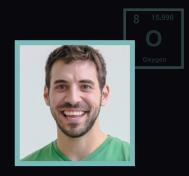




CODE OF CONDUCT

OUR VALUES & PRINCIPLES











CUSTOM GLASS SOLUTIONS (269) Sg Seaborgium

OUR CORE ELEMENTS



SAFETY FIRST,
DO THE RIGHT THING,
WOW YOUR CUSTOMER,
RELATIONSHIPS MATTER
AND CAN-DO ATTITUDE.





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Message from the CEO

At CGS we take great pride in doing business ethically, honestly and successfully. We thrive because our customers trust us and we treat our employees, communities, and environment with respect. Our Core Elements illustrate the value we place on delighting our customers, providing meaningful work for our employees and cultivating strong relationships within our communities. Demonstrating these principles strengthens our company, affirms our excellent reputation and advances our success in the marketplace.

This Code of Conduct embodies and expands on those Core Elements, showing how we act ethically, respectfully, safely and proactively at all times while vigorously conducting our business and successfully achieving our goals.

Doing business isn't always easy, we face multiple challenges every day but, no matter our position at CGS, each of us can benefit from the guidelines this Code provides. Use this Code as a resource to help guide your decisions and behavior. We have proven that we can conduct business ethically and transparently while competing boldly and successfully in the marketplace. We do this by putting our principles into practice, empowering our teams and living our Core Elements. Be authentic, honest, and respectful; act on the principles our Core Elements and this Code embody; and hold yourself and others accountable for honoring our values.

I am extremely proud of our team at CGS and the talent and dedication of our employees. Living up to our Code is both a team and individual responsibility. Please read the Code to understand our expectations. I can summarize those simply: "Do the right thing—always."

I want to thank you for your commitment to our company and for your dedication to our past and future success. Together we will continue to maintain and enhance our reputation for integrity, work collaboratively and creatively and create tremendous value for our company, our customers, and our communities.





Matthew J. Dietrich, CEO



INTRO

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INTRODUCTION

TOGETHER WITH OUR SHARED CULTURE AND VALUES.





1. INTRODUCTION

At Custom Glass Solutions, we abide by a set of Core Elements that reflect the shared values and principles that shape our conduct as individuals and as a company. These Core Elements—Safety First, Do the Right Thing, Wow Your Customer, Relationships Matter and Can-Do Attitude—are integral to our unique culture. This Code of Conduct reflects those elements and is designed to guide your interactions with coworkers and customers, and our company's relationships with suppliers, governmental agencies, our communities, and the environment.

Together with our shared culture and values, we:

- Agree to respect each other's ideas, experiences, and backgrounds.
- Believe that our racial, ethnic, cultural and gender diversity makes us stronger and helps us compete in the marketplace.
- Believe everyone should have an equal chance to succeed, and we make sure we're all treated fairly.
- Make intentional efforts to ensure our workplaces provide welcome environments for people to create meaningful relationships and synergies, internally and externally.
- Do the right thing in our dealings with coworkers, clients, other companies, and institutions.

- Maintain impeccable ethical standards in all business affairs, and we embrace honesty and authenticity.
- Agree that consistently acting with integrity provides more value to our company than cutting corners or looking the other way.
- Work to ensure that our relationships with our coworkers, our company and our community are based on trust.
- Trust that together we'll maintain a safe, secure environment, and we each do our part to strengthen trust within our company, with clients and with other organizations.
- Champion service and a can-do attitude in our interactions.
- Go the extra mile for our internal and external customers, and
- Approach our work with creativity and a collaborative spirit.

QUESTION

Does management really expect me to follow this Code of Conduct if it means losing business or reducing profitability?

ANSWER

Yes. We will not act unethically or compromise our values to make a profit.

Each of us has a different role at CGS with different responsibilities, relationships and types of interaction. But we all must commit to living by these principles in our daily conduct. By doing so, we ensure that we fulfill our mission to our customers, employees and communities to be the preferred provider of high-quality glass products, services and solutions. We aim to deliver superior results by producing the best possible products in a way that creates meaningful work for our employees, developing opportunities with our suppliers and cultivating partnerships with our customers.

Why a Code of Conduct?

This Code serves as a resource you can use to understand how CGS puts its values into practice. It provides guidance on how to respond to the many challenging circumstances that are becoming more common in our increasingly complex world. By understanding this Code, you'll make informed, appropriate decisions both inside and outside of work. By using the resources our Code provides, you won't need to make difficult decisions alone. In fact, you shouldn't make them without thoughtfully applying this Code and seeking guidance when in doubt.

Ask Questions and Speak Up

While the Code and its examples provide a useful reference, you might encounter situations where you'll want the advice and counsel of others.

CGS has resources you can use when you're unsure about the right course of action. With these resources, you don't need to worry when you come up against a difficult situation and can feel safe and comfortable voicing concerns when they arise.

The following is a list of individuals, departments, and other resources that you can safely and confidentially turn to with questions or concerns:

- Your immediate leader
- Any member of CGS Leadership
- Any Human Resources leader
- The CGS Ethics & Compliance Helpline

You can submit questions and concerns to the Ethics and Compliance Helpline in the following ways:

- Online: www.safehotline.com
- Call Toll Free: 1-855-622-SAFE (7233), or
- Text Company ID (2653063545) to: 1-855-622-7233



The Ethics & Compliance Helpline is powered by Safe Hotline, an independent third-party reporting service that CGS uses to capture anonymous reports and concerns. All reports received will be submitted exactly as they're reported to the Helpline and will only reveal your identity if you choose to do so. The Helpline is an effective way to safely share concerns and raise questions and is especially valuable if all other regular communication channels prove to be ineffective. This tool helps to ensure all CGS personnel are meeting ethical and legal compliance expectations.

Who Must Follow the Code?

Everyone employed at CGS—all full-time, part-time, and temporary employees, as well as directors and officers-must abide by this Code in their daily working lives. Beyond CGS, seek to do business toward clients, vendors and other organizations that respect the spirit of our Code.

