

Code of Conduct

CGR Products





Associates at CGR Products are empowered and encouraged to take the initiative, make decisions, and drive our business forward through mutual respect, best business practices, and support of our corporate initiatives, the North Bound Train.

The Code of Conduct is a tool to help all associates navigate what is right in a particular situation and act in a way that manages legal, ethical, and moral risk.

A handwritten signature in black ink, which appears to read 'Charles Keeley III'. The signature is fluid and cursive, with a horizontal line at the end.

Charles Keeley III
President of CGR Products, Inc
Adopted October 1, 2020

Table of Contents

Why do we have a Code?	4
Key Principles	5
A Foundation of Respect	6
Mutual Respect	7
Non-discrimination:	7
Safe and Healthy Workplace	8
Minimizing health and safety risks	9
Environmental compliance.....	9
What are hazardous materials or dangerous parts?	10
Working hours and compensation	10
Modern slavery and child labor	10
Business Dealings are Fair and Lawful	11
Product compliance	12
Fair competition	12
Anti-corruption, including gifts and entertainment	13
Anti-money laundering.....	13
We Separate Personal and Business Interests	14
Conflicts of interest.....	14
Political activities	15
We Protect Company Information and Assets	16
Confidential information	16
Intellectual property	17
Physical and financial assets	17
Data privacy	17
Accounting and reporting.....	18
We Communicate Transparently and Responsibly	19
Speak Up!	19

Why do we have a Code?

We want to do what is right in all our business dealings and have fun doing it.

*Are you a manager, supervisor, or lead person?
Live our values and the Code. Set an example by your behavior, active continuous improvement, and the support you give others.*



Key Principles

Does the Code apply to everyone at CGR?

Yes, and failing to do so you may be disciplined, including the risk of losing your job, or even facing criminal charges. The company may be fined, face lawsuits, suffer damage to its reputation and/or profit loss.



What if I do not find the answers in the Code?

The Code contains rules and principles for how we do business. It cannot describe every situation and the right answer may not be obvious. If you are ever in doubt about a course of action, ask yourself:

-
- ◆ *Is it against the law, unethical or immoral?*
 - ◆ *Could it damage CGR's reputation?*
 - ◆ *Would I be embarrassed to read about it in the media?*
-

If you answered yes to any of these questions, stop and consult your manager who can help you find a way to handle the situation.



WHAT IF THERE IS A CONFLICT BETWEEN THE CODE AND LOCAL LAW?

We want to conduct all our business in compliance with the Code; however, nothing in this Code should be understood as an instruction to break the law.

A Foundation of Respect



Mutual Respect



At CGR, we are proud of our inclusive work culture, which encourages support for one another, intentional individual growth, and strong teams. Unwelcome conduct that creates an intimidating, offensive or hostile work environment is not the norm and is not tolerated. Instead, we encourage and expect mutual respect among associates and between our company and our business partners.

For you, this means:

- ◆ Treat all individuals with respect.
- ◆ Never bully, intimidate, or threaten another person.
- ◆ Avoid behavior that someone else could reasonably find offensive.
- ◆ Object to harassment or other inappropriate conduct, whether it is targeted at you or someone else.
- ◆ Avoid wearing offensive, controversial, or insensitive clothing.

Harassment is:

Any conduct or comment which creates, encourages, or permits an offensive or intimidating work environment. This includes verbal or physical harassment, bullying, sexual harassment, power harassment, racism, inappropriate humor, or other actions that offend or cause distress.

Non-discrimination:

CGR values a diverse workforce and expects hiring managers to observe applicable laws against discrimination. Employment decisions like hiring, pay, title, promotion, discipline, termination, or working conditions should be based on a person's ability and /or performance.



Do not practice discrimination; instead,

- ◆ Evaluate candidates based on talent, skill, and experience.
- ◆ Speak up if you see discrimination or believe you have been unfairly discriminated against.

