

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
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WPG EMPLOYEE HANDBOOK			Revision No.	5
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Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 1 of 103

Table of Contents

SECTION 1: INTRODUCTION	4
1.1 THE PRESIDENT'S MESSAGE	4
1.2 IMPORTANT NOTICE TO ALL EMPLOYEES.....	5
1.3 EMPLOYEE CLASSIFICATIONS	6
 SECTION 2: EMPLOYMENT POLICIES	 8
2.1 NONDISCRIMINATION/ANTI-HARASSMENT POLICY AND COMPLAINT PROCEDURE	8
2.2 NONDISCLOSURE / CONFIDENTIALITY	11
2.3 TRADE SECRETS	11
2.4 RESIGNATION	12
2.5 PROBATIONARY EMPLOYMENT PERIOD.....	12
2.6 BASIC SAFETY EQUIPMENT	14
2.7 DRIVING RULES ON COMPANY TIME	15
2.8 DRESS CODE AND PERSONAL HYGIENE.....	16
2.9 LOCKERS.....	16
2.10 USE OF PERSONAL MUSIC DEVICES	17
2.11 FIREARMS AND OTHER WEAPONS.....	17
2.12 PERSONNEL INFORMATION AND PRIVACY	18
2.13 PERSONNEL DATA CHANGES	18
2.14 EMPLOYER INFORMATION AND PROPERTY	19
2.15 BUILDING ACCESS POLICY.....	19
2.16 CANDLES.....	21
2.17 HIRING STUDENTS UNDER 18 YEARS OLD AND RELATIVES OF EMPLOYEES	21
2.18 PERSONAL PACKAGES	22
2.19 CONFLICT OF INTEREST AND OUTSIDE EMPLOYMENT STATEMENT.....	22
2.20 ATTENDANCE POLICY	24
1. Work Hours.....	24
2. Time Clock.....	25
3. Being Tardy is Prohibited	26
4. Break Periods	26
2.21 AUTHORIZED ABSENCES.....	26
1. Authorization Required.....	26
2. Anticipated Absences – Advance Notice.....	26
3. Being Tardy is Prohibited	26

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 2 of 103

4. Unanticipated Absences – Notice Requirements	27
5. Three Consecutive Days of Unauthorized Absence	27
6. Leave Without Pay & Absent Without Pay	28
7. No Simultaneous Use of Multiple Paid Leaves	29
2.22 SUBSTANCE ABUSE POLICY	29
2.23 PRESCRIPTION MEDICATIONS	30
2.24 THE EVALUATION PROCESS.....	31
2.25 TELEPHONES, CELL PHONES AND OTHER DEVICES	32
2.26 SMOKING	33
2.27 EATING, DRINKING AND CHEWING	33
 SECTION 3: STANDARDS OF CONDUCT.....	 35
3.1 REPORTS OF WRONGDOING (WHISTLEBLOWING).....	36
3.2 WORKPLACE THREATS AND VIOLENCE.....	37
3.3 COMMITMENT TO A SAFE WORKPLACE	38
3.4 SAFETY RULES MUST BE FOLLOWED.....	39
3.5 COMPUTER AND ELECTRONICS ACCEPTABLE USE POLICIES	41
3.6 BUSINESS RELATED CELL PHONE USAGE	49
3.7 SOCIAL MEDIA POLICY AND GUIDELINES	52
 SECTION 4: WAGE AND SALARY POLICIES	 54
4.1 PAY PERIODS & PAY CHECKS	54
4.2 PAY ADVANCES	54
4.3 LOANS.....	55
4.4 OVERTIME.....	55
4.5 FINAL PAY	56
 SECTION 5: LEAVE BENEFITS.....	 57
5.1 PAID HOLIDAYS.....	57
5.2 VACATION PAY.....	58
5.3 PERSONAL/SICK LEAVE	59
5.4 EXTENDED ILLNESS LEAVE BANK	61
5.5 FAMILY AND MEDICAL LEAVE ACT (FMLA).....	62
5.6 MATERNITY LEAVE	67
5.7 MILITARY LEAVE	68
5.8 FUNERAL LEAVE.....	69
5.9 JURY DUTY & WITNESS DUTY	69
5.10 WEDDINGS.....	69
5.11 WORKER'S COMPENSATION/ON-THE-JOB INJURY	69
5.12 OTHER LEAVES OF ABSENCE.....	70

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 3 of 103

SECTION 6: HEALTH CARE RELATED BENEFITS AND SERVICES72

6.1 HEALTH INSURANCE.....	72
6.2 FLEXIBLE SPENDING ACCOUNT (FSA) PLAN.....	72
6.3 EMPLOYEE ASSISTANCE PROGRAM (EAP).....	72
6.4 EMPLOYEE PRIMARY HEALTHCARE BENEFIT.....	73

SECTION 7: OTHER COMPANY BENEFITS AND SERVICES74

7.1 PROFIT SHARING TRUST/401(K).....	74
7.2 LIFE INSURANCE.....	74
7.3 WAGE DISABILITY INSURANCE.....	75
7.4 USE OF COMPANY FACILITIES AND EQUIPMENT	75
7.5 PERSONAL PURCHASES.....	76
7.6 EMPLOYEE ACTIVITIES	77


SECTION 8: EMPLOYEE COMMUNICATIONS.....78

8.1 SOLICITATION POLICY	78
8.2 COMPANY NEWSLETTER.....	78
8.3 QUESTION/SUGGESTION BOX	78

SECTION 9: COMPLAINT RESOLUTION/GRIEVANCE PROCEDURE .79

SECTION 10: DRUG AND ALCOHOL TESTING POLICY81

SECTION 11: PRIVACY PRACTICES FOR PROTECTED HEALTH INFORMATION.....96

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 4 of 103

SECTION 1: INTRODUCTION

1.1 THE PRESIDENT'S MESSAGE

I want all Wood's Powr-Grip employees to feel proud that they work at this great company. We make the best vacuum-lifting products in the world, and each employee has a key role in that. It's an awesome responsibility each of us shares, to earn and have the trust of our customers. For 60 years, we've been the industry leader in an industry my grandfather pioneered, and we lead because our objectives are clear.

We need to make sure our products will enhance the **safety** of professionals who use them. It's our highest priority, without question. Glass installation and glass fabrication are some of the world's most dangerous professions, each carrying the risk of serious bodily harm. Any defect in a vacuum-lifting product could bring about a tragic result, and we must guard against that.

All our tools and equipment must be manufactured to the highest **quality** standards, from the engineers who create innovative designs to the shipping staff who move the finished products out the door — and everyone in between.


You can't be the best in your industry if you can't put your great products in the hands of customers. That's why WPG is driven to ensure prompt **delivery** of our tools and equipment. We continually improve our manufacturing processes across all departments, to make manufacturing more **cost**-efficient. We guarantee our products and make them reliable, for the best value. Lastly, we make sure each customer has the right tool or equipment to match the job.

WPG would never be able to meet all these objectives without dedicated employees. That's why we've made a wide-ranging commitment to you:

- We're committed to making sure you are treated with dignity and respect.
- We're committed to providing you with safe working conditions.
- We're committed to providing you with excellent compensation and offering you programs that promote personal growth and involvement.
- We're committed to making sure there is free, open and direct communication between you and management.

All of us at Wood's Powr-Grip — including myself and the other members of the Wood family who work here — look forward to working with you every day!

— Bryan Wood

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 5 of 103

1.2 IMPORTANT NOTICE TO ALL EMPLOYEES

Whether you have just joined our staff or have been at WPG for a while, we are confident that you will find our company a dynamic and rewarding place to work and we look forward to a productive and successful association. We consider the employees of WPG to be one of its most valuable resources. This Employees Handbook has been written to serve as the guide for the employer/employee relationship. This Handbook must be returned upon your departure from WPG.

