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Introduction and Purpose

This employee hand book is intended to provide you with a general understanding of CW Ohio, Inc., personnel policies. The information in this hand book should be helpful in familiarizing you with our organization.

This handbook, however, cannot anticipate every situation or answer every question about employment. It is not an employment contract or a legal document. In order to retain necessary flexibility in the administration of policies and procedures, CW Ohio, Inc. reserves the right to change or revise policies, procedures and benefits described in this hand book, other than the employment-at-will provisions, whenever we determine that such action is warranted.

None of the following policies or standards of conduct are intended, nor shall they have the effect, of interfering or inhibiting any employee in the exercise of any right guaranteed or protected by law.

This handbook is not intended as a formal or exhaustive statement of employee rights and responsibilities, nor is it a contract of employment. This handbook is composed of general statements of our current policies, rules, procedures and benefits. We feel strongly that we must retain flexibility to meet future economic challenges. Accordingly, we reserve the right to amend, modify and/or eliminate any of these policies, rules procedures and benefits at any time at our sole discretion, *with or without prior notice*. On termination for any reason, you are only entitled to those benefits that are offered at the time your separation takes place. Any benefits offered in this handbook apply only so long as the handbook is current. They do not provide vested rights.

This handbook supersedes any previous oral or written provisions, descriptions or understanding of our policies, rules, procedures and benefits. Any variation from these policies will only be made upon written approval from the President of Company.

Equal Employment Opportunity Policy

We are an equal opportunity employer. It is our policy to provide equal employment opportunities to all qualified individuals regardless of race, color, creed, religion, national origin, sex (gender), age, disability, veteran status, genetic information, family medical history, sexual orientation, gender identity, or other status protected by law. If needed in order for an employee to be able to perform the essential functions of a job, we will provide reasonable accommodation to qualified employees with a known protected disability or for an employee's religious beliefs providing the accommodation does not cause undue hardship to CW Ohio, Inc, or cause a direct threat to health and safety as defined by the Americans with Disabilities Act or applicable state law.

Employment at Will

It is our goal to provide a positive work environment and solid economic foundation upon which all employees may build a future. However, CW Ohio, Inc, also recognizes that employees and management alike must sometimes initiate change. **In this regard it is expressly understood that your employment is “at will”. Thus, you retain the right to terminate your employment with us at any time for any reason and we retain a corresponding right to end the employment relationship at any time for any reason.**

Introductory Period

All new employees are in an introductory period during their first 90 days of employment. During the introductory period, CW Ohio, Inc evaluates the employee's work performance, including attendance and other work-related factors. CW Ohio, Inc. is the sole judge in making all evaluations. We will continue to evaluate the work performance of each employee who completes the introductory period.

Employees should use this introductory period to learn about the company in order to understand what we expect of our workers and understand the benefits of being an employee.

Completion of the introductory period does not modify the “at will” nature of employment.

Employee Service Credit

“Length of service” refers to the length of time that our employee spend as active full-time or part-time employees with CW Ohio, Inc. Service begins on the day you become a regular full-time or part-time employee.

Length of service may be used in determining certain employee benefits, such as time-off benefits. Employees will not lose credit for service with the Company provided their last day of service was within 30 days of again becoming an active employee. Human Resource will discuss this issue with any rehired employee upon hire.

Policy Against Harassment

It is the policy of CW Ohio, Inc., to preserve the integrity of work relationships so that all employees are able to work in a setting free from all forms of harassment.

(a) Harassment Defined

Harassment is verbal, non-verbal, physical or any other conduct that is offensive or shows hostility toward an individual’s race, color, religion, gender (female or male), national origin, age, disability, or veteran status and that: (1) has the purpose or effect of creating an intimidating, hostile, or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual’s work performance; or (3) otherwise affects an individual’s employment opportunities.

Some examples of prohibited conduct, if directed at a person’s protected status, include foul language, jokes, slurs, derogatory comments, negative stereotyping, threatening or intimidating acts, or accessing, obtaining, posting or circulating offensive written or visual material, including electronic communications. Additional examples of harassment include unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. These examples are for purposes of illustration and are not meant to a complete list of all objectionable behavior.

