
VI. Work Conditions and Hours

6.13 Communications/Whistle Blower Information

<p>COMMUNICATIONS/WHISTLE BLOWER INFORMATION</p>

1. PLANT ACCESS BY OFF-DUTY EMPLOYEES

OFF-DUTY EMPLOYEES ARE NOT PERMITTED IN THE INTERIOR OF THE FACILITY OR IN ANY OUTDOOR WORK AREAS EXCEPT ON COMPANY BUSINESS. COMPANY BUSINESS INCLUDES ATTENDING MEETINGS, TRAINING SESSIONS, CONFERRING WITH THE HUMAN RESOURCE DEPARTMENT, ETC.

2. COMPUTER/ELECTRONIC COMMUNICATION USAGE

The equipment, programs, and data contained in our computers and networks are considered Company assets and are maintained to support the business. Employees are expected to make every effort to protect these assets from harm and misuse. You are responsible for maintaining the confidentiality of material on the Company's systems. You may not remove from the premises any hardware, software, files or data without written permission from your Manager or the President. Copyrights and restrictions that pertain to outside materials and trade secrets shall be respected. Do not install or download programs to the network or to a PC without prior approval from the IT department.

It is the policy of Keystone Powdered Metal Company that the use of information systems and the information contained within is limited to employees of Keystone and others to whom Keystone has specifically granted access. Use of these systems for any purpose other than reasonable personal use and Company business is prohibited. Occasional personal use is permitted within reasonable limits (this applies to web, emails, texts, and cell usage). Phone usage is prohibited on the manufacturing floor unless individual has a company issued cell phone and is using for company business. In addition, the Company's systems are not to be used in a way that may be disruptive, offensive to others, or harmful to morale. For example, the Company prohibits the access, display or transmission of sexually explicit images, messages, or cartoons, or any transmission or use of voice mail, e-mail or Internet communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or disparagement of others based on their race, color, religion, sex, age, national origin, disability status, veteran status or any other protected category. Employees may not use company systems to solicit or recruit others for commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitations, or use the systems to perform work for another employer or in the furtherance of some outside business.

Employees should not have an expectation of privacy with regard to Keystone's computer systems. Keystone Powdered Metal Company reserves the right to access, monitor, and inspect all messages, files and other data placed in these systems—as deemed necessary and appropriate and take corrective measures as it deems necessary. Although the Company reserves the right to access such information, employees are strictly prohibited from accessing another employee's personal voice mail or e-mail messages without the latter's express permission. Any questions regarding this policy should be directed to your manager or the Director of Human Resources. Failure to adhere to these rules may result in disciplinary action, up to and including termination.

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3. COMMUNICATIONS

REGULAR COMMUNICATION IS VITAL TO OUR COMPANY'S PERFORMANCE. THERE ARE SEVERAL METHODS THAT ARE USED TO LET EMPLOYEES KNOW ABOUT ISSUES THAT ARE IMPORTANT TO OUR BUSINESS.

Our bulletin boards are used to provide immediate information on activities and events occurring in the plant. Bulletin boards are for company use only and all posted material must be approved by a member of the Human Resource Department. Communication is also posted on Keystone's Intranet – under "NEWS".

Regularly scheduled All Employee Meetings will be held to discuss Company performance measures, industry information, and any other relevant news.

Informal Huddle Meetings and other daily conversations within the department are the most practical form of communications being used in our facility.

Communication is a "two-way street" and we invite your ideas and comments. If you feel the need to speak to someone other than your immediate supervisor, please contact anyone in the Human RESOURCE DEPARTMENT.

OPEN COMMUNICATIONS AND PROBLEM RESOLUTION POLICY

It is our intention to operate the Keystone Powdered Metal facility in such a way as to maintain an open and free exchange of ideas, information, problems, and complaints. When a problem surfaces, it should be discussed immediately and resolved in a reasonable period of time. In most cases your supervisor should be able to resolve your problem. He or she should involve the director of human resources if necessary.