KEEP THE FOLLOWING THINGS IN MIND ABOUT THIS HANDBOOK:


First, it contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice to you, you should address your specific questions to your supervisor or Human Resources. Neither this handbook nor any other Company document confers any contractual right to remain in the Company's employ, either express or implied. Nor does it guarantee any fixed terms and conditions of your employment. During your probationary period, you may be terminated at any time, with or without cause and without prior notice by the Company, or you may resign for any reason. No supervisor or other representative of the Company, except the CEO, has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above. Any such agreement with the CEO must be an individual agreement in writing and signed by you and the CEO.

Second, the procedures, practices, policies, and benefits described here supersede all prior policies and procedures, and may be modified or discontinued without advance notice. We will try to inform you of any changes as they occur.

Third, violation of any of the procedures, practices, any policies described here may be grounds for disciplinary action up to and including termination. The disciplinary procedures and other termination procedures described in this Handbook are not all-inclusive and management reserves the right to dismiss employees for any legitimate business reason.

Finally, some of the subjects described here are covered in detail in separate benefit plan documents and other company policy documents. You should refer to these documents for specific information, since this Handbook only briefly summarizes those benefits. Please note that the terms of the written insurance policies or pension plan documents are controlling.

As an employee of WPG, you should familiarize yourself with the information in this Handbook. If you have any questions or concerning eligibility for a particular benefit, or the applicability of a policy or practice to you, you should address your specific questions to your supervisor or Human Resources department.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 6 of 103

1.3 EMPLOYEE CLASSIFICATIONS

It is the intent of Wood's Powr-Grip to clarify the definitions of employment classifications so that employees understand their employment status and benefits eligibility.

Fair Labor Standards Act (FLSA) Job Classifications

All employees are designated as either nonexempt or exempt under state and federal wage and hour laws:

- **Nonexempt employees** are entitled to overtime pay for hours worked over 40 hours in a workweek, under the FLSA and applicable state laws. These employees are typically paid on an hourly basis.
- **Exempt employees** are employees who are exempt from the overtime provisions of the FLSA and applicable state laws. Exempt employees hold jobs that meet the standards and criteria established under the FLSA by the U.S. Department of Labor. These employees are typically paid on a salaried basis.


Company Job Classifications

Wood's Powr-Grip has established the following categories for both nonexempt and exempt employees:

- **Regular full-time employees** are not in a temporary status and are regularly scheduled to work at least 30 hours per week. Generally, they are eligible for the full benefits package, subject to the terms, conditions and limitations of each benefit program.
- **Regular part-time employees** are not in a temporary status and are regularly scheduled to work less than 30 hours per week but at least 5 (five) hours per week. Regular part-time employees are eligible for some of the benefits offered by the company, subject to the terms, conditions, and limitations of each benefit program.
- **Temporary/Seasonal employees** are hired to temporarily supplement the workforce or to assist in the completion of a specific project and are temporarily scheduled to work at the company for a limited duration, generally not exceeding six consecutive months. Temporary/Seasonal employees are generally not eligible for any benefits offered by the company. Temporary/Seasonal employees should consult each benefit's Summary Plan Description, or policy for information regarding the classification of employees eligible under the specific benefit program.


Reclassification

Employee classifications are subject to changed based on changes in employment status, job duties or work hours. Any reclassification will be communicated to the employee in writing and

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 7 of 103

adjustments to benefits and other employment terms will be made in accordance with the new classification.

Employees with any questions about their employment classification, benefits eligibility, or exemption status should contact Human Resources.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 8 of 103

SECTION 2: EMPLOYMENT POLICIES

2.1 NONDISCRIMINATION/ANTI-HARASSMENT POLICY AND COMPLAINT PROCEDURE


We expect employees to develop and maintain business-like relationships free of bias, prejudice, and harassment. In keeping with this commitment, we will not tolerate unlawful harassment or discrimination of employees by anyone, including any supervisor, manager, co-worker, vendor, client, contractor, customer or other regular WPG visitor. Employees have a responsibility to treat others with dignity and respect. Any employee found to have willfully exhibited inappropriate conduct or behavior against others may be subject to disciplinary action up to and including termination.

Equal Employment Opportunity is a fundamental principle at WPG where employment is based upon personal capabilities without discrimination on the basis of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability when the reasonable demands of the position do not require an age, physical or mental disability, marital status, genetic information, or sex distinction or any other protected characteristic as established by federal, state, and local laws.

This policy applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, layoff, discharge, training, and all other terms, conditions, and privileges of employment. Your questions or concerns should be referred to the Human Resources Department who have overall responsibility for this policy and maintain reporting and monitoring procedures.

Accommodation

If you require specialized accommodations for a mental or physical disability or religious belief/practice, etc., either for your current job or for jobs for which you wish to apply, contact your supervisor or the Human Resources Department. It is important that you notify us of your need for an accommodation as soon as possible. Once that is done, we will work with you through an interactive process to evaluate and, if possible, arrange for a reasonable accommodation. Generally, a reasonable accommodation will be attempted unless it creates an undue hardship for the company. A reasonable accommodation does not mean the elimination of an essential function of the job.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 9 of 103

Harassment/Nondiscrimination

Harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status or any other characteristic protected by law. WPG will not tolerate harassing conduct that affects tangible job benefits, that interferes unreasonably with an individual's work performance, or that creates an intimidating, hostile, or offensive working environment. Such harassment may include, for example, jokes about another person's protected status, kidding, teasing, or practical jokes directed at a person based on his or her protected status.

This policy applies to conduct occurring in the workplace and/or in other settings where WPG employees may be in connection with their work, such as business trips and business-related social events. Further these prohibitions apply not only to the spoken or written word but also to e-mail, text messages and social media posts.

The prohibited conduct also includes, but is not limited to:

(a) epithets, slurs, negative stereotyping, threatening, use of hate words (such as the n-word), hostile, offensive, or intimidating acts that are based on a person's protected status;

(b) epithets, slurs, rude or offensive comments not based on a protected status but intended to belittle, intimidate, humiliate, or embarrass another;


(c) written or graphic material circulated within or posted within the workplace, on company time or using company equipment by email, phone (including voice messages), text messages, social networking sites, etc. that shows hostility toward a person or group because of their protected status.

Yes, the harassment policy applies to social media posts, tweets, etc., that are about or may be seen by other employees, customers, clients, competitors, etc.

Yes, an employee's Facebook account may be configured as private. But if co-workers are connected and see the posts, the posts are fair and eligible for corrective action if they cross these types of boundaries.

Sexual Harassment

Sexual harassment deserves special attention. Sexual harassment may include subtle and not so subtle behaviors, may be directed towards individuals of the same or different gender, and may include explicit sexual propositions, sexual innuendo, commentary about an individual's body, sexual prowess or sexual deficiencies, sexually oriented "kidding" or "teasing;" "practical jokes," jokes about obscene printed or visual material; staring, leering or whistling; insulting or obscene comments or gestures and physical contact such as patting, pinching or brushing against another person's body. Sexual harassment includes unwelcome verbal or physical conduct of a sexual nature when:

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 10 of 103

- Submission to the conduct is implicitly or explicitly made a term or condition of employment;
- Submission to or rejection of the conduct is used as the basis for an employment decision affecting the individual; or
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Prohibited Sexual harassment also includes:

- Harassment directed toward a person because of gender
- Propositions or pressure to engage in sexual activity
- Sexual assault
- Display of magazines, books, or pictures with a sexual connotation
- Any harassing behavior, whether or not sexual in nature, directed toward a person because of the person's gender, including, but not limited to, hazing employees working in nontraditional work environments.

Retaliation


Neither WPG nor any of its employees, will retaliate against any applicant, employee, or past employee for opposing unlawful discriminatory practices, reporting, or assisting in making a harassment or discrimination complaint or cooperating in a harassment or discrimination investigation. Retaliation in any form is grounds for disciplinary action up to and including discharge.

Complaint Procedure

All employees are responsible to help ensure that WPG avoids all forms of harassment, discrimination, or retaliation in the workplace. Whenever possible, any person who is experiencing unwelcome conduct, of the type generally described above, should inform the person engaging in the conduct that it is unwelcome and request that it stop. Employees who believe they have been subjected to discrimination or harassment or have witnessed such behavior should immediately report this information to your supervisor or the Human Resources Department.