(b) Employees are Expected to Report Harassment and/or Discrimination

If an employee feels that someone’s conduct is harassing or improperly offensive, the employee should promptly and firmly tell the offender that the behavior is unwelcome. Although not

required, doing so places the offender on notice that someone considers his/her conduct inappropriate.

Any employee who believes he/she has been subjected to harassment or offensive conduct or any employee who witnesses a violation of this policy will immediately report the matter, either verbally or in writing, to his/her supervisor. If you are not comfortable discussing the matter with your supervisor or you believe it would be inappropriate or ineffective to contact your supervisor about the situation, you should immediately report the incident to the Human Resource Manager or to the Corp. Chief Financial Officer or Corp. Human Resource at 541-826-2911 or any other management employee. CW Ohio, Inc. requests that the employee's complaint include the details of the incident or incidents, the names of the individuals involved, and the names of any witnesses. Supervisors/Managers will refer all harassment complaints to the Human Resource Manager or the appropriate level of management. It is the employee's responsibility to report the violation immediately and not to wait until conditions become intolerable or unacceptable.

(c) All Reports of Harassment Will Be Investigated

CW Ohio, Inc. will immediately investigate all reports of harassment and take prompt corrective action to rectify any harassment of discrimination found to have taken place. Appropriate action will also be taken to deter any future inappropriate conduct. In determining the appropriate corrective action, the company will consider all of the circumstances, including the nature of the harassment and the context in which events occurred. Appropriate corrective action may include discipline of the offender, up to and including discharge for the first offense.

(d) Retaliation Will Not Be Tolerated

Our policy prohibits retaliation against anyone who reports harassment or is a witness in a harassment investigation. Therefore, individuals who follow our reporting expectation, who lodge a good faith complaint, and/or who participate truthfully in a company investigation will not be retaliated against for reporting harassment or participating in the investigation. Anyone who is found to have retaliated against an individual for making a complaint of harassment or for participating in an investigation of a harassment complaint will be subject to discipline, up to and including discharge.

(e) Confidentiality

While the company cannot promise complete confidentiality due to the need to investigate, information about any complaint will be treated as confidentially as possible, consistent with a proper and thorough investigation and responsive action. Generally, this means confidential

information will be shared only on a need-to-know basis. The employee who reported the harassment will also be informed to the extent possible that action has been taken to resolve the situation.

Open Door Policy

CW Ohio, Inc. believes it is extremely important that you have an effective means of addressing work-related issues. We strongly believe that by working together, we can resolve most any questions or concern that may arise. If you have a problem or concern, we want you to tell us. For matter pertaining to harassment of offensive concern, please also refer to procedures contained in our “Policy Against Harassment”.

- Please use the following procedure in expressing your concerns.
 - ✓ First, talk to your supervisor. Your supervisor is your principal contact with management. Supervisors have a considerable amount of technical knowledge and experience in the industry. Our supervisors are trained to deal with problems. They are very familiar with CW Ohio, Inc, policies and will handle matters in a confidential manner. If you are uncomfortable or unable to discuss an issue with your supervisor, you may ask to meet with the manager of the HR Department.
 - ✓ You and your supervisor can satisfactorily resolve most problems. You should first present any questions or concerns about policies, procedures, equipment, safety or other matter to your supervisor.
 - ✓ If you are not satisfied with the answer from your supervisor or you feel that you cannot discuss the issue with your supervisor, you should talk to the manager of the HR Department.
- After taking the steps described above, submit any issue remaining unsolved to the Corp. Human Resource 541- 826-2911. He or she will carefully review the facts, consider your position and make a final and binding decision.

CW Ohio, Inc. prohibits retaliation against any employee for exercising his/her right to bring issues to the attention of management.

Performance and Pay Reviews

CW Ohio, Inc, expects all employees to perform their job duties in a safe and productive manner. Each employee's supervisor will use an ongoing performance evaluation to accomplish the following objectives.

- Employees will understand what job duties they are expected to perform and the performance standards they are expected to meet.
- Employees will be aware of whether they are meeting or exceeding the performance standards and will have an opportunity for open communication and interaction with their supervisor about their job performance.
- Employees who meet or exceed the performance standards will have the opportunity for training and career development.
- Employees who are not meeting the performance standards will be subject to coaching and discipline, as we deem appropriate.

