

Trenton Pressing, LLC

Code of Conduct & Corporate Responsibility Policy

Ethics Policy

Trenton Pressing is committed to conducting our business ethically, legally and in a manner that is environmentally and socially responsible. We believe that demonstrating our commitment to top management responsibility is integral to creating long-term employee, customer and shareholder value. Operating responsibly is both a core value and a common goal of Trenton Pressing's leadership and staff.

This Policy articulates Trenton Pressing's commitment to responsible development where our employees, contractors and managers are empowered and expected to comply with the requirements of this Policy. This Policy encompasses the areas of governance, people, the environment, safety and engagement.

Governance

Trenton Pressing will:

- Maintain high standards of integrity with employees at all levels of the company.
- Comply with and where possible, exceed legal requirements and industry standards applicable to our activities
- Conduct business in an open, honest and ethical manner
- Integrate top management responsibility in our business planning and decision-making processes

People

Trenton Pressing will:

- Provide a respectful, inclusive workplace free from harassment, discrimination, violence and intimidation.

Trenton Pressing does not discriminate on the basis of gender, race, color, age, national origin, religion, disability, sexual orientation, marital status or any other characteristic protected by applicable laws.

- Apply fair labor practices in accordance with national and local laws **with child labor and/or forced labor being prohibited.**
- Commit to investing in our employees by providing development opportunities which are aligned to individual and company needs.
- Establish reasonable standards of performance and supply the necessary tools and resources to enable our staff to meet or exceed expectations.
- Maintain a positive and consistent approach in managing and improving employee performance and intervene when unacceptable behavior and / or performance occurs.
- Respond to employee needs through proactive engagement.
- Respect employee privacy and only access personal information for legitimate business purposes. Employee personal information will be securely stored, and any possible privacy breaches or security risks reported to top management and designated authorities.

Wages & Hours

Trenton Pressing is committed to following all applicable wage and hour laws and regulations. To help ensure that all work performed is compensated fully and correctly. All hourly employees must accurately record their time worked (clocking in/out or notifying their supervisor) whether it is scheduled or unscheduled, overtime or straight time, authorized or unauthorized.

Freedom of Association and Collective Bargaining

In the event there is ever concern, Trenton Pressing employees are allowed to use their collective power to approach management in order to achieve improved labor rights, improved workplace health & safety, maintain the right not to be discriminated against and to have the freedom from forced labor.

Environment

Trenton Pressing will conduct business in a manner that is environmentally responsible as outlined in the Environmental Policy. The company will review its significant aspects annually and monitor as applicable its air quality/emissions, energy consumption, natural resource usage, waste generation and/or water consumption for the purpose of identifying areas where reduction efforts can be implemented. The company will ensure responsible chemical management to prevent accidental misuse and the potential for spills to occur.

Health and Safety

Trenton Pressing strives to provide a safe and healthy workplace for its employees. To ensure our work environments stay safe, it is important for employees to always wear the required PPE provided for the job they are doing and to follow all safety procedures in place for the operation of machines/equipment and when lifting/transporting heavy objects. Our philosophy is that every accident is preventable. All employees should be aware of their surroundings and are encouraged that if they see something, to say something.

Engagement

Trenton Pressing will:

- Engage and work with stakeholders in a timely, respectful and meaningful manner in our planning and operations. We value the input of our stakeholders and, where appropriate, incorporate their feedback in our ongoing operations.
- Provide ample opportunity for face-to-face feedback at all levels of the company per our open-door policy

Whistleblower Policy

A whistleblower as defined by this policy is an employee of Trenton Pressing who reports an activity that he or she considers to be illegal or dishonest to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures. Appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing

for services not performed or for goods not delivered; and other fraudulent financial reporting. If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee must contact his or her immediate supervisor or the Human Resources manager. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas - confidentiality and against retaliation.

- To the extent possible, the confidentiality of the whistleblower will be maintained. However, 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.
- Trenton Pressing will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. All reports of illegal and dishonest activities will be promptly submitted to the Plant Manager who is responsible for investigating and coordinating corrective action. Employees with any questions regarding this policy should contact the Human Resources manager.

Anti-Bribery Policy

It is our policy to conduct our business in an honest and ethical manner. Trenton Pressing takes a zero-tolerance approach to Bribery and Corruption and is committed to acting professionally, fairly and with integrity in all our business activities.

Gifts, Invitations & Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from Third Parties.

An employee is prohibited from accepting a gift or giving a gift to a third party in the following situations:

- It is made with the intention of influencing a Third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits
- It is given in your name and not in the name of the company
- It includes cash
- It is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process)
- It is given secretly and not openly.

Trenton Pressing appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

Employee Responsibilities

Employees must act in the best interest of Trenton Pressing. It is not acceptable for an employee (or someone on your behalf) to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer a payment, gift or hospitality to a Public Official or Third Party to ‘facilitate’ or expedite a routine procedure.
- Accept payment from a Third Party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
- Accept a gift or hospitality from a Third Party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- Threaten or retaliate against another Employee who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy or perceived breach of this policy.

It is the employee’s responsibility to:

- Ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept ‘off-book’.
- Declare and keep a written record of all Gifts, Invitations & Hospitality according to company practice accepted or offered, which will be subject to managerial review.

Conflicts of Interest

A conflict of interest may arise when an employee is influenced, or appears to be influenced, by considerations of personal gain or benefit for themselves or a family member in a manner that conflicts with the employee’s obligation to Trenton Pressing. Some examples include, but are not limited to the following:

- Being an employee, owner or financial investor in a business that competes or transacts with Trenton Pressing.
- Being the hiring manager for a position for which a relative is being considered.
- Being in a direct reporting relationship with a co-worker with whom you have a romantic relationship with.
- Working as a consultant on your own time for a company that competes or contracts with Trenton Pressing.
- Awarding a contract or doing business with a company owned by a relative.

Fair Competition

Anti-trust laws are designed to ensure that competition remains vigorous and free from collusion. Employees must never discuss pricing or strategies with competitors. Employees must never agree to fix prices, coordinate bids allocate markets or allocate customers.

Intellectual Property

Trenton Pressing’s intellectual property is an invaluable asset and must be vigorously protected. Intellectual property can include brands, copyrights, inventions, patents and/or trademarks. It also includes employee work performed and anything created by them in connection with their job duties or the use of company time, resources, and information. This intellectual property belongs to Trenton Pressing and must only be used for the purpose of conducting company

business. If an employee leaves the company, all company property must remain with or be returned to the company.

Suppliers

Trenton Pressing selects suppliers based on merit, quality of service and reputation. We hold our suppliers to the same high standards of integrity to which we hold ourselves.

All suppliers are expected to comply with Trenton Pressing's Code of Conduct & Corporate Responsibility Policy and adhere to our principles of responsible global sourcing.