

TEKNI-PLEX, INC.'S EMPLOYMENT RELATED PRIVACY POLICY

(Version 2.0 | Rev 06/2023)

1. PURPOSE AND INTENT

Tekni-Plex, Inc., and its operating groups, parent(s), subsidiaries and affiliates (collectively, "Tekni-Plex, Inc.", "we" or "us") establish this Privacy Policy because we process the personal information of employees and independent contractors who are residents of California ("CA"). We are committed to protecting the privacy and security of your personal information. This privacy policy describes how we collect and use personal information about you during and after your working relationship with us. It applies to all employees and independent contractors of any part of Tekni-Plex, Inc. who are also CA residents. We are responsible for deciding how we hold and use personal information about you. We are required under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the "CCPA") to provide you with notice at the time of collection.

This policy applies to applicants, current and former employees and contractors and does not form part of any contract of employment or other contract to provide services. We collect, receive, use and share personal information for the foregoing work-related individuals. We do not:

- sell your personal information;
- share or disclose your personal information to third parties other than the entities or service providers referenced in the applicable Privacy Notice listed below;
- share or disclose your sensitive information to third parties for purposes other than those listed below or otherwise permitted by the CCPA;
- collect, sell or share the personal information of consumers under 16 years of age; or
- permit third parties to collect your personal information on our behalf other than the service providers referenced in the applicable Privacy notice listed below.

We may update this policy at any time.

It is important that you understand this policy, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. If you have any questions about this privacy policy or how we handle your personal information, please contact us by email at

ccpacompliance@tekni-plex.com or by mail to Tekni-Plex, Inc., 460 E. Swedesford Road, Suite 3000, Wayne, PA 19087, Attn: CCPA Compliance.

2. PRIVACY RIGHTS

As a California resident, you have the following privacy rights regarding your personal information:

- The right to know and right to access the personal information we have collected about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting, selling, or sharing personal information; the categories of third parties to whom the business discloses personal information; and the specific pieces of personal information the business has collected about the consumer;
- The right to delete personal information that we have collected from you, subject to certain exceptions;
- The right to correct inaccurate personal information that we maintain about you;
- The right of portability, or right to have us transfer your personal information to other persons or entities upon your request;
- The right to limit the use of your sensitive information if we decide in the future to use such information for purposes other than the purposes listed above; and
- The right not to be discriminated or retaliated against for exercising your of privacy rights.

You can exercise your privacy rights by submitting a request to us by emailing us at: ccpacompliance@tekni-plex.com or writing to us at: 460 E. Swedesford Road, Suite 3000, Wayne, PA 19087, Attn: CCPA Compliance; calling toll free at 855-781-6148, or asking our Human Resources department for a written request form. To protect the security of your personal information, we will require you to provide us with identifying information for you such as personal email address, personal telephone number, employee identification number, and/or other information that we can match with the personal information we have collected about you to verify your identity.

You may use an authorized agent to request access to or deletion of your personal information. We will require your authorized agent to provide us with either (1) a power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your personal information on your behalf. Further, we will require you or your authorized agent to provide

us with identifying information to verify your identity. We may also require you to either verify your own identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

Within 10 days of receiving your request to know, we will confirm receipt of your request and provide information about how we will process your request. Generally, we will respond to your request within 45 days. If we need more time to respond, we will provide you with notice and an explanation of the reason we need more time to respond. We may deny your request if we cannot verify your identity or are legally permitted to deny your request. If we deny your request, we will explain the basis for the denial, provide or delete any personal information that is not subject to the denial, and refrain from using the personal information retained for any purpose other than permitted by the denial. We will maintain a record of your request and our response for 24 months.

3. DATA PROTECTION PRINCIPLES

We will comply with applicable data protection law. This says that the personal information we hold about you must be: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) relevant to the purposes we have told you about and limited only to those purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for the purposes we have told you about; and (vi) kept securely.

4. WHAT PERSONAL INFORMATION IS COLLECTED AND HOW IT IS USED

For job applicants, please refer to Tekni-Plex, Inc.'s PRIVACY NOTICE TO CALIFORNIA JOB APPLICANTS REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about job applicants and how we use and disclose it.

For employees and former employees, please refer to Tekni-Plex, Inc.'s PRIVACY NOTICE TO CALIFORNIA EMPLOYEES REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about employees and former employees and how we use and disclose it.

For independent contractors, please refer to Tekni-Plex, Inc.'s PRIVACY NOTICE TO CALIFORNIA INDEPENDENT CONTRACTORS REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about independent contractors and how we use and disclose it.

5. FAILURE TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to address our employment or contract obligations (such as paying you or providing a benefit), or we may be

prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

6. CHANGE OF PURPOSE

We will only use your personal information for the purposes we have disclosed in our notice(s). If we need to use your personal information for an unrelated purpose, we will notify you. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. DATA SECURITY

While no data security system can fully protect personal information from unauthorized data breaches, Tekni-Plex, Inc. has implemented reasonable safeguards and controls, consistent with its legal obligations under CA and other local, state and federal laws. Tekni-Plex, Inc. is committed to: (i) seeking to safeguard all personal information that you provide to us; (ii) seeking to ensure that it remains confidential and secure; and (iii) taking all reasonable steps to ensure that personal privacy is respected. All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, Tekni-Plex, Inc. and third parties who need to know that information for the purposes identified in our notice(s).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you are no longer an employee or contractor of Tekni-Plex, Inc., we will retain and securely destroy your personal information in accordance with Tekni-Plex, Inc.'s record retention policies.

9. CHANGES TO THIS PRIVACY POLICY

As we strive to improve our practices, we may revise Tekni-Plex, Inc.'s Privacy Policy from time to time. This Privacy Policy is not a contract and we reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy. It is your responsibility to check this policy from time to time for any changes.