Every employee is responsible to participate actively in the ongoing performance appraisal process with his or her supervisor.

All job promotions, assignments and transfers are subject to the reinstatement rights of an employee who is on a protected leave of absence under federal or state law. In some cases, the employee's job reinstatement rights may extend for a long period of time and can later affect several people in a line of progression. For this reason, all job promotions, assignments and transfers are considered temporary until the employee on a protected leave of absence returns. As provided by federal and state laws, such employee may have the right to a promotion, assignment or transfer or may choose to decline job reinstatement.

Family and Medical Leave

The federal Family and Medical Leave Act (FMLA) entitles eligible employees to take up to 12 weeks of unpaid leave in a 12-month period for the reasons below:

- Birth and care of your newborn child within 12 months after the date of birth;
- Placement of a child with you for adoption or foster care within 12 months after the date of placement;
- To care for your spouse, child or parent with a serious health condition;
- When your own serious health condition prevents you from performing one or more of the essential functions of your job;

- When your spouse, child or parent who is in the Armed Forces (including the National Guard or Reserve) has an urgent need for you to take time off from work for a reason related to their covered active duty or impending call to covered active duty; or
- To care for a military servicemember (or veteran within the past five years) with a serious injury or illness incurred on active duty, when you are the spouse, child, parent or next of kin of the servicemember.

The company has designated a rolling 12-month period measured backward from the date an individual uses any FMLA leave as its 12-month period in which the 12 weeks of leave entitlement occurs.

Medical insurance continues during FMLA leave on the same basis as if you had continued to work. In some cases, you may be able to use paid leave (such as accrued vacation, sick pay, etc.) at the same time as FMLA. The company's FMLA policy contains more detailed information about your rights and responsibilities. You have been provided with a copy of the policy. If you have misplaced your copy, we encourage you to obtain another copy of the policy from Human Resource.

You should also refer to the FMLA poster located in Human Resources. Among other things, the company policy explains our requirements for advance notice before leave the payments and procedures you need to follow to continue your medical insurance, periodic call-ins during leave, medical certification of a serious health condition, and fitness-for-duty certification prior to returning to work from leave for your own serious health condition. You may obtain leave request forms from Human Resource.

Fitness-for-Duty

This fitness-for-duty policy is in coordination with other company policies that are designed to provide a safe and efficient workplace.

Worker's Compensation Physical Exams

It is our objective to return an employee who has suffered a work-related injury or illness to work as soon as possible. The diagnosis and treatment by a physician is an essential part of the return-to-work objective. We expect employees to cooperate in taking physical exams that are authorized by state workers' compensation law.

Return from Leave

An employee who takes a leave of absence due to his or her own serious health condition may be required to submit a fitness-for-duty medical certification by a health care provider prior to returning to work. More details about this requirement are found in the "Leaves of Absence" policy in this handbook.

Reasonable Accommodation

If needed in order for an employee to be able to perform the essential functions of a job, CW Ohio will provide reasonable accommodation to a qualified individual with a disability as defined by federal or state law unless it creates an undue hardship or causes a direct threat to health and safety. An employee who requests reasonable accommodation is required to provide the HR Department with a physician's medical certification explaining the employee's limitations, stating what accommodation is requested and why it is a medical necessity.

Dress and Grooming Standards

It is in CW Ohio's best interests to present a professional image to our customers, suppliers and the public. Therefore, while we have no formal dress code, we expect employees to dress in a non-offensive manner consistent with good hygiene, safety and good taste.

CW Ohio expects employees whose jobs require them to come in contact with customers, suppliers or the public to wear apparel consistent with that worn by persons dealing with the public in the community in similar capacities.

Jewelry and Hair Length

Employees who work on or near machinery and equipment cannot wear loose clothing, necklaces, chains, bracelets or other jewelry, which could become caught in the equipment. Likewise, long hair or beards regardless of sex, must be protected by a cap, hairnet, hair clip etc. or keep hair or beard trimmed so it does not extend beyond top of shoulders when entering all production, maintenance, assembly and storage areas to prevent it from becoming caught in equipment.