What to Expect When You Use the Ethics & Compliance Helpline

The Compliance & Ethics Helpline is available 24 hours a day, seven days a week. The Helpline is an independent third-party service that will field your questions and concerns and forward them to CGS Compliance personnel for further investigation. When you contact the Helpline, you can choose to remain anonymous. All reports will be treated equally whether submitted anonymously or not.

After you make a report, you'll receive an identification number so you can follow up on your concern. Following up is especially important if you've submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case.







Know Your Responsibilities

Throughout this Code, we refer to our Core Elements to show how these concepts can be put into practice. The decisions you make and the actions you take should reflect our values and policies. You should also adhere to all applicable laws and regulations.

- · We expect you to understand how this Code can be applied to situations you encounter, the values that govern how we do business, and how our policies apply to your role. You don't need to memorize this Code, but you're expected to understand the topics it covers.
- Ask questions when you don't understand or have difficulty making a decision. Resources are available to help you do that, easily and safely.
- If you see or suspect anything illegal or unethical, share your concerns promptly.
- Report possible violations of the law or company policy promptly. Continue to report any issue, you believe hasn't been appropriately resolved, even if it means raising it with another resource.
- When we ask for your help in investigating a potential violation of this Code, you'll be expected to cooperate and provide complete and truthful information.
- Never act illegally or unethically, even when doing so may seem to be in the best interest of the Company or when a leader or any other employee has told you to do so.

What Are My Additional Responsibilities as a CGS Leader?

- · As a CGS leader, your responsibilities also include the following:
- Encourage employees to raise questions and concerns.
- Never retaliate or tolerate retaliation for a question or concern raised in good faith.
- Evaluate, recognize, and reward employees who do the right thing.
- · Hold yourself and your team members accountable for acting in accordance with our Code and our Core Elements. Be a role model for putting our Core Elements into practice.
- Provide training and resources to your team that help them understand our Core Elements, policies, and this Code.

OUESTION

I'm a manager, and I'm not clear what my obligations are if someone comes to me with an accusation - and what if it involves a senior leader?

ANSWER

No matter who the allegation involves, you must report it without exception. We provide several avenues for reporting concerns. If you're uncomfortable making a report to a particular person, you can reach out to any of the other resources listed in the Code or another member of CGS Leadership.

How Is Misconduct Handled?

CGS will investigate any report of a potential violation of this Code, a CGS policy or the law in a timely and objective manner. We hold all reports in confidence to the maximum extent possible, consistent with the law and a thorough investigation.

When we make a determination about a potential violation you've reported, we'll provide you an update on the determination, as appropriate and as permitted by law. If you've filed an anonymous report through the Helpline, we'll attempt to provide you information through the Helpline in order to maintain your anonymity.

Corrective Actions and Employee Discipline

If we verify through an investigation that a violation of the law, this Code, or our policies has occurred, we'll take corrective action that's appropriate to the circumstance. That action could include discipline up to and including

termination, updates to our Code or policies, or notification to an appropriate government agency.

Non-Retaliation

Reporting a concern or problem sometimes requires courage. For many reasons, it may be difficult or uncomfortable for you to voice concerns. We recognize that difficulty, and will treat you respectfully when you make a report and throughout any follow-up investigation. We won't tolerate retaliation against anyone who raises a genuine concern, asks a tough question, or participates in an investigation.

If you're a leader, you must ensure your team understands we forbid any and all forms of retaliation. You must also comply with this policy yourself and consistently enforce this policy with your employees.





CODE OF CONDUCT

USE THIS CODE AS A RESOURCE TO HELP GUIDE YOUR DECISIONS AND BEHAVIOR.





DO THE RIGHT THING



SECTION 2

WE ABIDE BY IMPECCABLE ETHICAL STANDARDS



2. DO THE RIGHT THING

We abide by impeccable ethical standards in making decisions and in conducting our business. We don't lie, mislead, cheat or bribe in our dealings with others, and we expect the same of you in your relationships and interactions with coworkers, clients, vendors, and outside organizations, and with CGS as an employee.

Ethics and integrity guide our lives at CGS in many ways, both in our personal dealings and in our interactions with other groups on behalf of the company. This section provides information and guidance on doing the right thing in specific areas and situations. Become familiar with these guidelines so that you understand what's expected of you in your daily activities. When you're unsure of the proper course of action, reach out to one of the resources provided in this Code. A conversation could help you better understand the circumstances surrounding a situation and make the best choice.

and make the best choice.

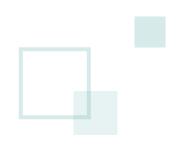
ETHICAL PERSONAL BEHAVIOR

Conflicts of Interest

A conflict of interest can occur anytime you have an interest that could interfere with your ability to make an objective and effective decision for CGS. Conflicts of interest can also occur if you, a family member, or friend receive personal benefit as a result of your position at CGS.

Preserving our good reputation is essential to our long-term success. Because conflicts of interest can undermine the trust others place in us and damage our reputation, each of us needs to guard against even the appearance of a conflict.

Conflicts of interest can be real. potential or matters of perception. Sometimes they're not clear-cut. If you think a personal action, association or financial decision could compromise - or appear to compromise - your objectivity or affect your ability to make impartial business decisions, then a conflict of interest could exist. Such as creating, or appear to create, an opportunity for you, your family, friends or an associated group to benefit at the company's expense. Before proceeding, disclose the situation to your leader or Human Resources representative so that they can properly assess, monitor, and manage the situation to avoid any risk of a conflict. Prompt disclosure can help us easily avoid and effectively manage many potential conflicts.



Generally speaking, you should:

- Always make business decisions in the best interest of CGS.
- Think ahead and avoid situations that could put your interests or those of a family member in potential conflict with our company.
- Don't speak or act on behalf of CGS outside of the boundaries of your normal duties without obtaining prior authorization.
- Avoid doing company business with friends or others with whom you have a close relationship.
- Disclose any relationship, outside activity or financial interest that might present a conflict of interest or the appearance of a conflict with your manager as well as Human Resources.