Corrective Action

WPG will attempt to investigate all complaints of harassment, discrimination, and retaliation thoroughly, to the fullest extent practicable. WPG will keep complaints and the terms of their resolution confidential; however, it cannot guarantee complete confidentiality to complete a thorough investigation. If an investigation confirms that a violation of this policy has occurred, WPG will take appropriate, corrective action including discipline up to and including termination from employment.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 11 of 103

2.2 NONDISCLOSURE / CONFIDENTIALITY

All WPG records and information relating to WPG or its customers are confidential, and employees must, therefore, treat all matters accordingly. No company information, including without limitation, documents, notes, files, records, personal information including credit card information, oral information, computer files or similar materials, except in the ordinary course of performing duties on behalf of the company, may be removed from WPG's premises without permission from WPG.


Additionally, the contents of WPG's records or information otherwise obtained regarding business may not be disclosed to anyone, except where required for a business purpose. Employees must not disclose any confidential information, purposefully or inadvertently through casual conversation, to any unauthorized person inside or outside WPG. Employees who are unsure about the confidential nature of specific information must ask their supervisor for clarification. Employees will be subject to appropriate disciplinary action, up to and including termination, for revealing information of a confidential nature.

All employees must be aware that WPG retains legal ownership of the product of their work. No work product created while employed by WPG can be claimed, construed, or presented as property of the individual, even after employment by WPG has been terminated or the relevant project completed. This includes written and electronic documents, audio and video recordings, system code, and also any concepts, ideas, or other intellectual property developed for WPG, regardless of whether the intellectual property is actually used by WPG.

Although it is acceptable for an employee to display and/or discuss a portion or the whole of certain work product as an example in certain situations (e.g., on a resume, in a freelancer's meeting with a prospective client), one must bear in mind that information classified as confidential must remain so even after the end of employment, and that supplying certain other entities with certain types of information may constitute a conflict of interest and/or a breach of confidentiality. In any event, it must always be made clear that work product is the sole and exclusive property of WPG. Freelancers and temporary employees must be particularly careful in the course of any work they discuss doing, or actually do, for a competitor of WPG.

2.3 TRADE SECRETS

Like most manufacturing firms, WPG has developed special ways of designing, making and selling its products. Because such special techniques make WPG products more attractive and valuable to customers, they help to maintain and protect existing jobs and create new jobs.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 12 of 103

Whatever WPG employees do in connection with designing, making and selling our products that our competitors do not or cannot do is called "proprietary information." If such information should become public knowledge or be disclosed to even one competitor, it would damage our business and, inevitably, threaten the jobs the company provides to all employees. Therefore, the company must have a firm policy to protect such information and guard against disclosure.

Employees should never discuss with non-company people any engineering, manufacturing, sales or financial aspects of our business. Also, employees must use reasonable care in talking about company business with fellow employees in any public place. Proprietary information can be unintentionally "leaked" in such situations.


Should you leave the company for any reason, the obligation not to disclose proprietary information, continues. This is a legal obligation that the company views seriously, since the confidentiality of what we know about making our products is one of our most valuable assets.

2.4 RESIGNATION

WPG requests that employees give two weeks written notice of intention to leave their job. WPG reserves the right to provide an employee with two weeks' pay in lieu of notice in situations where job or business needs warrant such action. Such a decision should not be perceived as reflecting negatively on the employee since it may be due to a variety of reasons not known to the individual or other employees. If an employee provides more notice than requested, WPG will evaluate whether the additional notice is necessary for effective business operations and will notify the employee of the final date of employment based on those needs. Employees will not be allowed to rescind a resignation, whether given orally or in writing, once the resignation has been confirmed by WPG, unless approved by Executive Management.

When an employee voluntarily resigns his or her position with the company, the employee's supervisor or Human Resources may schedule an exit interview on or close to the employee's final day of employment to discuss the reasons for leaving and general resignation procedures. At or before the exit interview, the employee must return all company property in his or her possession, including but limited to: Company time/ID card; door fob; keys; combination lock; LO/TO lock; tools; shop coat; manuals; Employee Handbook; computer or office equipment and credit cards. At the exit interview, the employee should provide an address for sending future benefit and tax information.

2.5 PROBATIONARY EMPLOYMENT PERIOD

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 13 of 103

The probationary period is intended to give new and rehired employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets both the employee's and the employer's expectations. WPG uses this period to evaluate your capabilities, work habits, and overall performance. During a probationary period of employment either you or the Company may end the employment relationship at will at any time with or without cause or advanced notice. Probationary employees do not have access to the Complaint Resolution/Grievance Procedure to appeal disciplinary action or discharge.

All new and rehired employees work on a probationary basis during the first twelve months of employment, unless a longer probationary period is deemed appropriate because of the position for which the employee is being hired. Because of your performance, your particular position or because you have been away from work for a period of time during this first twelve months of employment, if the Company does not feel it has had an adequate opportunity to review your performance, the company may extend a probationary period. If WPG determines that an extension of the probationary period is necessary, the probationary period may be extended for a specified period, not to exceed eighteen months. This allows for full evaluation of performance required for your individual circumstances.


In most cases, job skills are acquired, rather than brought with the worker. If employees maintain a **POSITIVE ATTITUDE** toward the company and their jobs, acquisition of **SUITABLE JOB SKILLS** should follow naturally.

In a manufacturing operation, **EMPLOYEE RELIABILITY** is also of primary importance. Employee reliability refers to an employee being present and on time for all scheduled shifts. Lost work time, in any form, is costly for the company.

Among many other factors, maintaining a positive attitude, acquisition of such suitable job skills and employee reliability will be part of the criteria upon which a new employee's performance is evaluated.

Supervisors may schedule one or more evaluation conferences with new employees during their probationary period. During such evaluations, new employees will be advised as to how well they are performing their jobs, and may be given suggestions on ways to improve work performance.

During the probationary period, new and rehired employees are eligible for the benefits required by law, such as worker's compensation insurance and Social Security. Employees may be eligible for other company provided benefits, subject to the terms and conditions of each benefit program. Employees shall be informed of the details of specific benefits programs as the employees become eligible.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 14 of 103

2.6 BASIC SAFETY EQUIPMENT

SAFETY GLASSES

Safety glasses, with side shields, which are in conformance with American National Standard Z87.1 and are approved by Management, are required in all Production areas. "Production areas" are defined as the areas of the building beyond the downstairs breakroom- including: Handcup Assembly, Central Store, Shipping, and all remaining production areas. Safety glasses are not required to be worn in office areas: central administration, all upstairs offices, the break room, Central Store office, Shipping upstairs office, and in Production Supervisor offices, except during those occasional times when there is an activity taking place in a non-production or office area that requires the wearing of safety glasses (e.g. when working with power tools or compressed air).


Safety glasses are to be worn by all employees and visitors in the designated areas. Safety glasses are also to be worn while moving to and from break areas. Only slightly tinted glasses may be worn if provided by the company. Darker tinted glasses may be worn if prescribed by a medical professional for medical reasons. The Safety department must be notified if that is the case.

Each employee will be issued a pair of non-prescription safety glasses during employee orientation. In non-prescription safety glasses are damaged or completely worn out, they will be replaced at the employer's expense. Employees are NOT permitted to take company-provided glasses off the premises.

WPG will assist those employees who require optical correction with the purchase of prescription safety glasses. WPG will pay a base amount which provides a basic pair of glasses consisting of polycarbonate lenses, standard frames and permanent side shields. Employees must provide their own prescription. Employees opting for optional lenses, upgraded frames, or any other additional cost items will be required to pay for the extras. If these glasses are lost or damaged due to negligence by the employee, the employee will be responsible for the entire cost of purchasing new ones. If the damage to the glasses is work-related or if the employee's vision changes so that a new prescription is needed, as determined by an optometrist, WPG will again make the standard contributions as defined in the Prescription Safety Glasses program, up to once per each 12 month period. If glasses are damaged at work, the employee must notify his/her supervisor immediately, and must not wait until the following day. Prior to receiving company-provided prescription safety glasses, employees will be required to wear safety glasses that can be worn over existing corrective eyewear until their new glasses arrive. See the Safety department for procedures in obtaining prescription safety glasses.