Discrimination is:

Discrimination happens when qualified individuals are penalized at work due to unrelated personal factors like:

- ◆ Gender, gender identity, or expression
- ◆ Age
- ◆ Nationality, race, ethnicity, skin color, or cultural background
- ◆ Religion or beliefs
- ◆ Disability, genetics, or health information, including pregnancy
- ◆ Sexual orientation

Safe and Healthy Workplace



We believe accidents, incidents, injuries, near misses, work-related illnesses, and unsafe conditions are often preventable.

For You, This Means:

- ◆ Take responsibility for your own safety and the safety of others around you.
- ◆ Correct or report hazards and address any unsafe behavior.
- ◆ Know and follow all safety requirements, including the use of personal protective equipment.
- ◆ Never take shortcuts or ignore required safety practices.
- ◆ If you are a manager, ensure employees are properly trained and equipped for their jobs.
- ◆ Do not use or possess illegal drugs at work or at home.
- ◆ Do not work while intoxicated or under the influence of drugs or alcohol.

Minimizing health and safety risks

- ◆ Reduces work interruptions caused by safety incidents or accidents.
- ◆ Drives trust, engagement, and performance by allowing employees to focus on their jobs, without worry for their well-being.

Environmental compliance

At CGR, we ensure our business operations are following environmental laws and company requirements.



For You, This Means:

- ◆ Follow all environmental laws and company requirements.
- ◆ Take all required precautions when handling or transporting hazardous materials or waste, including during loading, unloading, or storage.
- ◆ Use and dispose of chemicals and other materials properly, and report any spills, discharges, or environmental concerns.

What are hazardous materials or dangerous parts?



For purposes of this Code, we mean any chemicals, materials, or waste that could present health risks or are corrosive, flammable, or explosive.



This includes aerosols, gasoline, diesel, hydraulic fluid and certain paints, solvents, adhesives, or surface treatments.

Working hours and compensation

CGR complies with applicable laws and agreements on working and resting hours and compensation and benefits.

For You, This Means:

- ◆ The terms and conditions of your employment, including your rights and your obligations, should be made clear to you.
- ◆ Your working time should not extend beyond any allowed maximum, and you should receive time off for proper rest and paid holidays or vacations.
- ◆ Your terms of employment and compensation should meet applicable minimum wages and other legal requirements.



Modern slavery and child labor

CGR does not tolerate any forms of modern slavery, including forced, bonded, or compulsory labor, or human trafficking. We do not use child labor.

For You, This Means:

- ◆ If you hire, observe the appropriate minimum employment age in your state and employees are free to leave under their terms of employment and law.

What is Modern Slavery?

Human trafficking involves recruiting, harboring, or transporting people into a situation of exploitation using violence, deception or coercion and forcing them to work against their will. Forced labor is any work or service that people are forced to do against their will, under threat of punishment and for which the person did not volunteer.

What are examples of signs to look out for?

- ◆ Confiscation of identity papers, passports, or education certificates.
 - ◆ Withholding wages.
 - ◆ Lack of official employment status.
 - ◆ Abusive working conditions.
 - ◆ Physical and sexual violence.
 - ◆ Debt bondage, i.e. loans that must be repaid before the employee can end his/her contract.
 - ◆ Recruitment fees, i.e. a person has paid a recruitment firm for the job and must work until the debt is repaid.
 - ◆ Restrictions of movement, e.g. employees not allowed to leave company premises.
-

Business Dealings are Fair and Lawful



Product compliance

CGR's products are manufactured, marketed, and sold to comply with applicable legal requirements and our internal quality and safety standards. Compliance is essential to build trust in our products leading to success for us and for our customers.

For You, This Means:

- ◆ Do not tamper with tests or test results.
- ◆ Do not take shortcuts or make decisions that compromise product compliance – regardless of the likelihood of detection.
- ◆ Present our products and services accurately.



Fair competition

We trust that our products and services will succeed in a competitive marketplace and that a fair market benefits us.