The situations discussed below highlight common areas where conflicts of interest can arise.

Corporate Opportunities

If you learn about a business opportunity through your job, the opportunity belongs to CGS. You can't take for yourself an opportunity you discover on the job, nor can you direct it to a family member or friend. This can be described as discounted or free products, services, or otherwise valuable opportunities that must be appropriately used and applied for business purposes.

Family and Friends

You might find yourself in a situation where you're working with a close friend or relative who works for a customer, supplier, or competitor. It's impossible

to predict all the situations that could create a potential conflict, so to be safe, tell your leader or Human Resources about your situation so that we can determine whether any precautions should be taken. Always avoid recommending or using your position to influence the use of a supplier if you, a friend, or family member could benefit improperly from your recommendation.

Personal Work

Never hire employees you supervise for personal work.

QUESTION

My son applied for a summer internship in my department. He's qualified for the job and won't report to me. Can we hire him?

ANSWER

This is a potential conflict of interest. Providing you're not involved in hiring him, his hiring process is the same as other candidates and he doesn't report to you, this won't constitute a conflict of interest. However, because this situation might still be perceived as a conflict of interest, consult with Human Resources first.



Personal Investments

Your investments in CGS customers, suppliers or competitors shouldn't be large enough for someone to reasonably think you could do something to benefit your investment at our expense.

Community Involvement

We encourage volunteer work and participation in civic organizations. If you're asked to become a director or trustee of a nonprofit organization, you should first notify Human Resources.

Insider and Personal Trading

Various laws prohibit trading stocks and other securities based on material information that isn't publicly known. (Material means information that investors would find valuable in making decisions about whether to buy, sell or hold a stock or other security.) To protect yourself and the company:

- Don't buy or sell stocks, bonds, or financial investments in CGS's suppliers or customers if you're aware of material information about these companies not known to the public.
- Don't provide material, nonpublic information to others, including friends and relatives. You and your friends and family could be prosecuted if they trade based on that information.

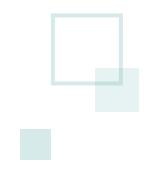
Violating our expectations on insider trading can subject you to disciplinary measures, up to and including termination. This policy doesn't affect your obligations under your confidentiality agreement with CGS or reduce your responsibility to maintain the confidentiality of information about companies

we do business with, whether those are privately held or publicly traded.

Gifts, Hospitality and Charitable Donations

When people exchange gifts or make charitable donations in a business context, it can appear that favors are being granted in order to influence business decisions. Some employees may provide and accept modest gifts, meals, entertainment, and travel to or from someone with a business connection with CGS only if it's appropriate for the business relationship. Ask your leader if you are uncertain whether your role within the company is authorized to give or receive gifts. Any gift (including charitable donations), meal, entertainment or travel you offer or receive must:

- Be legal and have a reasonable value.
- Be consistent with the policies of the other person's employer.
- Not be intended or viewed as a bribe, kickback, or payoff.
- Not cause embarrassment to the company if publicly disclosed.



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- Be legal and have a reasonable value.
- Be consistent with the policies of the other person's employer.
- Not be intended or viewed as a bribe, kickback, or payoff.
- Not cause embarrassment to the company if publicly disclosed.

Ask your leader or another resource for help if you're unsure whether the gift or entertainment you expect to give or receive is appropriate, ethical, and legal.

Keep in mind that you shouldn't offer or accept anything that could be deemed illegal or that could:

- Impair, or appear to impair, your ability to perform your job responsibilities,
- Create the appearance of impropriety, or
- Embarrass you or CGS, including entertainment at sexually oriented establishments.

Giving or receiving gifts, entertainment or other gratuities may require

documentation. Charitable donations almost always require documentation and must first be approved by Human Resources. Be sure to disclose all gifts or donations to your leader to ensure the proper documentation and expectations have been completed.

Gifts Involving Government Officials

Don't offer, make, or permit payments or gifts to governments, government officials, political parties, officials of political parties or politicians in order to obtain a business advantage for CGS or to direct business somewhere. These require a higher level of diligence that includes independent review and approval by Human Resources and CGS Executive Leadership.

QUESTION

Our janitorial supplier has offered me two of the best seats at a football Bowl game. The supplier will be there, and I'm sure we can discuss business while watching the game. Is this OK?

ANSWER

At a minimum, the total cost of the tickets should be within policy limits, and there must be a true business benefit to attending the event. In other words, you can't discuss business simply to try to legitimize the tickets. Ask your supervisor and Human Resources for advice and approval.

Business Inducements

Sales-related rebates, discounts, credits, and allowances are common business inducements. When offering them to customers, however, we need to ensure that the incentives are legal and ethical and that we comply with currency exchange controls, tax regulations and anti-money laundering laws. Business-inducement payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to which the original sales agreement or invoice was made or issued. They can't be made to individual officers, employees, or agents of the business entity, or to a related business entity, and they should be made only in the country of the entity's place of business.

Government Interactions

We have a strong reputation in our communities, including with governments at all levels. Some CGS employees are authorized to interact with governments or to certify compliance. However, you may only do this for matters that fall within your responsibilities and decision-making capacity. Certain government

interactions, including those below, require prior approval from Executive Leadership.

- Providing a payment, gift or gratuity, or travel or entertainment, including business meals, to a government official, or to charities, individuals or entities designated by a government official.
- Making commitments to the government on behalf of CGS.
- Agreeing to, or advocating, permitting, operating or other business activities not already prescribed by law.
- Bidding, proposing pricing or terms, or entering a contract or other commercial relationship with the government.

If you're unclear about whether you have the authority to submit information to or otherwise engage with government, get guidance from senior leadership.

Also, note that this policy doesn't limit you in any way from communicating with government officials when required by law or to report allegations of illegal conduct.

Who Is a "Government Official"?

Government officials include employees of government-owned or -controlled companies. Any employee of these companies, regardless of level, is considered a "government official." Traditional officials (such as legislators, judges, ministers, governors, and regulators), members of public organizations (like the organizations that set industry standards, or United Nations organizations), political candidates and political parties are also "Government Officials."

