



ETHICS & COMPLIANCE MEMORANDUM

FROM	CASCADE GASKET COMPLIANCE	DATE:	06-21-2021
TO:	VALUED SUPPLIERS	PURPOSE:	ETHICS & COMPLIANCE

It is our expectation that employees and suppliers working with Cascade Gasket self-monitor in order to ensure compliance with the substance of this code; and understand and agree to adhere to our core values and shared global and environmental responsibilities, commitments, and promises. This includes ensuring that individuals are aware of their contribution to product and service conformity, their contribution to product safety; and the importance of ethical behavior.

In addition, employees and suppliers must comply fully with all applicable laws, regulations and their contractual obligations with us, and with these fundamental standards of business conduct as they apply within the context of the supplier's organization.

ETHICS & COMPLIANCE POLICY

1. ETHICAL DECISION MAKING



ETHICS & COMPLIANCE POLICY

INTERNAL COMMUNICATION

Cascade Gasket empowers employees with the knowledge and tools they need to make ethical decisions by intentionally and regularly communicating to all employees:

- ORGANIZATIONAL POLICIES AND PROCEDURES AS THEY APPLY TO ETHICS AND COMMON WORKPLACE ISSUES
- APPLICABLE LAWS AND REGULATIONS
- THE UNIVERSALLY AGREED UPON VALUES THAT ARE; PRUDENCE, JUSTICE, FORTITUDE, TEMPERANCE EMPATHY, PATIENCE, KINDNESS AND RESPECT
- EMPLOYEE ACCESS TO A DEFINITIVE INTERPRETATION OF POLICIES, LAWS AND RELEVANT EXPECTATIONS

2. CONFLICT OF INTEREST

ORGANIZATIONAL CONFLICT OF INTEREST

In addition to personal conflicts of interest, the work Cascade Gasket performs for one customer could conceivably conflict with current or anticipated work for another



ETHICS & COMPLIANCE POLICY

customer. Employees should be vigilant in identifying all such potential conflicts and bring them to the attention of their management or ask for clarification from a trusted authoritative source.

OUTSIDE INTERESTS

Cascade Gasket does allow employees to engage in other outside business activities provided there are no conflicts with employee performance, the company's mission and/or contractual obligations. While the use of facilities, equipment, and other company resources are not authorized for personal business interests, nominal use of such resources may be approved to support employee participation in professional associations when in the interest of the company and the individual.

3. KEEP ACCURATE AND COMPLETE RECORDS

RECORD COSTS / TIME PROPERLY

Employees are essential to the health and success of the company. All employees must ensure that their time is properly recorded and / or charged to the appropriate



3. KEEP ACCURATE AND COMPLETE RECORDS

job order numbers, and that any travel or other off-site work activity costs are consistent with customer requirements and in compliance with established policies and protocols. Timekeeping is to be done daily. This helps to ensure more accurate time recording and complies with our contractual commitment to our customers to record our work effort on a daily basis.

GET APPROPRIATE APPROVALS

The Signature Authorization System is the means by which internal actions are delegated for authorized approval within the company. Properly approved internal documents are the basis for these actions and for the preparation of documents legally / contractually committing the company. Changes to the established Business Management System (BMS) Processes / Procedures and associated Forms / Records require written authorization / approval prior to being implemented.

RECORDS INTEGRITY



3. KEEP ACCURATE AND COMPLETE RECORDS

Any and all Cascade Gasket records must remain accurate, complete and legible at all times. Stamps and/or other handwritten Initials / Dates reflecting the completion of operations or other documented work activities are records that may be subject to audits by Customers and/or the Government.

SIGNATURES / INITIALS I.E. ACCEPTANCE AUTHORITY MEDIA

- REVIEW COMPLETED WORK ORDERS FOR ACCURACY (OMISSIONS, TYPOS, LEGIBILITY ETC.)
- REVIEW IN-PROCESS WORK ORDERS TO ENSURE DOCUMENTATION IS COMPLETED AS PLANNED
- REVIEW IN-PROCESS AND COMPLETED WORK ORDERS AND TRAINING RECORDS FOR UNAUTHORIZED OR UNTRAINED PERSONNEL, FALSIFICATION OF DOCUMENTATION, WORK NOT PERFORMED AS PLANNED AND/OR AS INDICATED ETC.