HEARING PROTECTION

Designated tasks in the production area will have proper hearing protection recommended. Employees are encouraged to wear proper hearing protection in those areas where loud operations

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 15 of 103

are taking place. The Safety Department will ensure that the Hearing Protection Program is current and that all requirements are enforced. See Section 2.10 regarding approved hearing protection for use with listening devices.

SHOP COATS

A shop coat will be issued on request. If a shop coat is worn out, it will be replaced at the company's expense. Worn out shop coats must be brought in for replacement. Employees will be responsible for replacing their shop coats if they are lost or stolen. Shop coats are to be returned to the company when the employee leaves employment.

ADDITIONAL SAFETY EQUIPMENT

Additional safety equipment such as safety harnesses, gloves, goggles, face shields, rubber aprons, hoods, boots and respirators, etc. may also be required, depending on the individual operation. Any employee engaged in such an operation must wear all applicable safety equipment while engaged in such operation.


2.7 DRIVING RULES ON COMPANY TIME

Anyone driving company vehicles must furnish certain information for the company's insurance carrier. This information consists of full name, date of birth and a Montana driver's license number. Also, anyone who is on the approved list of company vehicle drivers, as maintained by the HR department, will be required to complete annual safe driver training.

The company's insurance carrier will check driving records and will dictate who may be allowed to drive company vehicles.

The safety of employees, while operating or riding in company vehicles at any time or other vehicles while on company business, is of primary importance. For this reason, certain guidelines are offered in connection with the use of any vehicle for company business. Whenever using a company vehicle at any time or other vehicle for business purposes, arriving safely must always be given higher priority than arriving early. In line with this philosophy, the general policy of WPG's is that settlement of traffic citations will be the responsibility of the employee who is driving.

WPG may, depending upon circumstances, consider in-company discipline when an employee receives a citation while driving a company or other vehicle while on company business. Of particular concern would be citations for reckless driving, careless driving, excessive daytime speeding, excessive night speeding, and driving under the influence. An employee convicted of

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 16 of 103

charges of DUI while driving a company or other vehicle while on company business will be subject to immediate disciplinary action up to and including termination.

When driving company vehicles, or when driving other vehicles on company business, employees will be expected to observe all traffic regulations, including all applicable seat belt and cell phone laws.

2.8 DRESS CODE AND PERSONAL HYGIENE


Employees are expected to dress in a manner appropriate to their position. Those employees operating machinery must dress in clothing that will not interfere with the machinery or present a safety hazard. Some minimum dress standards include the following: shorts are not to be worn at work at any time; long pants are to be worn in the shop/production area; clothing should be in clean and in good repair; shoes worn in the shop/production area must have closed toes and closed heels – the entire shoe must be closed so that no part of the foot is exposed. All employees are expected to be dressed and groomed in a manner that is not offensive to those around them (i.e.: offensive body odor; clothing that is offensive, etc.) If an employee is dressed inappropriately, that employee will be sent home to change into appropriate attire. Non-exempt employees will not be compensated for this time away from work. Repeated violations of the dress code policy can result in disciplinary action, up to and including termination.

If employees require reasonable accommodation regarding dress for bona fide health and/or religious reasons, they should contact their supervisor or Human Resources to discuss an exception to these dress code guidelines. Unless it could constitute an undue hardship or safety hazard, WPG will accommodate such reasonable requests.

Supervisors and managers can specify additional or alternative dress and grooming requirements based upon the business and safety needs of their departments.

The emergence of new and more dangerous bacteria, viruses, flu strains, and other diseases, which are increasingly resistant to conventional medical treatment make it ever more important that all employees observe basic steps regarding personal hygiene. With that in mind, all employees are expected to thoroughly wash their hands after using the bathroom and before handling any things which others commonly come in contact with. Repeated violations of this policy can result in disciplinary action, up to and including termination.

2.9 LOCKERS

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 17 of 103

The company provides lockers for employees in production-based positions. An employee's supervisor will assign a locker. Employees should put a sticker with their name on it on the locker. For those who desire one, the HR Department will issue a lock. The company reserves the right to search a locker or lockers if required in connection with law enforcement activities, or in any situation which may affect the health, safety, or wellbeing of employees or the company.

2.10 USE OF PERSONAL MUSIC DEVICES

As a safety precaution, employees will not be allowed to listen to radios or any other personal music players, with or without the use of earbuds, unless approved by the department supervisor or manager AND the Safety department. Management may control the volume of speaker-type devices if the volume of such devices may cause an employee to be distracted or if the volume is above a noise level which may be distracting to others around them. At no time may an employee listen to any music, talk radio, audiobook, etc. over a speaker that is offensive or contains language or content that may be viewed as offensive, or that may cause the employee or others around them to lose focus on their work-related tasks.


Employees may wear pre-approved earbuds when doing stationary work pursuant to WPG's Hearing Conservation Policy. The Safety department will maintain a list of currently approved earbuds that employees may use. Employees may not use any earbud that is not listed as pre-approved by the Safety Specialist. The company will not provide these earbuds, however the Safety department may, at times, stock some versions of the approved earbuds. It is at the discretion of the Safety department which versions will be kept in stock, and it is subject to change at any time without advance notice.

Earbuds purchased from the company or using funds from the WPG Apparel Program are to remain on the premises. If these earbuds are lost or damaged due to negligence by the employee, he or she will be responsible for purchasing new ones at full price. If the damage to these earbuds is work related WPG will again provide a set of earphones at the reduced cost, up to once a year.

Use of earbuds if it is a distraction or while performing a safety sensitive function, such as operating a forklift, is strictly prohibited. Violation of this policy is subject to personal music device privileges being revoked either personally or department or company-wide, and discipline, up to and including termination.

2.11 FIREARMS AND OTHER WEAPONS

No LOADED firearm will be allowed inside the building or on company property at any time. No concealed firearms or other weapons will be allowed inside the building. Unloaded firearms may

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 18 of 103

be allowed inside the building with prior authorization from management, and only under very limited and controlled circumstances. Any employee in violation of this policy will be subject to prompt disciplinary action up to and including termination.

2.12 PERSONNEL INFORMATION AND PRIVACY

Personnel files are maintained for each employee. Personnel files are the property of WPG and may not leave the company premises. An appointment must be made with your supervisor, in advance and within reason, if you wish to view your personnel file. Personnel files are to be reviewed in Human Resources. Personnel files may not be taken outside of the department. Management reserves the right to deny access to company employee files.

Personnel files are maintained by the Human Resources Department and are considered confidential. Managers and supervisors other than the Human Resources Department may only have access to personnel file information on a need-to-know basis. A manager or supervisor considering the hire of a former employee or transfer of a current employee may be granted access to the file.


For accurate administration of your wages and benefits, and for compliance with federal and state regulations, it is necessary that current and accurate personnel records be maintained for each employee. This information is also necessary in the event you must be reached in an emergency or for available work. If there are changes, or if you observe or are aware of any errors in your personnel records, please notify your supervisor immediately. Falsification of any personal information is cause for disciplinary action, up to and including termination.

WPG treats personal information about employees as confidential and respects the need for protecting each employee's privacy by enforcing secure information handling procedures on the part of all personnel whose job duties involve gathering, retaining, using, or releasing personal information about the company's employees.

2.13 PERSONNEL DATA CHANGES

It is the responsibility of each employee to promptly notify their supervisor or the Human Resources Department of any changes in personnel data such as:

- Mailing address,
- Telephone numbers,
- Individual(s) to be contacted in the event of an emergency

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 19 of 103

- Name and number of dependents resulting in changes to benefit eligibility or tax withholding
- Marital Status resulting in changes to benefit eligibility or tax withholding

An employee's personnel data should be accurate and current at all times.

