANAGEMENT

Business Continuity Planning Statement

Our Business Continuity Plan has been constructed with the objective of creating a plan for Commercial Plastics to follow in the event of a major incident, which seriously affects the ability of the company to service its customers. The nature of any incident and the severity of the restrictions placed on the Company's operation cannot be known in advance. Rapid assessment of the situation and the taking of appropriate contingency actions are vital to limit disruption in the interests of both the Company and its customers.

An Incident Team will be formed to coordinate the response to any incident. If the incident occurs during a workday, the Incident Team shall assemble in the Main Conference Room. Team members who are absent should be contacted, if necessary. If the incident occurs outside normal business hours, the team will convene via conference call.

The initial role of the Incident Team shall be as follows:

- Determine the extent of the incident.
- Launch an investigation into the cause of the incident.
- Contact Ownership and the CFO to alert the insurers.
- Determine the best means of communication.
- Activate the Disaster Recovery procedure if necessary.
- Assess the expected time lapse prior to restoring the ability of the Company to do business.

Based on the above action and information, the Incident Team can start to assess the impact of the incident and to start a plan of action to meet the Company's needs.

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In planning for potential significant business disruptions, Commercial Plastics has considered several outcomes from varying scenarios, including, as examples only, a disruption to a single building, a city-wide business disruption and a regional disruption. These plans intend to permit the continuation of key business operations during most types of disruptions by resuming mission-critical operations, usually within the same business day as the disruption. To assist this business continuity, we back up capabilities in alternative locations. Our business continuity plans are subject to modification, and updated summaries of the plans will be promptly where necessary.

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QUALITY

QUALITY POLICY

Commercial Plastics is firmly committed to meeting or exceeding our customers' expectations through a comprehensive approach of continuous quality improvement and manufacturing techniques.

Quality Objectives

Performance measurements in place must align with the Quality Policy. The Key Performance Indicators include goals that are directed towards enhancing customer satisfaction and overall continuous improvement at Commercial Plastics. Our Three Objectives: Meeting our customer's satisfactory score, EcoVadis overall good score, and reduce operational risk.

Environmental, Health and Safety Policy

It is the policy (Code of Conduct) of C.P. to protect the health and safety of our employees, customers, and the public, and to conduct all activities in an environmentally responsible safe manner. We commit to this policy worldwide as an integral part of being a world class plastic injection molding company. Corporate management has ensured alignment of C.P.'s worldwide business strategy and operations with this Environmental, Health and Safety (EHS) policy and is firmly committed to:

- The EcoVadis Corporate Social Responsibility (CSR) rating methodology to measure the quality of C.P.'s CSR management system through our policies, actions, and results. Based on the EcoVadis 7 founding principles.
- Conduct global operations in accordance with all applicable laws, regulations, and other requirements, anticipate EHS issues and promote appropriate voluntary initiatives that support this policy.
- Strive for an injury free workplace through high employee involvement and a strong health and safety program.
- Strive to continuously improve global EHS performance by utilizing practices that protect employees and the environment, including developing opportunities for recycling internal and external packaging and raw resins, improving energy efficiency and promote a healthy campus.
- Minimize the EHS impact to our employees, facilities, and communities in which we do business.
- Train and motivate employees to conduct their activities in a safe and environmentally responsible manner; and
- Review and report to the Operations Management on a periodic basis the EHS performance of the global operations which may include the setting and review of EHS objectives and targets used to promote continuous improvement.

Furthermore, C.P. has undertaken the responsibility to earn public trust by communicating about our policies, programs, and performance, and by advocating sound laws and regulations. Corporate management has overall responsibility for endorsing the policies adopted regarding EHS. Corporate management reviews this policy during Management Review meetings.

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CONFLICT MINERALS

Commercial Plastics is committed to sourcing components and materials from companies that share our values around human rights, ethics, and environmental responsibility. We expect our raw material suppliers to abide by requirements of the Fair Labor Standards Act, which prohibits human rights abuses and unethical practices. We also require all suppliers to comply with applicable legal standards and requirements.

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum, and gold, or "3TG") originating in the Democratic Republic of the Congo.

Commercial Plastics supports the humanitarian goal of ending the violence and human rights violations in the DRC, which are believed to have been partially financed by the exploitation and trade of conflict minerals. Commercial Plastics strives to have a conflict-free supply chain and is committed to working with its customers and suppliers to increase transparency regarding the origin of minerals contained in its products. Commercial Plastics requires its suppliers to undertake reasonable due diligence with their suppliers to identify whether any of the products supplied to Commercial Plastics contain 3TGs sourced from the DRC and, if so, whether the mines and smelters identified are certified as "conflict free" by an independent third party.

Commercial Plastics is also committed to complying with all the conflict mineral requirements under the Act and all the rules and regulations issued by the SEC. We requires our raw material suppliers to provide us with completed conflict minerals declarations upon request.

We may reconsider our willingness to partner with suppliers that fail to comply with this Policy.

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PRODUCT CIRCULARITY

Commercial Plastics provides solutions for our customers to minimize the end product's impact on the environment. During the whole life of the product, from design to end-of-life, we help to enhance the environmental sustainability of our customer's products. Where possible, we choose new renewable materials to lower the CO₂ impact of our solutions with recycled, reprocessed, BIO and renewable materials. We also help develop solutions for light weighting products with innovative design, iMFLUX technology, and construction solutions that allows us to reduce the reliance on virgin material as well as logistics impacts. With new technologies we can make stronger products using less material.

Our raw material suppliers are using circular intelligence to pave the way to climate neutrality - through materials and technologies. With their help, carbon stays in the system and fossil resources become more and more obsolete:

- Currently, those materials consist of at least 25% alternative, non-fossil raw materials.
- Technologies within these programs also prove that closed cycles are already possible today.

By partnering with our customers to design in product circularity many of our customers now have goals of 95% of the materials in their products will be recyclable by 2030.

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CUSTOMER HEALTH and SAFETY

At Commercial Plastics, safety and well-being is built on a simple principal; create a culture of safety and health not only for our employees, but for our customers as well. As a contract manufacturer we take additional steps to ensure that the products we produce not only meet or exceed the requirements of federal safety laws, but also are designed and manufactured as safely as possible.

Commercial Plastics' strong commitment to product safety goes well beyond stating its compliance with the federal, state, and local regulations and consumers. Safety is very important to us and our customers, and we are committed to manufacturing our customer's products with 100% compliance.

To achieve compliance for customer health & safety Commercial Plastics is committed to:

- Practice safety by design
- Build safety in our supply chain
- Be knowledgeable and aware of the business and regulatory environment
- Being prepared for recalls as needed
- Document our work to always show compliance
- Challenge our customers and ourselves to manufacture the safest possible consumer products

Each Business Area is responsible for identifying health and safety risks associated with its activities, and for developing, implementing, and maintaining management systems and working practices leading to continual improvement in our safety performance. Business Leaders are responsible for establishing safety objectives and monitoring safety performance within their own Business Areas. This will include auditing with an associated program of risk improvements.

Review

An annual review of this Policy will take place to take advantage of new business practices, technology and to ensure compliance with new laws as a minimum requirement, which should also be reviewed to determine its continued relevance, appropriateness, and effectiveness.

Safety Meetings

Employee Commitment, Involvement & Views: Safety meetings will be open to all, to ensure formal recording of Employee and Management commitment and involvement.

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Audits

Commercial Plastics will undertake independent Health & Safety Audits at least annually.

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- Strive to continuously improve global EHS performance by utilizing practices that protect employees and the environment, including developing opportunities for recycling internal and external packaging and raw resins, improving energy efficiency and promote a healthy campus.
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