Confidentiality Policy

In order for our staff to conduct company business and properly administer our own personnel procedures, we must gather and maintain certain private information. The purpose of this Confidentiality Policy is to set forth guidelines with regard to the collection, maintenance, use and disclosure of confidential information. All employees share the responsibility to ensure that proper security and confidentiality are maintained. Report any breach promptly to your supervisor or the HR Department. Anyone who violates this policy will be subject to disciplinary action and possible legal recourse.

CW Ohio property includes not only tangible property such as desks and computer terminals, but also intangible property such as information and data that is sent, received, created, viewed or stored on our equipment, networks, websites, databases, or other communication or storage

mediums. Of particular importance are proprietary information and confidential information. Proprietary information includes all information exclusively owned or controlled by us. Confidential information is any company information that is not generally known to the public or our industry. Customer lists and files, production information, personnel files, employee medical information, computer records, financial and marketing data, formulas and trade secrets are examples of confidential information.

General Policies

- You may not disclose or use proprietary or confidential information except as your job requires. You also may not disclose or use any proprietary or confidential information that you obtained during the course of your employment with any previous employer.
- Do not discuss confidential information with anyone, including coworkers, customers and individuals outside the company, except as necessary to carry out assigned duties. Take extra precautions when you are in areas where someone may overhear your discussion or observe your work. Clear your desktop of any confidential information before leaving your desk. If you need to leave your computer during the workday, you should use the “lockout” feature which will require you to enter a password when you return. Where appropriate, clearly mark files as “Confidential.”
- Computers regularly used by an individual should not be used by other staff without permission.
- Mail marked “confidential” should be opened only by the person to whom it is addressed.
- Although we wish to respect employees’ privacy, there may be times when in order to prevent or investigate claims of harassment, theft or other wrongdoing, an authorized company representative may monitor phone calls, regular mail and electronic communications sent, stored, created, viewed or received on company equipment. This may include, but is not limited to, e-mails, text messages, instant messages, and Internet postings. Please be aware that communications that are sent, stored, created, viewed or received on company computers are the property of the company and are subject to our policies, including the policy against harassment. Although *unauthorized* access to an employee’s phone calls, regular mail, or electronic communications violates this confidentiality policy, we reserve the right to monitor these items with the authorization of the President of Company.
- Use only honest, legitimate means to collect information. Whenever practicable, obtain the information directly from the individual concerned.
- Refer all inquiries from the press about our operations or employees to the President of Company.

- When in doubt about the release of information, check with your immediate supervisor. Never be intimidated into releasing the information when there is a question.

Outside Requests for Information About our Employees

Please direct **all** written requests, telephone calls or other inquiries regarding information about a current or former employee to the HR Department. The HR Department is the only entity authorized to release information. Guidelines for release of the information are set out below.

- We will not release employee data to individuals or organizations outside of the company without the employee's authorization. The only exception is when the disclosure is compelled by court order, judicial or administrative process or a specific provision of law. Prior to release, the person requesting the information must present the appropriate court document or agency authority.
- An employee who desires us to release information to an outside individual or organization (e.g., financial and employment information released to a bank or loan agency in support of the employee's loan application) must sign a release and waiver before we release the information. The employee's spouse or relative cannot give the waiver on behalf of the employee absent a court order.
- When other employers ask for references, we will limit information regarding former employees to dates of employment and job(s) held. Any former employee who wants to release additional information about his or her employment must sign a request and waiver.
- If you respond to a verbal or telephone request for information, record what information you released, to whom and for what purpose.

Information about our Business Operations

In managing the operations of our business, certain staff members become privy to sensitive information about the business, our customers and our employees. This information must remain confidential both internally (within the company) and externally (outside the company, including spouses and family members). Do not discuss it with others beyond what is required to perform your job unless you are given specific authority to do so.

Medical Information

All medical information regarding our employees is strictly confidential. This includes but is not limited to workers' compensation claims and treatments, enrollments and claims for health and welfare benefits and results of drug and alcohol tests. Except as outlined below, no release is permitted without specific authorization from the person who is the subject of the medical information.