There may be occasions, however, when the problem is one that your supervisor cannot resolve or one that you do not feel comfortable in discussing with your supervisor. In these cases, an employee should discuss the matter with the appropriate department manager. If the problem is not resolved in a reasonable period of time, please contact the Director of Human Resources.

As with all other policies outlined in Keystone Powdered Metal's Employee Handbook, no employee will ever suffer any retaliation for following this procedure.

As another resource for reporting or discussing issues, Keystone Powdered Metal Company has implemented a Whistle Blower System. We will make efforts to ensure the anonymity of any report while performing a thorough investigation. Whistle Blower Notices are posted within our organization outlining the communication avenues of the system (phone, email, and mail).

Keystone Powdered Metal Company Whistle Blower Number - 814-781-4491

The commitment of Keystone Powdered Metal Company to conduct its business lawfully and ethically is fundamental to our very existence as a corporation. It is critically important that all employees meet the highest standards of legal and ethical conduct. Each of us has an obligation to behave at all times with honesty and respect because such behavior is morally and legally right, and because Keystone Powdered Metal Company business success is dependent on its reputation for integrity and on the trust and confidence of everyone with whom we deal.

At Keystone Powdered Metal Company, we have a strict code of conduct, the commitment to ethical behavior is not a matter of vague principles. This policy highlights key issues and identifies them

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in order to assist Keystone employees in managing their responsibilities. Some examples of whistle blower situations could be Safety concerns, Environmental concerns, Health concerns, Harassment concerns, etc. These are examples and in no way encompasses all possible scenarios. This applies to all employees of Keystone Powdered Metal Company whether employed by Keystone Powdered Metal Company or a Temporary Staffing Agency. The Director of Human Resources of Keystone Powdered Metal Company is responsible for the administration of the Whistle Blower system. Any questions or comments regarding this policy or compliance to the policy should be directed to the Director of Human Resources for review.

No employee shall face retaliation from Keystone or any member for the reporting of conduct that they believe in good faith contradicts any portion of our code of conduct. Any suggestion to the contrary is in itself a violation of the policy. It will be the intent of the company to preserve the confidentiality of all communications involving policy violations. Any employee of Keystone Powdered Metal Company who is confronted with a concern or possible violation should report the concern or possible violation directly via your choice of three methods: mail, e-mail, or by phone. The system will be responded by:

Andrew Glass
VP of HR and EHS

OR

Paul Orr
Vice President of Operations

Keystone Powdered Metal Co.
251 State Street
St. Marys, Pa. 15857
(814) 781-4491
aglass@keytonepm.com

Keystone Powdered Metal Co
251 State Street
St. Marys, Pa. 15857
(814) 781-4413
porr@keystonepm.com

Please help us better understand your concerns by following these guidelines for reporting:

1. Please state your name or you may remain anonymous (name will be held in confidence)
2. Fully state the subject of concern
3. Preferred method of follow-up contact (phone, e-mail, meeting)

All concerns or possible violations shall be responded to by the Director of Human Resources or Vice President of Operations within 15 working days of the original date of receipt of the concern or possible violation. The initializing employee shall receive a written response at the end of the 15 working day period, unless additional time is needed in which case the employee shall be informed of the expected date of response. We accept anonymous report and will make best efforts to ensure the anonymity of any report while performing a thorough investigation.

If the initializing employee is not satisfied with the response reached by Director of Human Resources or Vice President of Operations then the employee may submit the concern or violation in writing directly to the President. The President is responsible for the final disposition on the concern or violation within 10 working days after receiving the concern or violation. If the President needs additional time, the 10 working day period may be extended.

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SEI Whistle Blower Number

1-844-238-4402

Web: <http://sei.ethicspoint.com>

Sumitomo Electric Industries (SEI) offers a confidential hotline number that enables you to report your concerns about theft, fraud, or other wrong doings in our workplace. It is an independent company Navex Global that will report your concerns back to the Compliance and Risk Office. You can choose to remain completely anonymous.

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