



825 Northland Drive, N.E. • PO Box 360 • Rockford, MI 49341  
Phone (616) 884-7100 • Fax (616) 884-7200

## Global Ethics Policy

GRC is committed to doing what is right. This Code of Ethics has been created to give guidance if doing what is right ever becomes unclear. GRC's ethics represent a standard we should all strive to achieve and a standard to which we hold ourselves and each other accountable.

### Asking questions and raising concerns

Each person is expected to speak up if something is wrong, ask questions if unsure of the proper course of action, and report if there is a violation of anything stated in this policy. Ethic issues should be communicated with an immediate supervisor, manager, department leader or Human Resources if there are issues in the chain of command. Corrective action is to follow practices specified in the Employee Handbook.

People, who in good faith, speak up, ask questions, or report violations, are to be respected and in no way disadvantaged. Anyone who takes any form of retaliation against such a person will be disciplined up to and including termination of employment.

### Supporting a safe work environment

People's health and safety is our highest priority. We follow all applicable safety laws, regulations and assume all occupational injuries are preventable. We do not knowingly compromise the health and wellbeing of anyone.

Every employee is entitled to work in an environment free from violence, harassment, threats and intimidation. Weapons, even if intended for sporting or other purposes are never allowed on company property or in employee vehicles at work.

GRC forbids working under the influence of alcohol or drugs.

### Fostering respect and professionalism

GRC is committed to having a professional workplace that values responsiveness, participation, knowledge, quality of work and learning. We value diverse experiences, backgrounds, cultures and lifestyles that help GRC offer new perspectives and solutions to our customers. Our workplace is inclusive and should enable everyone to contribute fully.

It is unacceptable to display or distribute derogatory material or pictures that offends or demeans people for any reason, especially if it has to do with race, religion, national origin, demographic characteristics, disability, age; gender identity, veteran status or sexual orientation.

Sexual jokes, insults, and profane language are unacceptable as are unwelcome or inappropriate comments, physical contact, gestures, sexual advances or requests for sexual favors.

### Doing business with integrity

Each person at GRC is to be honest and fair in all business dealings and must never take actions that could undermine GRC's success or reputation.

Everyone is expected to avoid conflicts of interest or even the appearance of compromising GRC or a business relationship. Examples include investments in suppliers, customers and competitors or accepting personal services, loans, or payments from them. Other examples are personally benefiting from insider information and decisions that benefit a close family member or friend who works with a supplier, customer or competitor.

Receiving or offering gifts are to be reviewed with human resources. It is not acceptable to give, receive, or solicit bribes in any form or use our position over someone to violate the law or circumvent trade regulations. This would include offering anything of value directly, indirectly or through a 3rd party to a government official to influence his or her performance of official duties.



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Business related entertainment or social activities are not to be lavish and should be infrequent. Appropriate examples may include sporting events, cultural activities, or dinner when accompanied by a supplier or customer. The nature of the entertainment must withstand public scrutiny. Offering or accepting invitations to any form of sexual adult entertainment is not an acceptable.

### **Obeying employment laws**

GRC, its suppliers and any part of the supply chain must follow the applicable local laws and regulations of the country in which it operates.

Each company must pay at least the minimum wage and benefits required by law. Overtime compensation is to be given at a rate specified by law for work beyond normal hours and work is not to exceed the maximum hours specified in the law.

All labor in GRC, its suppliers, and supply chain must be at least 15 years old or over the age of compulsory education, whichever is greater. Any form of forced indentured or involuntary labor is prohibited. All work must be voluntary and each person must be free to leave work or terminate their employment with reasonable notice. Human trafficking or use slave labor is strictly prohibited.

We do not discriminate against worker representatives and we recognize people's rights to organize and bargain collectively as well as have access to what is specified in the law to carry out their required functions.

### **Competing fairly in the market place**

From design, delivery, to service, GRC executes all of its programs with great care and strives to do what is good for the customer in a way that does not put GRC and its future at risk.

No GRC employee should ever discuss prices, pricing strategy, product planning, marketing or terms/conditions with competitors. We do not enter into agreements with competitors on product offerings, pricing, volumes, or sales territories. We do not misrepresent a competitor's product or obtain competitor information illegally, through invasion of property or by coercion.

We safeguard and honor all intellectual property, including copyrights, patent, licenses, trademarks and other trade secrets including those of our customers and suppliers.

### **Protecting the environment**

GRC is committed to continual improvement of its environmental management system, which includes waste minimization, the prevention of pollution, setting and reviewing environmental objectives and targets, and compliance to all applicable federal, state and local regulations at every stage of the product life cycle.

We are also committed to meeting relevant environmental requirements of other organizations to which we subscribe.

### **Participating in politics**

GRC encourages people to be publically active, however it should be on their own time and with their own resources.