- Employees' personnel files will *not* contain medical information. Documents containing medical information will be maintained in a separate file, marked "Confidential" and stored in a locked cabinet or drawer or in a secure computer file, as appropriate. We will treat the contents of the file as a confidential record as required by law.
- Supervisors and managers who have information regarding an employee's medical restrictions and limitations as a result of a return-to-work program must maintain the confidentiality of the medical information. They must use the information only to accommodate the employee's work assignment and duties or to administer first aid or emergency treatment.

Confidentiality is an important part of our job. Please feel free to talk to your supervisor or the human resources manager if you have confidentiality concerns.

Proprietary Information

The Company has a goal of serving our customers through technical innovation and marketing. The success of the Company depends to a large extent on the creative talents of our employees and sharing information with employees. The Company requires that:

- Employees avoid conflicting outside activities;
- The Company owns exclusive rights to ideas, works, and inventions that relate to Company business;
- Employees cannot disclose proprietary information without specific permission from the Company.

No Solicitation Policy

We have established a *no solicitation* rule to maintain and promote efficient operations and security.

No employee can solicit or promote support for any cause or organization during his or her working time. In addition, no employee can solicit another employee during that employee's working time. Working time is defined as all time an employee is required to be on company premises, on duty or at a prescribed workplace, including preparation time, opening and closing times and required meetings.

This policy does not restrict employee activity during lunch or rest periods or before or after working time.

Distribution of literature relating to any cause or organization is not permitted in working areas at any time. Such literature may be shared in non-work areas such as the lunch room or the parking lot. Nonemployees are not allowed to solicit or distribute written material for any purpose on company property, including parking areas.

Personal Relationships

A familial relationship among employees can be an asset but can also potentially create an actual or at least a potential conflict of interest in the employment setting, especially where one relative supervises another relative. Accordingly, all parties to any type of intimate personal relationship must inform management.

If two employees marry, become related, or enter into an intimate relationship, they may remain in a reporting relationship. However, if they are in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual, the Company will require an executive above the level of the individual who can affect the compensation or other term or condition of employment of the other individual to finally approve any change in compensation, or any significant positive or negative employment action, prior to implementation to avoid an actual conflict of interest.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

An employee who feels there may be a circumstance where a violation of this personal relationship policy could occur, should report the situation to the **HR Department, President, or Corporate CFO or HR at 541-826-2911**. If properly reported, we will endeavor to reassign the employee to an available position the employee is qualified to perform that avoids the violation of the policy. In situations where a supervisor and coworker's relationship violates this policy, the supervisor, coworker and the company can mutually agree which person will be reassigned. If reassignment is not possible, the supervisor, coworker and company can mutually agree which person is subject to termination.

Any person who has not reported the situation prior to discovery of a violation is subject to discipline up to and including discharge.

Conflicts of Interest

Each person employed by CW Ohio, Inc. shall not engage in any activity if it will:

- Adversely affect on-the-job work performance,
- Create a conflict with the business interests and purposes of the company; or
- Have a negative impact on the business or reputation of the company, its product or other company employees.

Electronic Data Policies:

Computers and Software License Agreements

Internet and E-mail

Telecommunications

The Company provides computers and related software, internet and e-mail access, and telecommunications equipment, for the purpose of allowing employees to conduct Company business. These Company facilities should generally be used for business purposes only.

1. Computers and Software License Agreements. All Company provided computers, computer files, and software furnished to employees are the property of the Company, and intended for business use only. Employees should not use passwords, access a file, or retrieve any stored communication or data without authorization. To insure compliance with this policy, the Company reserves the right to monitor and review all information stored in computers.

The Company purchases and licenses the use of various computer software for business purposes. It does not own the copyright to this software or its related documentation. Unless authorized by the software developer, the Company does not have the right to reproduce such software for use on more than one computer. Employees should not install or share software without proper authorization.

Software should be used according to the software license agreement. The Company prohibits the illegal duplication and distribution of software and its related documentation. Any employee who learns of a violation of this policy should notify their immediate supervisor or any member of management upon learning of the violation.