Political Activities

We strive to be a good neighbor by supporting our communities and exercising our political rights. We're committed to doing the right thing in fully complying with all laws and regulations that cover interactions with governments. You should always tread carefully in this area and ask for guidance when you're uncertain. To ensure we're acting lawfully:

- Make sure you're not identified as acting on behalf of CGS in your political activities unless the Company has asked you to do so.
- Don't meet or communicate with political candidates or government officials on behalf of CGS or to discuss issues that could be viewed as in the Company's interests without prior approval of Human Resources.

Whether you're a CGS employee or our agent, you must adhere to the following requirements:

- · Always be truthful in your dealings with the government.
- Never engage in misrepresentation, misstatement, or omission of a material fact. Ensure that all documents and reports are truthful, accurate, timely and complete. This includes all supporting documentation that may be required.
- · Immediately notify your leader of any misstatement, misunderstanding, material omission or other error in a document submitted to a government entity.

Ethical Company Behavior

FAIR COMPETITION

We support fair and honest competition and open markets. Competition laws are known as antitrust laws in the U.S. and exist in most countries where we do business. These laws help encourage and preserve fair and honest competition. While we're always keen to compete, we always comply with all competition and compliance laws that apply to us.

QUESTION

One of my friends, who used to work at CGS, is having a fundraising event for an upcoming political election. May I attend if I pay for the event with my own money? What if I win a door prize; may I accept it?

ANSWER

Good news--you may attend, and you may accept the door prize! But you can't go as a representative of CGS, and you must make it clear that you represent only yourself. Also, you can't use any company resources, such as printers, paper, computers, etc., to promote or raise money for your friend.



To ensure we always compete fairly and lawfully, never engage in the activities listed below. If you become aware or believe they're occurring, report them to Human Resources:

- Collusion —Companies secretly communicate or agree on how they'll compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of customers, territories or markets. It also could include agreements on the use or nonuse of specific companies as business partners.
- **Bid-Rigging**—Competitors or service providers manipulate bidding to limit fair competition. This might include comparing bids, agreeing to refrain from bidding or knowingly submitting uncompetitive bids.
- Tying A company with market power forces customers to take products or services that they don't want or need.
- **Predatory Pricing** —A company with market power sells a product or service below cost in order to eliminate or harm a competitor, at times intending to later recover the revenue loss by raising prices after the competitor has been harmed or eliminated.

Gathering Competitive Intelligence

Properly gathered business information and competitive intelligence are extremely valuable to our company. But don't get information about our competitors directly from the competitors themselves—doing so risks violating competition laws. Instead, gather information from public sources.

- Any meeting that includes competitors should have a specific agenda prior to the meeting (avoiding discussion around pricing, costing, and competitive influences)
- Additionally, a written record of discussions should be provided to participants after the conclusion of the meeting so that there is certainty we maintained proper ethical competitive discussions.

OUESTION

One of my coworkers, who recently joined us from a competitor, brought with her the competitor's customer and price lists. She says she plans to use it to our advantage. Should I just ignore this and let her do it?

ANSWER

No. If an employee retains competitor information, it can result in legal action by the competitor. Report this to Human Resources for appropriate action.

QUESTION

I'm an inside sales rep. One of my counterparts at a competitor sent me an email suggesting that his company was considering raising prices in the next quarter. What should I do?

ANSWER

While we encourage positive and productive business relationships, you should make it clear to your counterpart at the competitor that you do not want any additional information as it could be perceived as collusion. In addition, report this to your leader and Human Resources.

Supplier and Contractor Relations

We choose suppliers based on neutral and objective criteria such as price, quality, sustainability and prior performance. When working with suppliers or contractors, you must:

- Require competitive bids where appropriate.
- Fairly evaluate all proposals for work.
- Get legal advice before initiating any business with former employees or board members.
- Avoid any real or perceived conflicts of interest.
- Comply with confidential information laws between company, suppliers and competitors.

If we're bidding on business, don't ask the procurement manager to divulge competitors' proprietary information. Don't offer anything of value to anyone involved in the procurement of our goods and services (including suggestions of future employment opportunities).

We require suppliers and contracts to comply strictly with all applicable legal requirements relating to the activities and the business environment.

Consultants and Sales Partners

We sometimes hire consultants or sales partners for assistance with various business needs. These third-party partners may include contact with our potential or existing suppliers, partners, public and private authorities, and customers. We have strict processes

for approval, screening, hiring, management, and payment of sales partners. We require all consultants and sales partners to strictly comply with our policies and all applicable laws and regulations that apply to their activities.

Antibribery and Anticorruption Laws

A bribe is money or anything of value given or promised in order to acquire or retain business or a business advantage. We don't offer or accept bribes, kickbacks, or other corrupt payments. Bribery is illegal everywhere we do business. In your dealings on behalf of CGS, observe the following rules:

QUESTION

We have a shipment stuck in Customs abroad, and our Customs broker suggested that we just pay a local Customs official \$250 to expedite the process. Is this OK?

ANSWER

No. We don't pay bribes of any kind, in any amount, except under extraordinary circumstances such as to protect personal safety. Consult with Human Resources if you have questions about requests for such payments and report your Customs broker remark to them as well.

- Don't offer, promise, make or approve any improper payment to anyone to influence a business decision.
- · Never accept a bribe or kickback.
- Be especially careful when interacting with government officials, including employees of state-owned companies.
- Use agents and others acting on our behalf only after they've been approved by Human Resources through our due diligence process. You may not use a third party to do what CGS can't lawfully or ethically do itself.
- Report any concerns about bribery, including any request for or offer of a bribe, to Human Resources or leadership immediately.

Trade Sanctions and Antiboycott Laws

Various countries and organizations, including the United Nations, the U.S., and the European Union, have imposed trade sanctions against certain countries, organizations, and individuals for political reasons. Some of these sanctions apply to transactions beyond the borders of the country imposing them. Some sanctions impose a complete ban on all dealings in certain countries or with certain entities, while others may ban a specific type of transaction, such as trading in specific goods or providing particular services.