We compete on the merit of our craftsmanship and experience to provide products and services engineered and requested from our customers.

We do not take actions that are illegal under the competition laws, such as colluding with competitors.

We treat our suppliers in a professional manner and choose suppliers based on objective criteria.

For You, This Means:

- ◆ Use only legitimate methods to gather information about competitors.
- ◆ Do not agree with a competitor on important issues like price fixing, market sharing, or customer allocation.
- ◆ Do not, on your own, decide to exchange commercially sensitive information with competitors.

What is commercially sensitive information?

It includes:

- ◆ Prices, surcharges, costs, margins, or discounts
- ◆ Terms of sale or profitability

- ◆ Distribution, business plans, aftermarket strategies, market forecasts, or product development plans

Sharing, receiving, or exchanging this type of information could be prohibited even when it is informal, such as in conversation with a former associate or friend who now works for a competitor.

Anti-corruption, including gifts and entertainment

CGR does not participate in or endorse any corrupt practices, including offering or accepting kickbacks, bribes, excessive gifts, or hospitality. We will not accept bribes from suppliers, vendors or partners, and we will take necessary action if such actions are uncovered.



For You, This Means:

- ◆ Do not give or accept bribes or anything that could be considered a bribe, including cash, gift cards or other cash equivalents, job opportunities, favors, travel, promises to pay debts, or unlawful gifts and entertainment.
- ◆ Never accept anything from a supplier, business partner, or anyone else if it might affect or appear to affect your ability to be objective in your business decisions.
- ◆ If a supplier or business partner offers you inappropriate gifts and entertainment, please raise the issue with your manager.

Anti-money laundering

Money laundering allows criminals and others to disguise the source of funds obtained illegally. These funds may come from or support activities like human trafficking, drug trafficking, terrorism, blackmail, or fraud. CGR does not facilitate or support money laundering.

For You, This Means:

- ◆ Know your customer, understand the terms of all transactions, and be alert for signs of money laundering.
- ◆ Report any suspicious transactions to the company, including third party payments, large cash purchases, or the use of cash equivalents.

We Separate Personal and Business Interests



Conflicts of interest

Associates at CGR have an obligation to work in the best interests of the company, and to avoid or disclose situations where our private, financial, or other external interests conflict with our job responsibilities. In some cases, just the appearance of a conflict may damage our reputation or effectiveness.

For You, This Means:

- ◆ Understand how to recognize conflicts of interest. If you face a conflict, disclose it to your manager for resolution.
- ◆ Make business decisions in the company's interests, and not to benefit yourself or your family. Potential conflicts that require disclosure can include:
 - A close relationship with someone you supervise or might hire
 - Running a side business that does business with CGR

- Taking a side job with a supplier, other business partner, or competitor, especially if you work full-time at CGR

Avoiding conflicts of interest...

- ◆ Drives performance by ensuring that we make decisions in the best interests of our customers and the business
- ◆ Drives trust in our business by demonstrating that we are an honest and reliable partner
- ◆ Supports profitability and effectiveness by ensuring we choose the suppliers and vendors who offer the greatest value

Are you a manager?

You should contact HR for support in evaluating or handling any conflicts of interest that are disclosed to you.

Political activities

CGR will observe neutrality regarding political parties and candidates for public office. Neither the names nor the assets of CGR companies shall be used to promote the interests of political parties or candidates for public office.

For You, This Means:

- ◆ You may support causes of your choice, but do not make political or charitable contributions using company funds or in the company's name.
- ◆ You may contribute your own time and resources, but do not use working time, property, or any other company resources to promote your personal political interests.



We Protect Company Information and Assets



Confidential information

We all have an obligation to protect information CGR considers confidential. This includes any non-public information about our processes, products, innovation, and financial or strategic plans or position.

