



Code of Ethics and Business Conduct

Rev D 3/17/2026

Statement of Our Core Values

Partnership – Service – Integrity – Work Life Balance

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers, suppliers, shareholders, and the communities in which we operate. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

KAM Plastics is committed to partnering and doing business only with customers, suppliers, and other organizations that share our commitment to ethical, lawful, and responsible conduct. We believe strong, values-based partnerships are essential to long-term success and maintaining the trust of all stakeholders.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. KAM Plastics is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

KAM Plastics is an equal employment employer committed to providing a workplace free of discrimination from abusive, offensive, or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

KAM Plastics will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive, or unwelcome.

Create a Culture of Open and Honest Communication

At KAM Plastics everyone should feel comfortable speaking his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

KAM Plastics will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, KAM Plastics' whistleblower policy is as follows:

Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, KAM Plastics President does operate with an open-door policy.

Set Tone at the Top

Management has the added responsibility of demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At KAM Plastics we want the ethics dialogue to become a natural part of daily work.

Financial Responsibility

KAM Plastics is committed to accurate, honest, and transparent financial practices. Maintaining the integrity of our financial records is essential to earning and preserving the trust of our employees, customers, suppliers, and shareholders.

All financial transactions must be recorded accurately, timely, and in accordance with applicable laws and company policies. Employees must ensure that expense reports, time records, invoices, and other business documents are truthful and complete. False or misleading entries are strictly prohibited.

Company funds and assets must be used responsibly and only for legitimate business purposes. We are all expected to follow established approval processes and internal controls. Fraud, theft, or misuse of company resources will not be tolerated and must be reported promptly in accordance with our reporting policies.

Uphold the Law

KAM Plastics' commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must understand the company policies, laws, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or KAM Plastics policy, we should seek the advice from the resource expert. We are responsible for preventing violations of the law and for speaking up if we see possible violations.

Because of the nature of our business, some legal requirements warrant specific mention here.

Prohibition of Forced Labor

Forced labor in any form—including bonded labor, involuntary prison labor, slavery, or human trafficking—is strictly prohibited.

Young Workers

Child labor will not be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum employment age in the country of operation, whichever is greatest.

These standards reflect our broader commitment to protecting human rights and ensuring fair and lawful working conditions throughout our operations and supply chain.

Export Controls and Economic Sanctions

KAM Plastics complies with all applicable export control and economic sanctions laws. Employees and suppliers must not engage in unauthorized transactions with restricted parties or regions.

Human Rights and Working Conditions

In addition to our prohibition of forced labor and child labor, KAM Plastics will uphold internationally recognized human rights and maintain fair, lawful, and respectful working conditions throughout our operations and business relationships. We expect our suppliers and business partners to uphold these same standards.

Wages and Benefits

KAM Plastics will comply with all applicable wage and hour laws, including minimum wage, overtime compensation, and legally mandated benefits. Employees will be paid accurately and on time for all hours worked. Wage deductions will not be used as a disciplinary measure.

Working Hours

KAM Plastics will comply with all laws governing working hours, overtime, and required rest periods. Employees will not be required to work in excess of legal limits. Overtime will be compensated in accordance with applicable law. Consistent with our Core Value of Work Life Balance, we will make reasonable efforts to promote safe and sustainable working schedules.

Ethical Recruiting

KAM Plastics prohibits deceptive, fraudulent, or unethical recruitment practices. Recruitment practices must comply with applicable labor and anti-trafficking laws.

Women's Rights

KAM Plastics will provide a workplace free from discrimination, harassment, or unequal treatment based on gender or any legally protected characteristic. Gender-based harassment, intimidation, or violence will not be tolerated.

Diversity, Equity, and Inclusion

KAM Plastics values diversity and will provide equal employment opportunity without discrimination. Retaliation against individuals who raise concerns related to discrimination or harassment will not be tolerated.

Rights of Minorities and Indigenous Peoples

KAM Plastics respects the rights, cultures, and identities of minority groups and Indigenous peoples. We will not engage in discrimination or business practices that infringe upon these rights.

Health and Safety

KAM Plastics will provide a safe and healthy workplace in compliance with occupational health and safety laws. Employees must follow safety policies and report unsafe conditions immediately.

Environmental Responsibility

KAM Plastics will comply with all environmental laws and is committed to responsible management of waste, emissions, and resource use.

Animal Welfare

KAM Plastics supports the humane treatment of animals and expects suppliers to comply with applicable animal welfare laws and standards.

Freedom of Association

KAM Plastics will follow labor law requirements regarding employees' freedom of association and collective bargaining.

Use of Security Forces

KAM Plastics does not employ private or public security forces in its operations.

Should security services ever be required, KAM Plastics will ensure that such services operate in a manner consistent with applicable laws and respect for human rights, including the rights and dignity of all individuals.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell KAM Plastics products and services based on their merit, superior quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for KAM Plastics or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Counterfeit Parts

KAM Plastics prohibits the use of counterfeit or suspect parts. Materials are sourced from approved suppliers and verified to meet requirements. Suspected counterfeit parts must be reported immediately.

Anti-Corruption and Anti-Bribery

KAM Plastics strictly prohibits all forms of corruption, bribery, kickbacks, and other improper payments in any business dealings. Employees, officers, and representatives of KAM Plastics must not offer, promise, give, request, or accept anything of value in order to obtain or retain business, secure an improper advantage, or influence a business decision.