All information stored in Company computers is considered to be the proprietary and confidential information of the Company, and may not be removed from the computers or disclosed to any person outside the Company except in strict conformance with Company policy. If your employment with the Company terminates for any reason you are not allowed to remove or delete any program, data, or other material from the Company provided computer.

Company computers and related equipment should not be used to store, access or generate any personal information. All software, files, and data installed or entered into a Company computer or related equipment becomes the property of the Company when installed or entered. The Company reserves the right to monitor all computers and to retrieve any and all information stored in a computer. This includes any information deleted from an individual computer which is retrievable in that computer's hard drive, the Company's server, the Company's internet or e-mail provider's server, or any other system in which such information may be saved. If you use any Company computer for any personal purpose, you cannot expect privacy.

2. Internet and E-mail Usage. The Company provides access to the internet and e-mail for the purpose of allowing you to perform your work for the Company. For purposes of this policy e-mail means all electronic mail transmissions, instant messaging or real time transmissions, and any other form of electronic correspondence. The following guidelines are established to help insure responsible and productive usage:

- All internet and e-mail usage is limited to job-related activities. Except as specifically authorized herein, personal use of the internet or e-mail is not permitted.
- All electronic data composed, transmitted or received via the Company computer system is part of the official records of the Company and, as such, may be subject to disclosure to third parties. Consequently, employees should always insure that the business information contained in internet or e-mail messages and other computer transmissions are accurate, appropriate, ethical, and lawful.
- All equipment, services and technology provided to access the internet or e-mail remain at all times the property of the Company. The Company reserves the right to monitor all internet and e-mail traffic, to retrieve and read any data composed, sent, or received through Company internet or e-mail lines, or stored in Company

computers. Employees have no expectation of privacy for e-mail or other internet usage.

- Incoming and outgoing business-related e-mail is the equivalent of a business letter. Employees are responsible for maintaining business etiquette and professional standards in communicating via e-mail.
- Employees should not compose, transmit, access or receive communications via the internet or e-mail which contain discriminatory, obscene, threatening, harassing, intimidating, disruptive or other similar types of communications which may reasonably be considered such to other employees or other persons outside the Company.
- The unauthorized use or disclosure of another employee's code or password without express authorization of management is strictly prohibited.

Remember, when you use the internet or e-mail, you are acting as a representative of the Company and your communications reflect upon the Company. You should at all times observe proper e-mail etiquette and you should not communicate anything via this technology which would reflect badly upon the Company.

Any use of the internet or e-mail in violation of these policies is strictly prohibited and will lead to immediate discipline, up to and including termination.

Subject to all of the provisions hereof, employees are permitted to use e-mail and the internet for personal use before and after work, during lunch breaks and in the event of a personal or family emergency.

3. Telecommunications. Employees may make local phone calls for personal business provided they do so only on an occasional basis, and the local calls do not interfere with the employee's work activity. Long distance phone calls are not permitted, except in the case of an emergency. Employees shall reimburse the Company for any personal long distance calls.

If the Company provides cell phones to employees, they may be used for business purposes only, except in case of emergency. You will be required to reimburse the Company for any personal use of cell phones, and the Company reserves the right to monitor records of cell phone usage.

Violations of any policies set forth above may subject employees to discipline, up to and including termination.

Work-Related Searches and Monitoring

In order to enforce CW Ohio, Inc.'s drug and alcohol policy, stop theft, prevent workplace violence, prevent harassment and otherwise protect the interests of the company, our customers and our employees, we may use searches, video or other surveillance if necessary.

It is in your best interest not to bring items on company property that you do not wish someone else to discover. We reserve the right to make an unannounced search of company property or of personal property that you bring onto company premises. Company property may include, but is not limited to, desks, file cabinets, computer files, e-mail, text messages, instant messages, online postings, telephones, lockers, work areas, toolboxes and work vehicles. Personal property that you bring onto company premises may include, but is not limited to, jackets, briefcases, purses, lunch boxes, packages and personal vehicles.

To the extent possible, we will conduct searches in a manner that respects your dignity and privacy. We will not force you to consent to a physical search of your personal property; however, not consenting to a search may result in disciplinary action up to and including discharge. If you have concerns about the manner in which a search or surveillance was conducted, you should immediately contact the HR Department or the President.

