

GLR Policy – Code of Ethics and Business Conduct

This policy highlights important standards that are consistent with Great Lakes Rubbers' values and applies to people and companies that do business for Great Lakes Rubber. We expect our employees will not only meet their contractual obligations, but will comply with laws, regulations, and conduct themselves consistent with our Guiding Principles and Code of Ethics and Business Conduct.

Fair Treatment of Employees

We observe the fundamental rights of our employees based on the applicable national labor laws. The following rules are aligned with the International Labor Organization's (ILO), Declaration on Fundamental Principles and Rights at Work.

Respecting Human Rights

We expect employees of Great Lakes Rubber to conduct their business in a manner that respects the human rights and dignity of all, and support international efforts to promote and protect human rights, including an absolute opposition to slavery, human trafficking, and forced labor.

Child Labor

We shall only employ persons who have reached the minimum legal age for work according to the laws applicable in the country of employment. Moreover, we respect and uphold children's rights.

Freedom of Association

We respect freedom of association and obey all laws on working hours and compensation. We shall grant our employees the right to articulate their interests within the framework of the labor laws in force in our country.

Equal Opportunities

We do not tolerate discrimination based on characteristics such as a person's race, color, gender, national origin, age, religion, disability, marital status or sexual orientation.

Fair Working Conditions

We shall pay wages and social benefits equal to or higher than the rates prescribed by national or regional laws and regulations, authorities, legal standards, or other labor agreements. The applicable regulations governing working hours and vacation entitlements shall be observed.

Occupational Health and Safety

At the minimum, we shall comply with national standards of workplace safety and hygiene and take appropriate measures to ensure that the relevant occupational health and safety requirements are met, in order to ensure safe and healthy working conditions.

Respecting the Individual

We provide each individual the opportunity to achieve the goals they desire. Within the "Group System" everyone has an opportunity to actively participate in establishing group norms and objectives and accept responsibility for the groups' requirements.

Conduct in Business Environment

Maintaining Data Integrity

At Great lakes Rubber, we have a responsibility to ensure our products are manufactured, tested and suitable for use based on data that is accurate, reliable, and complete. Product quality is our highest priority, and data integrity is a fundamental aspect of our company's Quality Management System.

We expect to adhere to sound data integrity principles to ensure that data and records are attributable, legible, truthful, original, and accurate. We expect to refrain from any conduct that calls into question the integrity of data provided including data falsification, making unauthorized changes or substitutions to data, destroying, deleting, or overwriting data and to report any issue that impacts the integrity of our data (for example, errors, omissions, or international data manipulation). We must familiarize ourselves with the Company's data integrity policies and adhere to the following Data Integrity Principles

Data Integrity Principles

- We are responsible for ensuring test data is
 - Attributable, legible, truthful, and accurate and
 - Generated and acquired, recorded, reported, retained and disposed of in accordance with applicable law and our standards
- We shall create and maintain attributable, legible, complete, consistent and accurate records of all tests, data values and data analyses and will not engage in any form of testing or data manipulation, including but not limited to the following:
 - Intentionally report data values that are not the actual values obtained;
 - Intentionally report the dates and times of data analyses that are not the actual dates and times of the data analyses; or
 - Intentionally omit data values (in whole or in part) in reports.
- We will appropriately communicate these data integrity principles to and will ensure compliance with these data integrity principles to all of our employees and contract workers which fulfill our contractual obligations

Confidentiality

Our business is based upon protecting Great Lakes Rubbers' and our customers' intellectual property. We will retain all Great Lakes Rubber and customer information in a manner to protect its confidential integrity

Prohibition of Corruption and Bribery

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. We do not pay or accept bribes, kickback, or facilitation payments, at any time for any reason.

We will comply with all applicable anticorruption laws and ensure compliance with all United Nations (UN) and Organization for Economic Co-operation and Development (OECD) conventions against corruption. In particular, we are expected to ensure our employees, subcontractors and agents do not offer, promise or grant any advantages to any Great Lakes Rubber employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

Invitations and Gifts

We do not accept or provide gifts, favors, or entertainment even if complies with our policies if the intent is to improperly influence any decision. We will refrain from presenting any invitations or gifts to our employees to gain any form of influence.

Any invitations or gifts extended to Great Lakes Rubber employees or related parties, if any, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value, comply with applicable laws and regulations, and reflect ordinary local business customs. We also will refrain from asking our employees or related parties for any inappropriate advantages.

Preventing Conflicts of Interest

In business dealings with us, we will make decisions based on objective criteria only. We shall not at any time consider any factors that might influence our decisions due to private, business or other conflicting interests, including but not limited to the interests of relatives and other related parties.

Unrestricted Competition

We believe in free and open competition and never engage in inappropriate practices that may limit competition. We will always compete in a fair manner and comply with applicable antitrust laws and regulations. We are expected not to enter with competitors into agreements that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

Money Laundering

We comply with all applicable laws and regulations governing the prevention of money laundering and not to participate in any money laundering activities.

Conflict Minerals

We adhere to all applicable conflict minerals laws and regulations. If a product contains one or more of the conflict minerals (tin, tantalum, tungsten and gold or their ores) as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act or similar legislation we will be transparent on the supply chain up to the smelter, including all certifications and information relating to Conflict Minerals, as defined in the Act or other laws or regulations, in such form and at such time as requested by our customers.

Reporting Integrity and Compliance Issues

We will provide an adequate mechanism for our employees to report integrity or compliance issues, quality, and product safety issues without fear of retaliation. We will have procedures in place to appropriately review and investigate reports and take corrective action if necessary.

Product Safety, Health, and Environment

At Great Lakes Rubber we recognize environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public.

We will comply with applicable laws and regulations on environmental protection to preserve resources and protect the environment, including but not limited to requiring design and materials to maximize the recycling of the products supplied to us, as well as the materials and components incorporated in the products, properly handling, processing, using, transporting, storing, and disposing of hazardous waste, and use reusable packaging whenever possible.

Reporting Integrity and Compliance Issues

At Great Lakes Rubber acting with ethics and integrity is central to how we conduct our business. We set high standards for ethical behavior and ourselves to meet our standards and live our Guiding Principles, even under the most challenging circumstances.

We expect to be honest and transparent in conducting business and to have the courage to do what is right; subject to any restrictions imposed by law.

To report a concern, contact your Coordinator, General Manger or President. All concerns will be treated confidentially