

Instant brands™

Political Activity Policy

Instant brands
Made for together.

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Purpose

Instant Brands Acquisition Holdings Inc. (including its subsidiaries, collectively “**Instant Brands**” or the “**Company**”) is committed to being a responsible corporate citizen wherever we do business and complies with all applicable laws, rules, and regulations regarding the use of Instant Brands’ funds, assets, and resources in connection with political activity. Accordingly, Instant Brands generally encourages its employees to:

- Take an active interest in fostering the principles of good government in the communities in which they live and work.
- Participate in permitted political activity in the communities in which they live and work, provided that such activity only occurs in an employee’s individual capacity and not on Instant Brands’ behalf or time, or with the use of any of Instant Brands’ funds, assets, or other company resources.

This Political Activity Policy provides employees with guidelines for engaging in political activity in the workplace.

Instant Brands’ Political Contributions

US federal law prohibits Instant Brands from making contributions or expenditures in connection with federal elections. Each state has additional laws, rules, and regulations governing political contributions in state and local elections which may or may not allow corporate contributions to candidates for state and local office.

As a result, it is Instant Brands’ policy to make no political contributions or use any of Instant Brands’ funds, assets, or other company resources to benefit any political:

- Candidates
- Parties
- Lobbyists
- Campaign committees including, but not limited to, separate segregated funds (also known as political action committees (“**PACs**”)).
- Special interest groups or organizations engaged in political fundraising or lobbying activities, including special interest groups organized under Section 527 of the US Internal Revenue Code (“**527 organizations**”).

Employee Political Contributions and Other Activity

Employees engaging in political activities agree to do so solely on their own behalf and not on Instant Brands’ behalf or time, or with the use of any of Instant Brands’ funds, assets, or other company resources.

Employees may not use any of Instant Brands’ funds, assets, or other company resources to directly or indirectly support any political:

- Candidates
- Parties
- Lobbyists
- PACs
- 527 organizations

Notwithstanding the foregoing paragraph, employees may make personal political contributions and participate in political activities of their own choosing during non-work hours, provided that such contributions and activities only occur in an individual and private capacity and not on Instant Brands' behalf or time, or while using any other company resources. Instant Brands will not reimburse any employee in any way for time or funds used for personal political contributions or activities.

An employee's personal, lawful political contributions and decisions not to make political contributions will not influence an employee's compensation, job security, or opportunities for advancement at Instant Brands.

Employees may not represent Instant Brands on policy issues except when it is part of their jobs to do so. Accordingly, if an employee personally participates in the political process, that employee may not:

- Implicitly or explicitly suggest or give the appearance in any way that the employee's personal view or position is one that is held or supported by Instant Brands by, for example:
 - using Instant Brands' stationery, email, telephones, computers, printers, or copiers in connection with an employee's personal political activities;
 - providing political candidates or organizations with access to Instant Brands' mailing lists, customer lists, employee lists, office space, telephones, computers, printers, copiers, or other Instant Brands resources; or
 - posting a hyperlink to a political candidate's or organization's website, social media, or email account on a website, social media, or email account owned or operated by Instant Brands.
- Allow the employee's employment by Instant Brands to be used in support of or against any political candidate, issue, or cause.

All lobbying activities, including without limitation participation in any trade groups or associations, that are conducted on Instant Brands' behalf must be approved in advance in writing by the Chief Legal Officer/General Counsel, and coordinated through the Legal Department.

Employees are reminded that Instant Brands maintains an Anti-Corruption Compliance Policy which is applicable to all US and international operating units. Any personal employee political contributions or activities must additionally comply with Instant Brands' Anti-Corruption Compliance Policy.

Administration of this Policy

The Legal Department is responsible for the administration of this policy. If you have any questions regarding this policy or questions about political activities in the workplace that are not addressed in this policy, please contact the Legal Department at Legal@InstantBrands.com.

Employees Covered Under a Collective Bargaining Agreement

The employment terms set out in this policy work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with Instant Brands. Employees should consult the terms

of their collective bargaining agreement. Wherever employment terms in this policy differ from the terms expressed in the applicable collective bargaining agreement with Instant Brands, employees should refer to the specific terms of the collective bargaining agreement, which control.

Conduct Not Prohibited by this Policy

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities and/or activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits, or terms and conditions of employment, forming, joining, or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or legally required activities.

Certification (If Not Certifying Electronically)

I certify that I have read and thoroughly understand the requirements of the Instant Brands Political Activity Policy (the "Policy"). As a condition to my membership on the Board or employment with Instant Brands, I agree to abide by the restrictions and other obligations set forth in the Policy. To the best of my knowledge and belief, neither I nor any director, officer, or employee of Instant Brands with whom I am associated is engaged in any activity which is in violation of any element of the Policy. I agree that if I become aware of any activity that might be considered a violation of the Policy, I will contact the Instant Brands Legal Department immediately.

Name

Date