Drug and Alcohol Policy

CW Ohio, Inc. has a commitment to its employees, customers and the community to provide a drug-free and alcohol-free working environment. We have a zero tolerance for substance abuse in the workplace. We expect employees to be in a suitable mental and physical condition to perform their assigned job duties satisfactorily at all times. In addition, we have an obligation to our employees to ensure safe working conditions. To meet that obligation and to further our commitment to promote high standards of employee performance, productivity, health, safety and reliability, CW Ohio, Inc. has established a Drug and Alcohol Policy.

Safety Program

This safety program policy is in coordination with other company policies that are designed to provide a safe and efficient workplace.

We hold the safety, health and welfare of our employees in high regard. We constantly strive to maintain a safe and healthy work environment. We accomplish this by adhering to safe operating practices and complying with all federal, state and company safety standards.

All levels of this company, including top management, department heads, supervisors and hourly workers, are given specific safety responsibilities. It is mandatory that all employees be familiar with the safety requirements of their position and that they work safely at all times.

Each employee at time of hire and as needed thereafter is provided general safety, health and job specific training. Personal protective equipment such as safety glasses, hearing protection and respiratory protection must be worn as required.

Workers' Compensation

On-the-job injuries are covered by our Workers' Compensation Insurance Policy, which is provided at no cost to you. If you are injured on the job, no matter how slightly, report the incident immediately to your Supervisor. Failure to follow Company procedures may affect your ability to receive Workers Compensation benefits.

This is solely a monetary benefit and not a leave of absence entitlement. Employees who need to miss work due to a workplace injury must also request a formal leave of absence. See the Leave of Absence sections of this handbook for more information.

Workplace Violence

CW Ohio, Inc. is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Company and personal property.

We do not expect you to become an expert in psychology or to physically subdue a threatening or violent individual. Indeed, we specifically discourage you from engaging in any physical

confrontation with a violent or potentially violent individual. However, we do expect and encourage you to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Company policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or Supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; demonstrating a propensity to behave and react irrationally

Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee **WILL NOT BE TOLERATED**. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons onto Company premises.

Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom you feel comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede our ability to investigate and respond to the complaints. All threats will be promptly investigated. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Company determines, after an appropriate good faith investigation, that someone has violated this policy, the Company will take swift and appropriate corrective action.

If you are the recipient of a threat made by an outside party, please follow the steps detailed in this section. It is important for us to be aware of any potential danger in our offices. Indeed, we

want to take effective measures to protect everyone from the threat of a violent act by an employee or by anyone else.

Personnel Records

The accuracy of each employee's personnel records is essential for the proper handling of many issues of importance to you as well as to us. It is your responsibility to promptly notify the HR Department of any of the following personal data changes:

- Mailing address
- Physical address/location
- Home/message phone number
- Person and phone number to call in the event of an emergency
- Any official name change
- Marital status change (marriage, divorce or separation)
- Any change in dependent status (birth, marriage, death or loss of legal custody)
- Insurance beneficiary
- Military status

Forms to update your personnel records are available from the HR Department. Changes may be made in person at the HR Department during regular business hours. Failure to keep your personnel records up to date can adversely affect your work opportunities (e.g., if we are not able to contact you) and the eligibility of you and your dependents for employee benefits.

Visitors

Visitors are not allowed on Company property during working hours without permission from management. This policy applies to family, friends, vendors, representatives of fraternal, religious, charitable, profit or non-profit organizations, and anybody else including off-duty employees. If you have a specific need for a visitor to enter Company property, obtain prior approval from management.

Visitors must be accompanied by an on-duty employee, except in special cases as determined by management. When accompanying a visitor, the employee is responsible for the visitor's safety and actions.

Weapons Policy

For the safety of our employees, it is expressly forbidden to have at or bring to the workplace, including Company parking areas, weapons or firearms of any type. Except where allowed by state law, including in Ohio pursuant to Ohio Senate Bill 199. Violations of this policy will result in the appropriate discipline, up to and including discharge.