2.14 EMPLOYER INFORMATION AND PROPERTY

The protection of WPG's business information, property and all other Company assets are vital to the interests and success of WPG. No WPG information or property, including without limitation, documents, files records, computer files, equipment, office supplies or similar material (except in the ordinary course of performing duties on behalf of WPG) may, therefore, be removed from the WPG's premises. Violation of this policy is a serious offense and will result in appropriate disciplinary action, up to and including termination.

Meetings held on WPG premises must be for the purpose of conducting WPG business. Youth and/or charity organizations may occasionally use the premises upon approval of management.

In addition, when an employee leaves the employment of WPG, the employee must return to the Company all WPG related information and property that the employee has in his or her possession, including but not limited to documents, files, records, manuals, information stored on a personal computer or on a computer disc, supplies, equipment, office supplies, shop coats, keys, door key fob, time clock card and Employee Handbook.

2.15 BUILDING ACCESS POLICY


1. Employee Access

Door-entry keys are issued to most employees upon employment. Anyone issued such a key is responsible for the actions of anyone who uses that key to gain entrance to the building. These keys remain the property of WPG and can be recalled at any time.

Anyone entering the building at any time other than normal working hours must have advance approval. Non-employees are not allowed in the building after normal business hours without advance permission from management.

2. Company Visitors to WPG

"Company Visitors" are expected to do the following:

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 20 of 103

- [1] Enter through the front reception area;
- [2] Sign in on the Visitor Log at the front reception area when they arrive in order to account for the visitor's presence on company property, especially during an emergency;
- [3] Remain in the reception area until accompanied elsewhere by an employee;
- [4] Follow Wood's Powr-Grip's safety requirements, including but not limited to the requirements on the production floor to wearing safety glasses at all times, wear closed toe/closed heel shoes, wear long pants, and wear hearing protection when appropriate; and,
- [5] Sign out on the Visitors Log front reception area when leaving so that the company knows the visitor is no longer on the premises.

The employee who has a visitor will be called or paged to the reception area to accompany and assist the visitor. The employee receiving the visitor is responsible for the whereabouts, safety and conduct of the visitor while on company property.


Visits with personal visitors (family, friends, non-work related) are generally discouraged unless they take place during designated break times or at lunch. Personal visits will take place in a designated visiting area. Designated visiting areas are the employee break room, the reception area or the individual office of the person receiving the visitor. Unless the personal visit is confined to a designated break time or lunch time, personal visits of more than 5 minutes will need to be put on available leave time and such interruptions by personal visitors, if excessive, will be grounds for disciplinary action.

Visitors for work-related purposes shall be accompanied and assisted by the employee who the visitor is here to see, or if that employee is for some reason unavailable, another employee shall be assigned to accompany and assist the visitor. In those instances where the visitor is here for a work-related purpose of an extended duration, like making repairs or installing equipment, the visitor need not be constantly accompanied by an employee. However, such a visitor should be checked on frequently to ensure the safety of the visitor and the safety and security of the company's employees and property.

3. Unauthorized Entry

Unauthorized entry into or disturbing of private offices, lockers, desks, computers and filing areas belonging to or operated by other employees is not allowed. Any such unauthorized entry or tampering will be considered a serious offense and will result in disciplinary action, up to and including termination. The company reserves the right to search a locker or lockers if required in connection with law enforcement activities, or in any situation which may affect the health, safety, or wellbeing of employees or the company.

4. Keys

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 21 of 103

In addition to the door-entry key, there are several other keys used for a variety of purposes throughout the building and on company property. Keys are issued only to an employee when management determines that it is in the best interest of the company for that employee to have a key. Copying a key without prior authorization is grounds for termination.

If any employee who has the responsibility to unlock specific areas during the workday is absent, that employee must notify their supervisor of the absence so the responsibility can be re-assigned.

All keys are to be returned to the company upon leaving the employment of WPG.

2.16 CANDLES


Because of the obvious fire danger associated with burning candles, and the past observation of candles frequently left unattended while burning, burning candles are not allowed in any area of the building.

2.17 HIRING STUDENTS UNDER 18 YEARS OLD AND RELATIVES OF EMPLOYEES

Wood's Powr-Grip Co. Inc. (WPG) is committed to full compliance with all laws relating to the employment of minors. Toward that end, in order to comply with all Federal and Montana State child labor laws, and in order to avoid misunderstanding regarding hiring and employment of students, WPG employee relatives, and all people under the age of 18, WPG has set forth the following policy:

1. WPG has put the following hiring parameters in place:

- Subject to an exception by decision of Executive Management, an applicant must be at least 16 years old to be considered for employment.
- An applicant must be qualified for the open position(s)
- The company will consider employment applications from relatives of employees. However, being a relative of any current WPG employee DOES NOT guarantee employment. While being a relative of a current employee will be taken into consideration, an applicant must meet the first two parameters to even be considered.
- In most instances, employees will not be employed in the same department with anyone to whom they are related or be supervised by anyone to whom they are related.
- Recognizing that in some limited instances strict adherence to the requirements of this paragraph may not be possible or may not be in the best interests of the company, the requirements of this paragraph are subject to exceptions by decision of Executive Management.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 22 of 103

2. Any person over the age of 18 years' old who meets the requirements above may work whatever hours that they are available to work, that meet the needs of the company, and that are specified as that person's work schedule.

3. Any person under the age of 18 years old, can work in any areas consistent with restrictions of existing law or which fall within the exceptions set forth in in Section 41-2-110, M.C.A. and that meet the needs of the company.

4. Any person who is 18 years of age or older may work in any area of production for which they are qualified and that meet the needs of the company.

5. WPG, as long as it does not disrupt the needs of the company, is willing to consider some schedule flexibility for students related to the following:

- Schools' holiday/vacation schedules
- Schools' activity/event schedules
- Clubs, Activities, Sports, and Events the student is involved in - as long as they are made known to the company at the time of hire, or within a reasonable time thereafter.

6. WPG holds the same expectations for student workers in regards to being present, on-time and adhering to all company policies and procedures.


2.18 PERSONAL PACKAGES

UPS, the U.S. Postal Service, and other delivery companies have from time to time delivered personal packages to employees here at WPG. In such cases, shipping will call the employee to the shipping department or will deliver the package if time allows. Shipping will accept packages for an employee who is absent or is working a different shift and will hold the package until the employee can pick it up. Employees who will be gone for an extended period of time, such as a vacation, and are expecting a package, are responsible for notifying the appropriate delivery organization or company and make proper arrangements.

If an employee has packages sent to the WPG address, under no circumstances should the name "Wood's Powr-Grip" be used in the address or the billing.

2.19 CONFLICT OF INTEREST AND OUTSIDE EMPLOYMENT STATEMENT

Acceptance of Entertainment, Gifts, Favors, and Gratuities

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 23 of 103

No employee shall solicit or accept any gift, gratuity, favor, entertainment, reward, or any other item of monetary value that might influence or appear to influence the judgment or conduct of the employee in the performance of his/her job. Employees can accept gifts or entertainment only in cases where the gifts or entertainment are of nominal value, are customary in the industry, will not violate any laws, and will not influence or appear to influence the employee's judgment or conduct at his/her employer's business.

Conflict of Interest

WPG expects its employees to conduct business according to the highest ethical standards of conduct and devote your best efforts to the interests of the Company. Employees may not use their position with the company to obtain favors and or benefits for themselves or others. Business dealings that appear to create a conflict between the interests of WPG and an employee are unacceptable.

WPG recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that WPG may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever an employee can influence a decision that may result in a personal gain for the employee or an immediate family member (i.e., spouse or significant other, children, parents, siblings) as a result of WPG's business dealings.


Although it is not possible to specify every action that might create a conflict of interest, this policy addresses actions that frequently present problems. If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he/she should immediately contact the Human Resources Department to obtain advice on the issue. The purpose of this policy is to protect employees from any conflict of interest that might arise.