CGS complies with all legal sanctions of countries, organizations, and individuals. If you're involved in

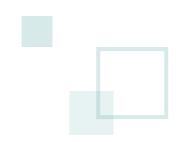
international business transactions, you must be familiar with and comply with applicable trade sanctions.

Talk with your manager about the resources available to stay updated with regulations related to your position.

Trade and Customs Laws

Whenever we move products, technology, software, or information across borders, we're subject to trade laws and economic sanctions. To help us comply, if you're involved in importing or exporting products, equipment, or technology, observe the following rules:

- Make sure all imports and exports are accurately classified and labeled and receive necessary approvals.
- Understand the trade and sanctions laws that apply to the countries you're trading with and consult with your leader to ensure you follow those laws.
- If your team is considering a new kind of import or export, trading with a new country or excluding a country from trade, speak with your leader.



Customs laws require us to report to the U.S. Customs Service the correct classification, value, and country of origin of all of our imports. As an importer, we must be able to demonstrate through a documented, auditable trail that we exercised reasonable care in ensuring that our imports comply with all applicable laws. This requires, at a minimum, the reporting of true, accurate and complete information regarding any imported product, its place of manufacture and its full value.

If you have any doubt about whether export control requirements apply in a given situation, then stop, think, and ask any of the resources available to you.

Whistleblower Rights & Non-Retaliation

If you have knowledge of or a concern of illegal, dishonest, or fraudulent activity, you should report this immediately. 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 you are not sure whether the concern involves an illegal or dishonest activity, you should still bring the concern forward for discussion. However, someone who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Employees who bring these concerns forward, are commonly called "whistleblowers" and are protected in

two important areas -- confidentiality and against retaliation. To the greatest 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. CGS 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 Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.



Federal law also provides specific protections under the Defend Trade Secrets Act (DTSA): "Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:

- 1. Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.
- 2. Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order."

All reports of illegal and dishonest activities will be promptly submitted to the appropriate personnel who is responsible for investigating and coordinating corrective action.

Employees with any questions regarding this policy should contact the Director of Human Resources.







BE AUTHENTIC, HONEST AND RESPECTFUL.



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SAFETY FIRST



SECTION 3

WE KEEP OUR WORKPLACE SAFE AND SECURE.





3. SAFETY FIRST

We keep our workplace safe and secure. We follow our safety workplace guidelines and take steps to ensure that everyone:

Respects our security protocols,

- · Works in the safest way possible,
- Maintains safe working conditions, and takes immediate action to resolve any unsafe condition.
- Wears appropriate personal protective equipment, and
- Is alert, healthy and fully capable of carrying out their job responsibilities.

We look out for one another on the job. If you see an unsafe condition, activity, or behavior, say something. Take direct action if it's a critical situation, or report it to your leader immediately. An unsafe situation can affect everyone, not just the people immediately involved. Identify areas where safety could be improved, and hazards reduced. Change your behavior or your work environment to better reduce safety risks. Take responsibility for preventing occupational illness or injury to yourself and others. Speak up when you see violations, or areas or activities where improvements could be made.

Fear has no place at CGS. We don't tolerate acts or threats of violence, intimidation, or verbal abuse. We forbid harassment of any kind--physical, sexual, verbal, or otherwise.

We prohibit weapons of any kind on our

premises or at work-related functions. We comply with regional and national laws concerning firearm ownership and appreciate that responsible gun owners respect our safety policies.

The use of drugs or alcohol on the job can impair your judgment and motor skills and jeopardize the safety of others. We forbid the possession, use or distribution of alcohol or illegal drugs at work, along with the abuse or distribution of prescription medications. When approved, drinking alcohol at company functions is fine, but be sure to drink moderately and comply with company policies and the law on alcohol consumption

QUESTION

We just implemented some new safe work practices. I've been doing this kind of work for more than 5 years, and I've never been hurt. Why do I have to change the way I do things?

ANSWER

Safety is always our number one priority. We implement new safe work practices to better reduce risks to you and your coworkers and to make sure we continue to comply with regulations and our EH&S Policy. If you're concerned about the new practices or have ideas to improve them, talk to your leader or local safety professional. We welcome your input--your experience and knowledge can help us strengthen our practices.

Protecting Our Assets and Ideas

Our company's assets are physical--our building, furniture, equipment, and tools—and electronic—the computer hardware, software, and network infrastructure we use to communicate and manage our data.

Our company's information is an asset, too, and in many respects it's our most valuable one. Information is the data we use to conduct our business efficiently and profitably and that provides our competitive edge. This includes intellectual property such as patents, copyrights, trademarks and trade secrets as well as business plans, customer contacts, sales records, and financial data.

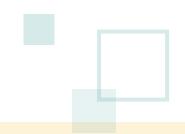
QUESTION

I've witnessed a coworker being verbally abused by his supervisor. He doesn't want to complain. How can I help?

ANSWER

Talk with your coworker to confirm your perception of the situation and explain the value of filing a report and that it can be done anonymously. It's possible they are not the only person being subject to abuse, but either way, thier supervisor must understand that abusive behavior is unacceptable and change thier approach. If necessary, tell HR about the situation. Don't let the abuse continue by doing nothing and hoping the situation will improve on its own.

We are all responsible for protecting our assets from loss, damage, and theft and for complying with company policies when we use them. Apply your good judgment when you use company resources, and understand the steps in the following sections to make sure you're accessing them responsibly and in accordance with our policies



QUESTION

I think that some practices we follow in my area are unsafe. Who can I speak to? I'm new here, and don't want to be considered a troublemaker.

ANSWER

Discuss your concerns with your leader or a member of the safety team. There could be valid reasons for the practices but voicing your concerns will help you understand those. Remember that your input is valued and that raising concerns when it seems appropriate is the right thing to do.

Protecting Our Property

Our company's assets are physical--our building, furniture, equipment, and tools—and electronic—the computer hardware, software, and network infrastructure we use to communicate and manage our data.