Bulletin Boards

Important notices and items of general interest are continually posted on bulletin boards. Review the Company bulletin boards frequently. This will assist you in keeping up with what is current at CW Ohio, Inc. Our bulletin boards are for company use only. Defacing or removing notices are grounds for discipline.

Personal Cell Phones

Due to safety concerns and the risk of distraction, personal communication devices, (mobile phones, pagers, etc.) are not to be used in the company production facilities except for approved work related business.

Personal communication devices may only be used in your personal vehicles, lunch room or outside the facilities during break or meal periods or before and after shift. The company is not responsible for damage or theft of any personal items from your vehicle.

Business use of cell phone is only permitted in non-production jobs with the approval of management. You should not use your cell phone or similar devices to receive or place calls, text messaging, surfing the Internet, check phone messages, receive or respond to email while working in production. No exceptions.

Messages/Telephones

Telephones are for Company business. The Company realizes that at times, essential communications must occur. During breaks and meal periods, local calls may be made from the

office phones with a supervisor's permission. Additional phones are available for local calls in the lunchroom.

Please ask family and friends etc., not to call during working hours. In general, the Company will not take messages. If an emergency situation exists, the affected employee will be notified immediately. The caller will be asked to identify the nature of the emergency.

Camera Phones/Recording Devices

Due to the potential for issues such as invasion of privacy, sexual harassment, and loss of productivity, no employee may operate a camera phone on company property or while performing work for the Company. For the purposes of this policy, a camera phone includes any telephone, walkie talkie or other voice transmission device with the capability of capturing photographic or visual images, regardless of whether or not this function is selected or used.

The possession or use of tape recorders, dictaphones or other types of voice recording devices anywhere on Company property, including to record conversations or activities of other employees or management, or while performing work for the Company, is also strictly prohibited, unless the device was provided to you by the Company and is used solely for legitimate business purposes.

Parking

Areas are provided for parking employees' automobiles. The Company asks that all vehicles be parked either in those designated areas or in public areas outside of company property.

The Company has no responsibility for employees' personal items left on Company property. Please store unnecessary items at home or properly secured in your automobile.

Lunchrooms/Vending Machines

Lunchrooms and vending machines are provided for employee use. Please help to maintain these facilities in a sanitary and pleasant condition. Use the proper receptacles for garbage and cigarettes. Do not abuse the vending machines. They belong to another business. If the

machines are vandalized, they'll be removed. Please immediately report any lunchroom needs for cleanup, garbage disposal, or vending machine repair.

Smoking

This is a restricted smoking facility, you may smoke in designated areas only.

Purchase of Company Products

The Company may sell product which they manufacture to employees for their own personal use. These purchases can be paid for by cash, check, money order, or payroll deduction. Purchases of products will be handled by invoicing through the Sales Department of either company. If you would like to purchase products, please contact your supervisor for purchasing information.

Publicity/Statements to the Media

All media inquiries regarding the Company and its operation must be referred to the President. Only the President is authorized to make or approve public statements pertaining to the Company or its operations. No employees, unless specifically designated by the President, are authorized to make those statements. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of the Company must first obtain approval from the President.

Operation of Vehicles

All employees authorized to drive Company-owned or leased vehicles or personal vehicles in conducting Company business must possess a current, valid driver's license and an acceptable driving record. Any change in license status or driving record must be reported to management immediately.

A valid driver's license must be in your possession while operating a vehicle off or on Firm property. It is the responsibility of every employee to drive safely and obey all traffic, vehicle safety, and parking laws or regulations. Drivers must demonstrate safe driving habits at all times.

Firm-owned or leased vehicles may be used only as authorized by management.

Business Expense Reimbursement

Employees may be reimbursed for reasonable approved expenses incurred in the course of business. These expenses must be approved by the President and/or the Controller, and may include air travel, hotels, motels, meals, cab fare, rental vehicles, or gas and car mileage for personal vehicles. All expenses incurred should be submitted to the Accounting department along with the receipts in a timely manner.

Employees are expected to exercise restraint and good judgment when incurring expenses. You should contact your Supervisor in advance if you have any question about whether an expense will be reimbursed.