A violation of this policy will result in immediate and appropriate discipline, up to and including termination.

Giving Entertainment, Gifts, Favors, and Gratuities

No employee shall give any gift, gratuity, favor, entertainment, reward, or any other item of monetary value that might influence or appear to influence the judgment or conduct of the recipient in the performance of his/her job. Employees can give gifts or entertainment only in cases where the gifts or entertainment are of nominal value, are customary in the industry, will not violate any laws, and will not influence or appear to influence the recipient's judgment or conduct at his/her employer's business.

Outside Employment

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 24 of 103

Outside employment that constitutes a conflict of interest is prohibited. Employees of WPG cannot simultaneously work for a competitor nor can an employee on his or her own time, operate a business or perform work of a competing nature.

All employees holding outside employment must inform their supervisor of the nature of the work and the hours when they work. If an employee's supervisor determines that the outside employment interferes with the employee's performance or creates an actual or apparent conflict of interest, the employee may be asked to terminate the outside employment.

If WPG determines that an employee's outside work interferes with performance or the ability to meet the requirements of WPG as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with WPG.

WPG does not consider outside employment to be an excuse for poor job performance, tardiness, absenteeism, or refusal to work overtime. If outside employment leads to these problems, WPG will discipline the employee, up to and including termination.

Reporting Potential Conflicts


An employee must promptly disclose actual or potential conflicts of interest, in writing, to his/her supervisor. Approval will not be given unless the relationship will not interfere with the employee's duties or will not damage the Company's relationship.

2.20 ATTENDANCE POLICY

Employee reliability, regardless of position, is of primary importance. Employee reliability refers to an employee being present and on time for all scheduled shifts. Lost work time, in any form, is not only costly for the company but also has a negative impact on the morale of other employees. Each employee is therefore expected to report to work on time at the beginning of their shift, report to work on time from lunch, return to work on time from break, stay at workstations between breaks unless job functions require otherwise, and abide by the organization's policies regarding attendance.

1. Work Hours

There are several standard shifts for hourly-wage employees which occur during the period of Mondays through Fridays. Each non-exempt employee will be assigned a "regular shift" by the supervisor of the employee's department. Each non-exempt employee will be expected to strictly adhere to the particular hours of that assigned "regular shift." Any variations from "regular-shift"

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 25 of 103

hours must be initiated by the employee's supervisor on a "Change in Work Hours," a "Request for Shift Change" or a Schedule Deviation form.

Exempt employees may be assigned particular hours they are expected to be present in the building because of the necessities of their particular position. However, as exempt employees, they are accorded some flexibility in determining when work is done, keeping in mind that they are expected to put in the necessary amount of time in order to complete the tasks assigned to them.

During all shifts, each employee is expected to be at their workstation or designated area of work when the starting buzzer sounds, or at the designated time, and remain there during designated work hours unless their particular job duties require otherwise.

2. Time Clock


All hours actually worked are recorded electronically and maintained in the Company's time-keeping computer database.

In order to accurately record work time, each employee, regardless of pay status, is required to clock in at the beginning of each shift and clock out at the end of each shift. Employees must clock out whenever they leave during scheduled working hours and clock in upon their return. To account for the time that an employee is gone, a schedule deviation form signed by the supervisor must be submitted to Payroll before the employee takes time off unless doing so beforehand is unavoidable. This includes employees leaving the premises during scheduled 20-minute break periods.

Clocking in or out for someone else is strictly prohibited. If there is an occasion when it is impossible to get to the time clock when it is time to clock in or out, employees must arrange to have a supervisor or Human Resources authorize adjustments and notify Payroll.

Clocking in and out, on time, and appropriately, is a separate and distinct job responsibility of each employee. Any employee who fails to do so correctly will be required to sign a Manual Punch Adjustment form so that Payroll can accurately track and record that employee's work time. Repeated failures to correctly clock in or out may result in disciplinary action, up to and including termination.

Our timekeeping system rounds clock-in and clock-out times to the nearest quarter hour (0-7 minutes rounds down, 8-14 minutes rounds up). Employees should clock in no more than 7 minutes before and clock out no more than 7 minutes after their scheduled times. Clocking in significantly early or late to gain additional time is prohibited and considered time theft, subject to disciplinary action, up to and including termination.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 26 of 103

3. Being Tardy is Prohibited

Being tardy is prohibited. An employee is expected to have properly clocked in and made it to his/her workstation by the time the starting buzzer sounds. In order to accomplish this, it is expected that each employee will account for such things as weather, road conditions, traffic, the time it takes to walk from the time clock to the workstation, etc., in determining what actions are necessary in order to be at work on time. Any employee who is not at his/her work station at time the shift buzzer sounds or who clocks in after the start of his/her shift is considered tardy. Excessive tardiness may result in discipline, up to and including termination.

4. Break Periods

Employees should check with their supervisor to determine the time and duration of their break periods. Employees are reminded that "break" time is not "free" time. It is paid time that belongs to the company, and employees are expected to remain on company property during breaks.

If an employee must leave during break time, the procedure would be no different than during any other time of the workday. Whenever an employee must leave work during a shift, the employee must clock out and a leave request must be submitted and approved by the supervisor PRIOR to leaving.

2.21 AUTHORIZED ABSENCES


1. Authorization Required

Because of the nature of the manufacturing business, employee reliability is an important factor with respect to scheduling, production and morale. Unauthorized absence is strictly prohibited. Each employee is responsible for assuring that leave is authorized for each absence. The determination as to whether an absence is authorized is to be made by a supervisor or other management, depending on the circumstances.

2. Anticipated Absences – Advance Notice

Authorized leave requests are an essential part of the company's record-keeping and scheduling process (particularly with regard to payroll). When an employee knows in advance that he/she will be absent for a scheduled shift, a leave request should be submitted by the employee to his/her supervisor before the leave is taken and as soon as the employee is aware of the need or desire to take such leave.

3. Leave Taken During a Work Shift

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 27 of 103

When employees request leave during a work shift, they must receive approval from their supervisor, or the next higher authority, prior to leaving the workplace. A leave slip must be completed and signed by the employee's supervisor, or in the supervisor's absence by the next higher authority, prior to leaving the workplace.

4. Unanticipated Absences – Notice Requirements


For an unanticipated absence, it is the responsibility of the employee to notify the company prior to the start of the employees scheduled shift. Except in unusual circumstances, the employee is expected to call-in as soon as the employee knows they will be absent. Employees are to first, call their supervisor/assistant supervisor regarding their absence before the start of their shift. If they are unable to speak personally with their supervisor/assistant supervisor, they are to leave a voice-message with return call information. Employee should ALSO call the reception desk and leave a message before the start of their shift if unable to speak with the supervisor, even if able to leave a voice-message. Whenever possible, the employee should try to provide an estimated time/date for their return to work. An employee must call in before the start of their shift in order to be approved to use paid Personal Leave or approved absent without pay for their absence. Except in very unusual circumstances, if the employee has not contacted the company within 30 minutes after the shift begins, his/her absence will be considered unauthorized and may be subject to further discipline.

If the absence exceeds one day, the employee is expected to contact his/her supervisor on each day of absence (following the call in procedures stated above) and provide an update of that employee's status. If the employee fails to call in as required above, the absence may be considered unauthorized and the employee may be subject to further disciplinary action. Immediately upon return to work, the employee must submit a leave slip to his/her supervisor. If the supervisor has not already done so, at that time, the supervisor will determine if the absence will be considered an authorized absence.

Just calling in as required for an unanticipated absence, does not necessarily make missing work an "approved" leave. Unanticipated absences are intended for situations where an employee is physically unable to come to work due to unexpected circumstances beyond the employee's control. Examples of such circumstances include, but are not limited to personal illness, family member illness, or other situations of an unexpected nature. "Unexpected circumstances beyond an employee's control" do not include such things as the sudden desire simply to not come to work. Excessive or frequent unanticipated absences may be cause for disciplinary action, up to and including termination.