This prohibition applies to interactions with customers, suppliers, government officials, and any other third parties. Improper payments may include cash, gifts, entertainment, travel, favors, services, or other benefits. KAM Plastics is also committed to complying with all applicable laws designed to prevent money laundering, terrorist financing, and other financial crimes.

Employees must comply with all applicable anti-corruption and anti-bribery laws in the jurisdictions where we operate. Any request or offer that may be perceived as a bribe or improper inducement must be refused and reported promptly in accordance with the reporting procedures outlined in this Code.

KAM Plastics also expects its suppliers, contractors, and business partners to adhere to the same standards of ethical and lawful conduct.

Avoid Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of KAM Plastics may conflict with our own personal or family interests. We owe a duty to KAM Plastics to advance its legitimate interests when the opportunity to do so arises. We must never use KAM Plastics property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with KAM Plastics.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while you are employed with KAM Plastics.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier, or contractor.
5. Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, for purposes of sourcing business.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

Gifts, Gratuities, and Business Courtesies

KAM Plastics is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by KAM Plastics was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom KAM Plastics does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of KAM Plastics or customers, or would cause embarrassment or reflect negatively on KAM Plastics reputation.

Data Protection and Privacy

KAM Plastics is committed to protecting the privacy and security of personal and sensitive information belonging to employees, customers, suppliers, and business partners.

Employees must handle such information responsibly, use it only for legitimate business purposes, and protect it from unauthorized access, disclosure, or misuse.

KAM Plastics expects suppliers and third-party service providers who access company systems or data to maintain appropriate cybersecurity controls and to protect company information from unauthorized disclosure or misuse.

Any suspected data breach, loss of information, or unauthorized disclosure must be reported immediately so that appropriate steps can be taken to protect affected individuals and the company.

Confidential, Proprietary Information & Authorized Disclosure

Integral to KAM Plastics' business success is the protection of confidential and proprietary information, including nonpublic information entrusted to us by employees, customers, suppliers, and business partners.

Confidential information includes, but is not limited to, financial data, customer and supplier information, contracts, product designs, processes, trade secrets, strategic plans, and personnel information.

Employees must protect confidential information and may not disclose or use it without a legitimate business need and proper authorization. This obligation continues after employment ends.

KAM Plastics is committed to transparency and will, where required or appropriate, disclose and report information to customers, regulators, and other stakeholders, including non-financial information such as:

- Labor practices and working conditions
- Health and safety performance
- Environmental impact and sustainability practices
- Ethical business conduct

Nothing in this policy restricts the reporting or disclosure of information required or permitted by law, regulation, customer requirements, or Company policies.

All external disclosures must be accurate and made only by authorized representatives. Unauthorized disclosure of confidential information may result in disciplinary action, up to and including termination.

Use of Company Resources

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use is allowed if it does not affect job performance or disrupt the workplace.

Employees and those who represent KAM Plastics are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of the KAM Plastics network and our fellow employees, KAM Plastics reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Kam Plastics intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Media Inquiries

KAM Plastics is a known company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Human Resources Manager. No one may issue a press release without first consulting with the Human Resources Manager.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

- Does what I am doing comply with the KAM Plastics Code of Conduct and company policies?
 - Have I been asked to misrepresent information or deviate from normal procedure?
 - Would I feel comfortable describing my decision at a staff meeting?
 - Am I being loyal to my family, my company and myself?
 - Is this the right thing to do?
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Reporting Human Rights, Environmental, or Unethical Business Practices

KAM Plastics is committed to conducting business with integrity, respect for human rights, environmental responsibility, and adherence to all applicable laws and ethical standards. We expect all employees, suppliers, and business partners to uphold these principles in their daily activities.

Any employee who becomes aware of potential human rights violations, environmental concerns, unlawful conduct, or other unethical business practices has a responsibility to report such concerns promptly. Reports may include, but are not limited to, concerns related to forced labor, child labor, workplace safety, environmental compliance, fraud, corruption, or violations of this Code.

Employees are encouraged, in the first instance, to report such concerns to the Human Resources Manager:

Marcy Covey – mcovey@kamplastics.com – 616-355-5935

If for any reason an employee is not comfortable raising the concern with Human Resources, or if the matter involves Human Resources, reports may be made directly to the President:

Chad Wiersma – cwiersma@kamplastics.com – 616-745-2828

All reports will be handled discreetly and investigated promptly. KAM Plastics will not tolerate retaliation against any individual who raises concerns in good faith. Employees who report concerns honestly and responsibly will be protected from retaliation, even if the concern is ultimately unsubstantiated.

Rev. Level	Rev Date	Author	Mgr. Approval	Reason for update	Doc. Control Approval
IR	8/2/2024	Marcy Covey	Chad Wiersma	Initial Release	T. Schauder

A	2/13/26	Marcy Covey	Chad Wiersma	Added Financial Responsibility & Reporting	T. Schauder
B	2/26/26	Marcy Covey	Chad Wiersma	Added Human Rights and Working Conditions	T. Schauder
C	3/6/2026	Marcy Covey	Chad Wiersma	Added Anti-Corruption, Anti-Money Laundering, Data Protection, and Data Security sections	T. Schauder
D	3/17/2026	Marcy Covey	Chad Wiersma	Updates to Uphold the Law, Human Rights and Competition sections	T. Schauder