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Protecting Our Property

Observe our plant security protocols.

- Care for and maintain the tools and equipment assigned to you.
- Keep your work area clean and clutter free.
- Report equipment that's damaged, unsafe or in need of repair.
- Keep company vehicles clean, and report problems with performance or reliability.

Protecting Our Electronic Systems

- Use strong passwords. Protect them and change them regularly.
- Don't install unauthorized software or hardware on your computer.
- Access our network only through authorized applications and devices.
- Don't copy and transport files to work on a personal computer for someone else to use.
- Don't access unauthorized sites on company equipment. It's easy and common for malware and other malicious code to be transferred from websites that might otherwise seem legitimate.
- Make sure your firewall and virus and malware protection applications are running and are up to date. If they're not and you can't update them, contact IT.
- Don't open suspicious links in emails, even if you know the source. The message might be coming from somewhere other than the sender.

Protecting Our Supply Chain

We are committed to safeguarding our supply chain from the use of counterfeit parts by implementing rigorous sourcing, inspection, and verification processes, and by requiring our suppliers to adhere to strict quality control standards that ensure the authenticity and integrity of all materials and components.

Protecting Our Information

In our digital age, privacy has become increasingly important and increasingly difficult to maintain. The ways we communicate—via email, texting, and social media—can compromise the security of confidential information.

Storing information on a local server or in the cloud can risk hacking or piracy.

Our coworkers, clients and partners trust us to maintain confidentiality in our communications and our handling of information. Any information related to our business should be considered private unless designated otherwise. This includes:

- Personal information—Name, employee ID, phone number and other information that directly or indirectly identifies someone. This includes information about our employees as well as those of our customers and partners.
- Customer and partner information—Contact lists, descriptions of process and procedures, sales and other proprietary information shared with us by clients and partners.
- Classified or restricted government information – we strictly follow the security procedures applicable to classified or restricted government information.
- Financial information—Banking, income and expenses, projections and forecasts, strategic plans, loans and sales data (when not publicly available).
- Intellectual property—Details on processes, procedures, formulas, patents, technology infrastructure or other proprietary data.

Keeping Personal Information Safe

Our policies respect privacy laws that govern how to responsibly manage personal information. Follow them to ensure you're fully protecting personal information. Don't share personal information with anyone inside or outside the company unless unauthorized to do so.

When managing personal information, follow these guidelines:

- Only use personal information for limited and legitimate business reasons and ensure its use is fair and lawful.
- Make sure personal information is accurate, relevant, securely handled, and deleted when no longer needed.
- Ensure we comply with all applicable privacy laws.

QUESTION

I sometimes access the Internet or make personal calls on company equipment. I save the company time by doing this rather than getting out my phone. Is this OK?

ANSWER

We appreciate that you place a high value on company time. Incidental and infrequent use of company resources to browse the internet and make personal calls is allowed. Make sure, though, that you don't abuse these privileges or violate our policies. Also, be aware that we may monitor your use of company systems: when you send an email, make a phone call or store information using our systems, your information is company property, not private.

Communicate Carefully

Communicate on behalf of CGS responsibly, and tailor your message to its purpose. Refer to our policies when you craft an email or plan a phone call, and follow these guidelines:

- Choose the most effective communication method. Don't labor over an email if a call is faster and just as effective.
- Clearly state the purpose of your communication and stick to the point.
- Make sure your message is accurate and factual.
- Use language appropriate for a business communication. Stick to the facts and don't speculate or exaggerate.
- Don't make legal conclusions unless you're qualified to do so.
- Don't discuss or otherwise reveal any information, particularly proprietary information, that's not relevant to your communication.

Communicating with the Public

We speak with one voice at CGS--our message and brand are strongest when our communications are consistent and aligned. We present ourselves and our activities transparently, honestly and accurately, and any communications on behalf of the company should too.

To help ensure we're communicating clearly and consistently:

- Don't speak on behalf of the company unless you're authorized to do so.
- Don't use your company title or affiliation outside of work, such

- as in charitable or community work, without clarifying that you're doing so only to identify yourself and that you don't represent the company.
- Decline invitations to speak "off the record" to reporters or others who request information about CGS.
- Refer questions about our activities, financial performance, or strategic plan to Leadership.
- In your activities online, including social media, user forums, blogs, and chat rooms, never give the impression that you're speaking on behalf of CGS.

QUESTION

My computer is extremely slow, and I'd prefer to use my personal laptop so that I can work faster. Is there any problem with this?

ANSWER

Yes there is. Electronic security threats are ever-present and ever-changing. Our IT group invests a lot of time and effort in securing our systems from malicious attacks. Unless your device has been approved by them for use on our network, don't bring it to work. Malware and viruses are often difficult to detect and connecting your device might infect our systems without you knowing it. Instead, ask IT to examine your PC to see if they can improve its speed.



Using Social Media

Social media is a part of our lives, and most of us use it to communicate and stay connected. We respect the power of social media; if used responsibly, it can enhance awareness of our company's business activities and community involvement. We can use social media to inform current or potential clients, vendors, current and future employees and the public at large about a wide range of activities, opportunities, and insights regarding our business. And we can do this quickly, efficiently and in real time, so that we can address and respond to changes and opportunities in the marketplace as well as critical situations when needed.

Needless to say, our reputation and goodwill are on the line with every post we make. As a CGS employee, your social media posts can reflect well or badly on our company: they can raise awareness and enhance public opinion of our activities, or they can harm our business if you reveal private information or include inaccurate or inflammatory statements.