5. Three Consecutive Days of Unauthorized Absence

If an employee is absent without authorization for three (3) consecutive scheduled workdays, the

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 28 of 103

company will presume that the employee has voluntarily resigned, and employment at WPG will end on that basis.

6. Leave Without Pay & Absent Without Pay

Leave Without Pay refers to those situations where the employee had assigned paid leave benefits but has used all of those benefits in such a way as to indicate poor planning or other abuse of the paid leave benefits programs, and the missed time does not qualify as Absence Without Pay. Leave Without Pay is not considered to be a good work practice. Therefore, the accumulation of LWOP will be closely monitored and disciplinary action may be initiated, up to and including termination, depending on the circumstances of the particular employee and the reasons for the leave.

LWOP is the standard category to be used when an employee misses scheduled work time. However, since LWOP is considered to be negative, AWOP is available.


Absence Without Pay (AWOP) is applicable in four situations:

1. An employee has completed all available work for that day or for some other reason determined by a decision of a Department Manager/Supervisor to be related to the best interests of the company's business, therefore has been directed/allowed to leave work or not report to work. In such instances, if the employee has applicable leave time benefits available, the employee may choose to use some of the appropriate leave time benefits or go without pay for that time missed.
2. The employee has available leave time, but requests in a timely manner deemed appropriate by their Department Manager/Supervisor to be absent from work without pay.
3. The employee has no available paid leave time, either because the employee is probationary or part-time, OR the employee has used all paid leave benefits in such a way as to indicate good planning and/or no abuse of paid leave benefits programs **and** requests AWOP in a timely manner deemed appropriate by their Department Manager/Supervisor to be absent from work without pay.
4. Other individual situations of which require approval by Executive Management. When applicable the employee gives notices as much as possible of the need to be absent for reasons beyond the employee's control.

For all four of these situations, these conditions must be met:

1. The employee must be in good standing
2. The absence must not be being used in an way that is indicative of leave time abuse
3. The absence will not have a significant adverse impact on the needs of the company

Please note that AWOP will be granted on a very limited basis and is intended as the exception, not the rule.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 29 of 103

7. No Simultaneous Use of Multiple Paid Leaves

Employees will not be allowed to use any paid company leave simultaneously with any other paid company leave, nor can employees use paid company leaves concurrently with company provided disability or workers compensation benefits.


2.22 SUBSTANCE ABUSE POLICY

The Company is committed to providing a safe and productive workplace for its employees. In keeping with this commitment, the following rules regarding alcohol and drugs of abuse have been established for all staff members, regardless of rank or position, including both regular and temporary employees. The rules apply during working hours to all employees of the Company while they are on Company premises.

- The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on Company property is prohibited.
- Being under the influence of illegal drugs, alcohol, or substances of abuse on Company property is prohibited.
- Working while under the influence of prescription drugs that impair performance is prohibited.

So that there is no question about what these rules signify, please note the following definitions:

- Company property: All Company owned or leased property and/or equipment used by employees.
- Controlled substance of abuse: Any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act, as amended and including Medical Marijuana.
- Drug: Any chemical substance that produces physical, mental, emotional, or behavioral change in the user.
- Drug paraphernalia: Equipment, a product, or material that is used or intended for use in concealing an illegal drug, or otherwise introducing into the human body an illegal drug or controlled substance.
- Illegal drug:
 - Any drug or derivative thereof whose use, possession, sale, transfer, attempted sale or transfer, manufacture, or storage is illegal or regulated under any federal, state, or local law or regulation.
 - Any drug, including – but not limited to – a prescription drug, used for any reason other than that prescribed by a physician.
 - Inhalants used illegally.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 30 of 103

- Under the influence: A state of not having the normal use of mental or physical faculties resulting from the voluntary introduction into the body of an alcoholic beverage, drug, or substance of abuse.

Consistent with the rules listed above, any of the following actions constitutes a violation of the Company's policy on drugs and may subject an employee to disciplinary action, up to and including immediate termination.


- Using, selling, purchasing, transferring, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting to or assisting another to do so, while in the course of employment.
- Working or reporting to work, conducting Company business or being on Company property while under the influence of an illegal drug or alcohol, or in an impaired condition.

If, based on ordinary observation, the company has reasonable suspicion that an employee is working under the influence of alcohol, other drugs, or inhalants, including any chemicals used within the company, he or she may be required, as a condition of continued employment, to submit to a urine and/or breathalyzer test. If the employee admits to being under the influence of any chemical, testing may not be required. If tested, the employee may be suspended, pending the results of the test. This is to remove the employee from a potentially dangerous environment as well as to allow a thorough investigation of the situation. Only authorized facilities will be used for the collection of the specimen and will follow the procedure described in 49 Code of Federal Regulations (CFR), part 40.

All employees including newly hired or rehired employees will be provided a copy of the Drug and Alcohol Testing Policy which details the procedure. An Acknowledgement of Receipt and Adherence to the Policy will be signed and kept in the employee's personnel file. Violation of the Substance Abuse Policy and/or refusal to submit to testing will be grounds for disciplinary action up to and including termination.

2.23 PRESCRIPTION MEDICATIONS

The prohibition of controlled substances also covers all legal and prescription drugs which may impair an employee's ability to perform his or her job or prescribed drugs that are not being used in the manner prescribed or by the person for which they are prescribed. Employees who know or should know the use of a legal prescription could impair their ability to perform their jobs (i.e.; adversely affect vision, judgment, alertness, or hand-eye coordination) should inform their supervisor, the Safety Director and/or Human Resources immediately. The information, which

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 31 of 103

will be kept confidential, is necessary to properly and safely assess an employee's ability to perform his or her job duties.

2.24 THE EVALUATION PROCESS

To support a safe and productive work environment, employees of this company are required to abide by certain policies, procedures, and regulations. These have been established to protect employees and the company from injury or other threats to employee wellbeing and to promote harmonious, efficient working practices.

The company's desire is to help identify problems and to improve employee performance and behavior.


With regard to matters of job performance an effort will be made to help an employee improve performance through use of the evaluation process. However, it is the employee's responsibility to make improvements in performance. The overall objectives of an employee evaluation program are to measure, maintain, and improve job performance. Performance evaluations may also be used as a tool to:

- a. Determine salary increases based on a worker's contribution to the company.
- b. Provide a framework of goals and standards from which to measure performance.
- c. To develop action and training plans to correct performance problems, and establish goals for the next time period.
- d. Identify employees who should be promoted or given greater responsibility.
- e. Act as a forum for individual career development issues.
- f. Assure a formal time and a place for all these events to occur.

Employee evaluations in most cases, but not necessarily all cases, are conducted according to the following time schedule:

- a. Evaluation after three months of employment.
- b. Evaluation after six months of employment.
- c. A random evaluation conducted at any time considered necessary by the supervisor or other management.
- d. Annual evaluation upon the employee's hire, or re-hire (the latter of the two) anniversary date.
- e. Follow-up evaluations following negative evaluations.

Negative evaluations during the probationary period may result in termination. During a probationary period of employment, the employment may be terminated at the will of either the employer or the employee on notice to the other for any reason or for no reason.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 32 of 103

In subsequent evaluations, failure to meet job performance expectations, violation of the law, violation of a specific company policy, procedure or regulation, and/or matters that involve issues of dishonesty or present a danger to persons or property could lead to the failure to receive a raise at a minimum or other disciplinary action up to and including termination.

In some cases, a negative evaluation may be written even though no written counseling reports were issued during the evaluation period. It is possible that the employee's performance showed a negative trend without any serious incidents occurring.

The company reserves the right to take whatever measures it feels are appropriate—including termination—if, in the judgment of responsible supervisors and managers, it is in the best interest of the company or in the best interests of other employees.

2.25 TELEPHONES, CELL PHONES AND OTHER DEVICES


Employees are to ask friends and family members not to contact employees at work unless it is absolutely necessary. This rule extends not just to land-line telephone calls, but to all manners of communication available today, including, but not limited to emails, cell phone calls, text messaging, , and all forms of "social media" communication.

