

SPG Cyber Security and Information Technology Policy

The following Policies, Standards and Procedures specify the Company's position relative to the use of personal computers ("PCs"), PC Networks, associated software, electronic mail, access to the Internet and use (generally "technology"). All current SPG full-time, part-time and temporary employees, persons employed by temporary employment agencies and all third-party contractors with access to SPG's Internet or electronic mail, must conform to these policies and standards and will be held accountable for failing to abide by them. Unauthorized access or use of technology, including without limitation, improper and illegal duplication of copyrighted materials, may be subject to civil and criminal penalties under applicable federal, state or local law. Ignorance of the contents herein will not be an excuse.

The Company's policies prohibiting harassment apply to the use of the Company's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, genetic information, religious beliefs or any other characteristic protected by applicable federal, state or local law.

Appropriate Use of Equipment and Software

The Company provides PCs, laptops, phones, servers and other equipment as tools for employees to meet legitimate business objectives. These tools are not to be used for personal use or any purpose detrimental to the Company. Inappropriate use of the equipment, including installing non-approved software, will result in disciplinary action including, without limitation, termination of employment.

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.

Please notify your supervisor if any equipment, machines, or tools appear to be damaged, defective, or in need of repair. Prompt reporting of loss, damages, defects, and the need for repairs could prevent deterioration of equipment and possibly injury to employees and others. The Supervisor can answer most questions about an employee's responsibility for maintenance and care of equipment used on the job.

Employees are also prohibited from any unauthorized use of the Company's intellectual property, such as audio and video recordings, print materials and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, including termination.

Further, the Company is not responsible for any damage to employees' personal belongings.

Internet Access

Access to the Internet, when provided, is also available for legitimate business purposes only. Employees do not have a personal privacy right in any matter created, received or sent on the Internet. Misuse of the Internet, including access to inappropriate adult, gambling, or other non-



business-related websites will result in disciplinary actions including, without limitation, termination. The Company actively monitors employee access to the Internet with periodic reports to management.

Using Social Media at Work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager. Do not use company email addresses to register on social networks, blogs or other online tools utilized for personal use.

Passwords

To ensure confidentiality and control, employees shall not disclose their passwords or security codes to anyone, including co-workers and administrative assistants. Software options that allow you to "save your password" are not to be used. It must be entered each time requested.

Electronic Mail

Electronic Mail is also provided to facilitate the business of the Company. It is to be used for legitimate business purposes only. The Electronic Mail and other information systems are not to be used in any way that may be disruptive, intimidating, offensive to others, or harmful to morale. Sending of mass, non-business-related e-mails is prohibited.

Specifically, it is against Company policy to display or transmit sexually explicit messages, pictures or cartoons. In addition, any such transmission or use of email that contains ethnic slurs, racial epithets, or anything else that may be construed as derogatory, libelous, harassing or offensive to others based on their race, color, religion, age, national origin, sex, sexual orientation, genetic information, disability or beliefs is strictly prohibited and will result in disciplinary action including, without limitation, termination.

In no event, shall an employee forward copyrighted material, employee records, trade secrets or any SPG proprietary information through the e-mail system. In no event may an employee use the electronic mail for solicitation purposes.

For privacy reasons, employees should not attempt to gain access to another employee's personal file or e-mail messages. However, the Company reserves the right to enter, inspect, review or disclose all communications data and information transmitted on the network without notice for any purpose. This includes, but is not limited to, bulletin boards, electronic messaging, electronic mail messages and notes. Employees do not have a personal privacy right in any matter created, received or sent from the electronic mail system. The Company reserves the right to monitor electronic mail and take appropriate disciplinary action, if necessary including, without limitation, termination for violations of this policy.

Cell Phones and Portable Communication Devices (PCD)

SPG is aware that some employees utilize PCD for legitimate business purposes. At the same time, PCD are also used for personal purposes and can be a distraction in the workplace. Infrequent, minimal and short personal use may be tolerated provided it does not interfere with business activities. Any personal usage must be immediately terminated when business activities require the employee's attention and/or response, or that of other employees in the immediate area. The following provides more specific guidance to the use of PCD and auxiliary devices:

- Headphones, headsets or earpieces (including Bluetooth cell phone earpieces) must not be used in a manufacturing area, warehouse, shop, labs or anywhere machinery or powered equipment is being used. Use in office areas should be for business purposes only.
- Cell phones use is not permitted in production areas except for business purposes.
- Radios may be used in a production environment, but volume must be low enough to prevent interference with alarms, warnings, communication or comfort of others. The comfort of other associates must be considered when using radios in all areas of the facility. Use of radios shall be considered a privilege subject to revocation by Area Leadership. Use of radios may be prohibited by EH&S should noise levels in an area reach or exceed hygienic standards for noise.
- Audio or video recording of information by non-SPG employees is Strictly Prohibited. Cameras and audio recorders are prohibited. Mobile phone use by visitors is STRICTLY limited to phone conversation only. It is the responsibility of the SPG employee guide to assure that visitors are always escorted when they are in possession of a recording device and have access to IP.

Company-provided portable communication devices, including cell phones and personal digital assistants, should be used primarily for business purposes. Employees have no reasonable expectation of privacy regarding the use of such devices, and all use is subject to monitoring, to the maximum extent permitted by applicable law. This includes as permitted the right to monitor personal communications as necessary.

Some employees may be authorized to use their own PCD for business purposes. These employees should work with the IT department to configure their PCD for business use. Communications sent via a personal PCD also may be subject to monitoring if sent through the Company's networks and the PCD must be provided for inspection and review upon request.

All conversations, text messages and e-mails must be professional. When sending a text message or using a PCD for business purposes, whether it is a Company-provided or personal device, employees must comply with applicable Company guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles. Any personal text messages sent or received on a company-issued PCD are subject to monitoring and will be reviewed by the Company.

If an employee who uses a personal PCD for business resigns or is terminated, the employee will be required to submit the device to the IT department for resetting on or before his or her last day of work. At that time, the IT department will reset and remove all information from the device including but not limited to Company information and personal data (such as contacts, e-mails, and photographs). The IT department will make efforts to provide employees with the personal data in another form (e.g. on a disc) to the extent practicable; however, the employee may lose some or all personal data saved on the device.

Employees may not use their personal PCD for business unless they agree to submit the device to the IT department on or before their last day of work for resetting and removal of Company information. This is the only way currently possible to ensure that all Company information is removed from the device at the time of termination. The removal of Company information is crucial to ensure compliance with the Company's confidentiality and proprietary information policies and



objectives.

Please note that whether employees use their personal PCD or a Company-issued device, the Company's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.