3. KEEP ACCURATE AND COMPLETE RECORDS

- REVIEW TRAINING MATERIAL TO ENSURE IT ADEQUATELY COMMUNICATES THE IMPORTANCE OF NOT FALSIFYING RECORDS
- UNDERSTAND THE IMPORTANCE OF ETHICAL BEHAVIOR INCLUDING REPORTING AND NOT PASSING ON DEFECTS OR NONCONFORMITIES; AND ADHERE FULLY TO INTERNAL RULES AND ESTABLISHED POLICIES AND PROCEDURES
- FLOW DOWN AAM COMPLIANCE TO RELEVANT SUB-TIER SUPPLIERS

4. EXPECTATIONS

Our customers and associated Government Agencies expect from us technically accurate quality engineering, procurement, planning / production, manufacturing and inspection records. If an employee identifies a discrepancy and or ambiguity that could potentially impact product quality, he or she is required to communicate any concerns to the appropriate level of authority even if it means escalating concerns to upper management and if necessary, to the level of the President and CEO. All employees, each and every individual, has this obligation. A potential problem can take many forms



4. EXPECTATIONS

from material specifications to equipment that is not suited for the requirement, an administrative software program with a potential vulnerability; or any other number of situations that can arise in our daily workplace. If such a situation occurs, make your concerns known and follow through to ensure the situation is resolved. It is this dedication to integrity, for the last 76 years, that has given Cascade Gasket our honorable reputation.

5. PROTECT COMPANY PROPERTY AND THE PROPERTY OF OTHERS

In the performance of Cascade Gasket's mission, we are entrusted with property belonging to others, not only tangible property (for example, government or buyer furnished equipment), but also intangible property such as ITAR / EAR, proprietary, confidential or otherwise protected information belonging to customers or other external providers

SENSITIVE PROPRIETARY INFORMATION

The importance of preventing disclosure of Cascade Gasket, Customer, Government information that could be of value to saboteurs, competitors, and espionage agents, including those engaged in industrial espionage, cannot be overstated. Employees are



5. PROTECT COMPANY PROPERTY AND THE PROPERTY OF OTHERS

expected to comply scrupulously with all compliance policies and practices concerning company information.

REPORT KNOWN OR SUSPECTED DATA SECURITY VIOLATIONS DIRECTLY TO COMPLIANCE

Our company is committed to respecting proprietary information, whether developed by Cascade Gasket, Customer, Government Agencies, Contractors and/or any other External Provider or Interested Party to which Cascade Gasket has been entrusted with access. This is true and applies to all circumstances regardless of how the information was delivered and/or received. This could be orally, in writing or any other electronic means.

ORIGINATED INTERNALLY

Cascade Gasket generates sensitive, proprietary and controlled-access technical information. For this reason, the protection of data and information security is vital to our industry reputation. Cascade Gasket protects this information, ensuring safekeeping and appropriate disposition / destruction of data and documents. The same is required of our suppliers. External distribution or disclosure of such Cascade Gasket-originated information is not permitted, except in conformity with company policies and practices and applicable non-disclosure agreements.

ORIGINATED EXTERNALLY



5. PROTECT COMPANY PROPERTY AND THE PROPERTY OF OTHERS

When proprietary information is accepted from an external source, it must be protected by every practicable precautionary measure to avoid improper use or disclosure to unauthorized persons. This information is also safeguarded in accordance with established Business Management System (BMS) policies and procedures and Customer, Statutory / Regulatory requirements.

FINALLY,

If you have questions or concerns, please don't hesitate to let us know. Please keep in mind any concerns and/or the reporting ethical violations shall remain anonymous.

Thank you in advance for your continued support and cooperation. If you have questions or would like additional information, please don't hesitate to contact us.

Yours respectfully,

TAMMY JORDAN

COMPLIANCE OFFICER

CASCADE GASKET & MFG. CO. INC.