To help make sure your posts align with our interests, follow these guidelines:

- Before posting on social media, consider the potential impact your post might have on CGS. Make sure the information you plan to post is truthful and accurate and doesn't put the company in a bad light.
- Keep confidential information confidential and share only public

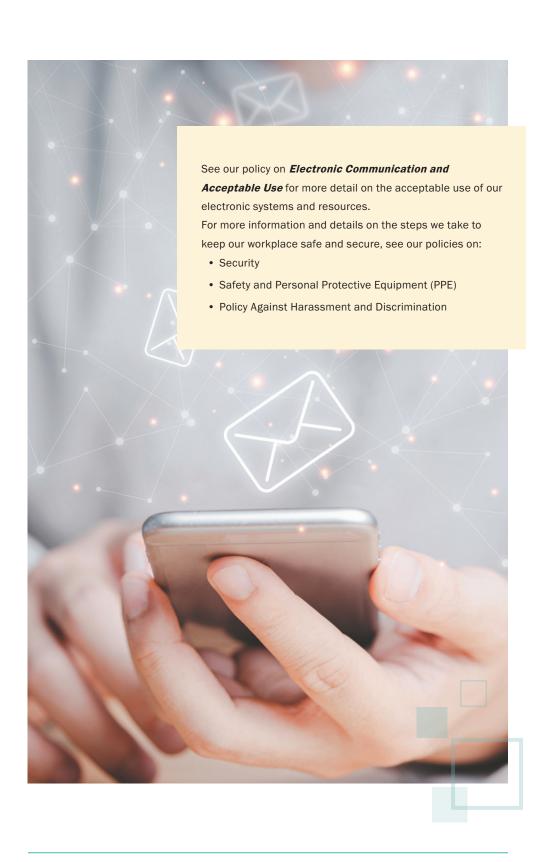
- information. For example, don't share pictures or information on new products that haven't been officially announced. Don't share proprietary information, such as manufacturing processes, engineering specifications, strategic plans, or financial results.
- Give credit where it is due don't claim the work of others as your own.
- Make it clear you're sharing your own opinion and not speaking for CGS.
- Monitor responses to your post to make sure it's received the way you intended. Clarify your message if you need to and remove it if it results in unintended consequences.

OUESTION

I have a friendly relationship with my counterpart at a client. Our emails and calls can be informal and chatty and sometimes go beyond discussing business. Is this OK?

ANSWER

Being on friendly terms with a client makes the day go faster and can benefit our relationship. It is fine to include humor and not be strictly business at all times. Moderation is key: if the focus remains business, you avoid discussing rumors and speculation, and appropriate humor and informality enhance your communications and relationships, you can continue to enjoy your friendly communications.







WERESPECT ONE ANOTHER'S IDEAS, EXPERIENCES AND BACKGROUNDS.

4. RELATIONSHIPS MATTER

Respect and relationships are fundamental to how we do business. We respect one another's ideas, experiences, and backgrounds. We believe diversity makes us stronger. We make sure we treat everyone equally and fairly and that everyone has an equal chance to succeed. And we work to ensure our workplace environment remains safe and healthy.

To create and maintain a culture that champions respect, ensures equality and fairness and celebrates diversity and inclusion, we need to behave in ways that allow these ideas to flourish. Specifically, we must:

- Treat each other with honesty, dignity, respect, and sensitivity.
- Honor the differences that make each of us unique and look for ways our diversity can make our business stronger.
- Deal with others fairly and impartially.
- Make sure we and our partners respect laws and policies that promote diversity, inclusion, and human rights; protect employee health and safety; and safeguard the environment.

Fair Treatment and Equal Opportunity

Because respect is fundamental to how we operate, we don't tolerate unfair treatment by, or directed at, any employee, applicant, guest, customer, contractor or supplier that's based on or motivated by race, color, religion, gender, age, ethnic background, national origin, physical or mental disability, sexual orientation, gender identity, marital status, veteran status, citizenship status, pregnancy, genetic information or any other status protected by law or by company policy.

OUESTION

I don't like some of the people I work with—their customs and backgrounds are different from mine and make me feel uncomfortable. I want to be a good team player, but my feelings are based on my own background and beliefs—what can I do?

ANSWER

Most of us like some people better than others due to differences in beliefs, customs, or any number of other reasons. We don't expect you to like all of your coworkers. But you are expected to treat everyone you work with respectfully, and to provide the same level of respect to all of your coworkers, regardless of how you feel about them. Our policy isn't meant to change your feelings, but to ensure we can all depend on consistent, mutually respectful behavior. Ideally, you might find that treating every coworker with an equal amount of respect could make it easier to see your commonalities rather than your differences and result in new friendships.

We are also an affirmative action employer and provide employees and job applicants equal employment opportunities that comply with all applicable national, regional, state, and local laws governing nondiscrimination in employment. That means we recruit, hire, train, promote, compensate, develop, and retain the most qualified people from a diverse candidate pool.

Zero Tolerance for Harassment

We don't tolerate harassment of any kind for any reason under any circumstance. This includes bullying, coercive behavior, intimidation and other behaviors that exploit power or undermine the safety of others.

A basic definition of harassment is verbal. physical, written, or other conduct that's regarded as unwelcome, offensive, intimidating or disparaging. If you're not sure how your words or behavior might be taken by another person, stop and think of a way to phrase your statement or express yourself in a way you're sure will be accepted.

If you've been bullied or harassed by anyone working at or for CGS, immediately report the incident to your leader, Human Resources, or both. If you're a leader who learns of such an incident, you should immediately report it to Human Resources, CGS is committed to promptly and thoroughly investigating any complaints and taking appropriate action.

Our Commitment to Human Rights & Fair Labor Practices

As advocates of human rights and fair labor practices, we uphold the rights of individuals across our operations, the communities in which we work, and throughout our supply chain. We are committed to providing a safe and healthy work environment, ensuring fair compensation for our employees, and adhering to laws that protect equal pay. minimum wage, overtime, freedom of association, and the right to collective bargaining.

We are Committed to Treating **Everyone with Fairness and Dignity By:**

- Providing fair pay, hours, benefits, and safe working conditions
- · Never using forced or child labor, or engaging in corrupt labor practices
- Requiring our suppliers to adhere to workplace practices that align with our own standards
- Fostering collaboration, interaction, tolerance, and respect within the workplace
- · Ensuring our suppliers and subcontractors uphold the same rigorous labor standards we follow
- Ensuring that the raw materials used in our products do not directly or indirectly fund conflicts, human rights abuses, or involve unethical treatment of animals
- Upholding the rights of all individuals, including women, minorities, indigenous peoples, and other marginalized groups, and promoting their equal treatment across our operations and supply chain

We operate with fair employment practices wherever we do business and prioritize caring for one another as a team. How do we achieve this? From the front office to our manufacturing floors, we are dedicated to advancing human rights for everyone, everywhere. Our commitment to protecting human rights goes beyond conducting ethical business; it's a promise to treat every individual with decency, dignity, and respect. We expect the same from the companies we partner with.