For You, This Means:

- ◆ Make sure you are authorized and have a proper business purpose before disclosing confidential information to anyone outside the company.
- ◆ Never post company confidential information on social media.
- ◆ Protect the confidential information that suppliers, business partners, and others share with us.
- ◆ Your obligation to protect confidential information may continue also after you have left the company.
- ◆ Do not give out information by phone or email in response to unexpected requests, including employee information, home addresses, phone numbers, or travel plans.

Intellectual property

CGR's intellectual property – such as technical inventions, patents, copyrights, know-how, trade secrets, design, and trademarks and related licenses – are highly valuable assets, but that value can be lost or compromised if these are misused or inappropriately disclosed. CGR will take action to defend its intellectual property and is committed to respecting intellectual property that belongs to others.



For You, This Means:

- ◆ Carefully protect any CGR trade secrets, inventions, or designs and do not publish or disclose them unless you have been specifically authorized to do so.
- ◆ Respect and do not use material protected by intellectual property that belongs to others without CGR management approval and third-party permission.
- ◆ Report any suspected or alleged unpermitted use of intellectual property of CGR or of a third party in line with CGR directives.

Physical and financial assets

CGR's assets, including financial assets, physical property, and company devices, systems, and networks, are critical to our ongoing productivity and business success. We must use these assets responsibly and protect them from theft, carelessness, and waste, whether that means protecting access to company buildings, equipment, and tools or using good judgment when spending company funds.

For You, This Means:

- ◆ Do not use company assets, like equipment or funds, to personally benefit yourself or someone else.
- ◆ Comply with local expense report procedures and instructions, and do not claim private expenses as business expenses.
- ◆ Report any theft or misuse of company inventory, cash, equipment, supplies, or other assets.

Data privacy

When we are entrusted with personal information about individuals, we safeguard it and take appropriate steps to protect it from misuse. We observe all applicable privacy laws when we collect, use, and share personal information about individuals.

For You, This Means:

- ◆ Follow company guidelines when collecting, storing, using, or sharing personal information about individuals.
- ◆ Do not access personal information stored on our systems, except for business purposes in which you are given management permission.

Accounting and reporting



We want to report in a transparent, truthful, and timely manner to convey a true view of the CGR's performance through our KPI information. We report financial transactions in accordance with generally accepted accounting practices.

For You, This Means:

- ◆ Be honest and accurate when you report or record information about our business.
- ◆ If you submit or approve expenses, ensure they accurately reflect the transaction and comply with company policies and procedures.
- ◆ Never misstate facts when recording a transaction or enter information that you know is incorrect.
- ◆ If you notice an error in a financial record, or suspect fraud has occurred, report it immediately.

Reporting honestly and accurately...

- ◆ Drives performance by ensuring that senior management is making decisions based on accurate and up-to-date information
- ◆ Builds trust by demonstrating to the market that we are honest and reliable
- ◆ Protects against fraud and ensures that CGR funds are being used in support of the company's strategic interests

We Communicate Transparently and Responsibly



Speak Up!

If you know about something that does not seem right, or which violates this Code of Conduct, we want you to speak up. Often, early reporting can help resolve an issue quickly and minimize harm.

How do I raise a concern?

To express a concern, you can:

- ◆ Talk to your manager, or your manager's manager.
- ◆ Talk to a relevant functional group, like HR, Finance, or Legal & Compliance.
- ◆ Write a letter to the head of Corporate Audit, at:
CGR Products
c/o HR Dept.
US Hwy 29 North
Greensboro, NC 27405

Can I report anonymously?

Yes, if anonymous reports are permitted by local law. However, we encourage you to identify yourself when making a complaint. This allows the company to obtain all facts, properly

investigate your report, and enter a confidential dialogue with you. Even if you identify yourself, every effort will be made to keep your identity strictly confidential within the company.

What happens after I raise a concern?

Once you make a report, CGR will investigate the situation and take appropriate actions. If you raise a concern in good faith, CGR will not tolerate any retaliation against you. This is true regardless of the outcome of the investigation.