What's your role in this? It's simple—follow the law, stay vigilant, and speak up if you see anything that violates our commitment to human rights. You are on the front lines, witnessing how others are treated in the workplace. If you become aware of noncompliance with human rights laws or suspect that this may be occurring, alert your leader and the Human Resources department.

QUESTION

I applied for an internal position and believe that someone less qualified than I was chosen due to my gender. Who can I talk to?

ANSWER

We make employment decisions based on skills, experience, abilities, and alignment to our Core Elements – not gender. If you believe gender or other irrelevant or illegal factors affected your application, talk with Human Resources or another resource provided in this Code. It's important to confirm that bias didn't affect your hiring decision in any way and that you understand the basis for the decision.

Diversity, Equity & Inclusion

We hire and promote the best talent and offer every employee equal opportunity for success.

We support diversity, equity, and inclusion by:

- Hiring, promoting, training, and compensating employees based on their qualifications, performance, skills, and experience
- Ensuring diverse perspectives are included at all levels of decision-making
- Treating everyone with fairness and respect
- Never discriminating against individuals or groups

Help us ensure everyone has an equal opportunity to succeed by celebrating differences and inspiring those around you to be their best selves. We value all forms of diversity, including but not limited to: age, ancestry, citizenship, color, race, religion, ethnicity, disability, marital status, medical condition, genetic information, military and veteran status, political affiliation, national origin, sex (including pregnancy, childbirth, breastfeeding, and related conditions), gender identity, sexual orientation, and more.

At CGS, we strive for excellence, and we know greatness comes in many forms. We ensure every team member feels valued, included, and respected. Our people are our greatest asset, and we protect them by promoting inclusion, diversity, and fair employment practices, and by never tolerating discrimination.

Respect for the Environment

We take stewardship of our environment seriously and comply with all environmental, health and safety (EH&S) regulations that apply to our businesses. We may also set standards that exceed regulatory requirements when we decide that's the right thing to do.

Each of us has a role to play in making sure that throughout our operations, we identify, minimize and eliminate damage to the environment and its related impact on our communities.

- Understand our plans and work to meet our objectives for reducing environmental risks and improving our environmental protections.
- Stop work if you believe continuing could result in a loss of containment or any consequence that might damage the environment.
- Report situations or events that risk or result in environmental damage.
- Look for ways we can reduce waste, emissions and discharges and use energy more efficiently.

You are responsible to learn the requirements that apply to your position and consider potential environmental risks and compliance requirements in your business decisions. When you evaluate measures to control those risks, it's important to choose the best option, not the least expensive.

If you're a manager, make sure your team members understand and work to meet EH&S expectations related to their roles and your department. Consult with and involve your team members in matters affecting their health and safety and the environment. Commit the resources necessary to meet EH&S expectations and strive to exceed them.

Anyone who knowingly violates applicable policies, laws or regulations related to environmental health and safety or this Code can be subject to disciplinary action up to and including termination of employment.





In addition to strengthening our relationships, embracing our diversity helps us do our jobs better and improves our bottom line. Our varied backgrounds and customs provide different perspectives and insight into many kinds of cultures and marketplaces. That helps ensure we're engaging with all of our customers in ways that are respectful and providing products that fully address their needs.

FINALLY



SECTION 5

WE EXPECT YOU TO READ AND UNDERSTAND THIS CODE.

4. FINALLY

Throughout this document, we've tried to present the concepts and principles that make up our Code as plainly and straightforwardly as possible.

But there's no denying that a lot of information is presented here, and that some of it is highly detailed and specific.

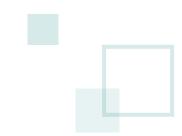
We expect you to read and understand this Code. But we don't expect you to memorize it or to carry it in your back pocket at all times. Instead, we expect you to align your daily decisions and actions to the intention and spirit of these principles and hold yourself and others accountable to impeccable ethical standards.

Also, some sections will pertain to your current situation while others won't. The goal is to have a common understanding of our Core Elements, principles, policies, and practices that guide us individually and as a company. That understanding will help ensure we're all working together for our common good. In turn, that assurance will enable us to work more effectively, more collaboratively and more creatively as well as enable our workplace cultures to evolve more positively and productively.

Times have changed, and the nature of employer/employee relationships has evolved. This Code represents that evolution and presents a relationship based on a partnership that's rooted

in mutual respect, appreciation, and trust. With you, we hope to approach our work as a shared endeavor that's challenging, fulfilling and, ideally, deeply satisfying. We know that satisfaction can vary from day to day--we each have our ups and downs, and each of us leads complex lives full of commitments and challenges. But we can aspire to work together honestly and respectfully with an "all in" determination to produce win-win solutions. Those qualities will only help our company grow and prosper and will put us in good stead for the challenges we encounter in the future.

We hope you'll respond positively to this approach as a shared agreement and commit to the principals we've discussed in this Code. We encourage you to embody a competitive spirit that inspires bold action and challenges the status quo. Join us on our journey and mission to be the preferred provider of high-quality products, services, and solutions, because it takes the best people to make the best glass.













WE CAN CONDUCT BUSINESS ETHICALLY AND TRANSPARENTLY WHILE COMPETING BOLDLY AND SUCCESSFULLY IN THE MARKETPLACE.





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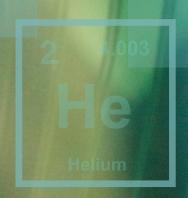
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OUR CODE



DO THE RIGHT THING—ALWAYS.









CUSTOM GLASS SOLUTIONS

CODE OF CONDUCT



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