No personal telephone calls will be taken in the office and transferred to employees, unless it is for emergency related matters. Messages may be taken and forwarded to the employee. If messages are excessive, this courtesy will be discontinued.

Employees are not to use a staff person's telephone without permission from the staff employee.

Use of personal cell phones and other such devices anywhere in the production area is strictly prohibited unless permission is first obtained from your supervisor. Such uses include, but are not limited to, phone calls, text messaging, emails, game-playing, use as a music device, engaging in social media, etc. To discourage misuse and to avoid misunderstandings, all employees are encouraged to leave their personal cell phones in their locker, in their car, or their office/work space, or in the alternative, have them completely shut off (not just on vibrate) so they are not a distraction in the production area.

Use of personal cell phones and other such devices, as well as use of company telephones for personal reasons, at times other than designated break times and lunch hours, is also strictly prohibited unless permission is first obtained from your supervisor – this prohibition extends to all employees and to the entire building, not just the production area. Permission by supervisors shall be granted only for compelling reasons such as the need to be in communication with family or healthcare providers for health reasons or other emergency situations.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 33 of 103

In addition to any individual corrective action, up to and including termination of employment, which may be imposed for violation of this provision, there could be, if there is a continuing problem with the inappropriate use of cell phones and other electronic devices, a company-wide ban could be imposed and such devices not be allowed in the building.


2.26 SMOKING

In compliance with Montana State law (M.C.A. 50-40-115), WPG is a smoke-free facility. Smoking and Vaping are strictly prohibited inside the building and out in front of the building. Smoking will be defined as the “act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette or pipe of any kind”. Vaping refers to the use of electronic nicotine delivery systems or electronic smoking devices including, but not limited to, e-cigarettes, e-pipes, e-hookahs and e-cigars. Those who choose to smoke or vape are encouraged to use the designated area constructed for that purpose on the west side of the building. All byproducts of smoking and tobacco use (i.e. cigarette butts, chewing pouches) must be properly disposed of in appropriate apparatuses and not littered in the parking lot or within the building. Violation of this policy subjects the employee to disciplinary action, up to and including termination. In addition, M.C.A. 50-40-115 provides criminal penalties for violation of the law.

2.27 EATING, DRINKING AND CHEWING

Subject to the terms of this paragraph, no eating or drinking is allowed in the production areas during work hours. For purposes of this section, any area south of the doors dividing the downstairs breakroom from the shipping area is considered a “production area”. There is an exception to these rules about eating and drinking in production areas for the following: Hand Cup Assembly supervisor office, Machining/Cut-Out supervisor office, Frame Assembly & Powder Coating/Cleaning supervisor office, Central Store supervisor office, Shipping supervisor office. This exception extends to the Incoming Inspection room but only during those times when there is no activity taking place in that room that requires the wearing of safety glasses, such as the operation of tools or equipment or the use of chemicals.

The only drinking that is allowed in any production area is the drinking of water, or an approved similar hydrating focused beverage (ex. Gatorade, etc.) in a company issued and labeled water bottle. These water bottles must be labeled properly and be always stored in designated water bottle storage areas. These water bottles can be obtained at any time through Safety department personnel.


	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 34 of 103

Eating and drinking are allowed in production areas during break periods, provided work surfaces are not used to eat from and there is no active production occurring in the area.

All food and drink containers, pop cans, uneaten food, wrappers and other garbage must be left off the production floor such as in the break room or personal locker, or properly disposed of immediately after break. Employees are required to wash hands before eating and smoking.

Chewing tobacco, gum, sunflower seeds, and hard candy are allowed if they are put into the mouth with clean hands. Sunflower seed shells must be disposed of in a proper waste container. Tobacco chewers will provide and keep clean their own receptacles and are requested to not spit in waste baskets. There will absolutely be no spitting into urinals, sinks, toilets, drinking fountains or on floors.

There is no eating or drinking of any kind in any of the restrooms anywhere in the building.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 35 of 103

SECTION 3: STANDARDS OF CONDUCT


Discipline is at the discretion of the company and shall be decided on a case-by-case basis. **If you disagree with any disciplinary action, you are required to follow the internal complaint process, which is detailed in Section 9 of this handbook.**

Any employee conduct interfering with the effective operation of WPG's business is prohibited. The performance standards listed below, and others which may be established from time to time, are not all-inclusive. Rather, they are published to provide a general understanding of what WPG considers unacceptable conduct. These performance standards are merely examples of the types of misconduct for which employees may be disciplined or terminated.

WPG may impose disciplinary action in those instances where management decides it is appropriate. Disciplinary action includes, but is not limited to, oral warnings, written warnings, suspension, or termination. WPG retains the right to determine what discipline will be imposed in each individual situation. The fact that WPG has or has not utilized any of these steps in the disciplinary procedure does not set any precedent and should not be relied upon in future disciplinary situations by any employee.

Violation of any of the following performance standards may result in disciplinary action and/or immediate termination: **(NOTE: THIS LIST IS NOT ALL INCLUSIVE.)**

1. Failure to satisfactorily perform job duties;
2. Failure or refusal to follow the written or oral instructions of a supervisor or manager;
3. Insubordination;
4. Neglecting job duties and responsibilities;
5. Engaging in unauthorized personal business during work hours;
6. Falsifying or misrepresenting company or employment records;
7. Discourtesy or rudeness in dealing with WPG's employees and/or representatives of our clients or prospects;
8. Failure to give proper notice when unable to report for or continue work as scheduled;
9. Unexcused or excessive absenteeism;
10. Theft, abuse, or misuse of WPG's property, materials, or supplies;
11. Unauthorized use of WPG's property and equipment;
12. Threatening, harassing, or inflicting bodily harm on fellow employees or others at any time while on the job;
13. Making false and malicious statements concerning employees or the Company;

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 36 of 103

14. Intentionally discriminating against employees in violation of applicable laws and/or engaging in the harassment of, or retaliation towards any fellow employee;
15. Possession, use, purchase, consumption, transfer or sale of alcoholic beverages, controlled substances, or illegal drugs at any time during working hours, on WPG's premises or job site, or while representing WPG, or reporting to work under the influence of alcohol, controlled substances, or illegal drugs;
16. Violation of Company Safety Rules and Policy;
17. Violating any WPG policies, rules, regulations, or practices; and
18. Disruption of the employer's operation.
19. Violation of the law

3.1 REPORTS OF WRONGDOING (WHISTLEBLOWING)

WPG is committed to high standards of ethical and legal business conduct. It expects and encourages all employees to report any suspected violation of the law or WPG'S standards of conduct. This policy aims to provide guidance for employees to raise concerns about serious misconduct and to provide assurance that they will be protected from retaliation for making such reports.

This policy is intended to cover reports of:

- Incorrect Financial Reporting
- Any unlawful activity
- Activities in violation of WPG's Standards of Conduct
- Any other serious misconduct


Procedure

Employees who have concerns about serious misconduct should contact the Human Resources Manager, any officer of the company, or any member of the board of directors. Employees may report suspected illegal conduct in person or by voice mail, e-mail, in person, or the suggestion box in the HR/Safety Department.

Depending on the nature of the report, the HR Manager will investigate all reports of serious misconduct and will promptly correct any problems. Individuals with expertise in the area(s) of concern, will be used as needed.

Retaliation Prohibited

The company prohibits any retaliation against employees who provide information regarding serious misconduct or assist in an investigation of any violations of applicable laws.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 37 of 103

Any officer, employee, or agent, or any contractor or subcontractor of the company who retaliates against such employees is subject to discipline, up to and including termination.

Confidentiality

Information provided by the reporting employee will be treated as confidential and will be provided only to those who have the need for the information or when it is required in the course of investigating or resolving the concern.

Bad Faith or False Allegations

Reports made in bad faith and false information provided in the course of an investigation may lead to discipline, including termination.


3.2 WORKPLACE THREATS AND VIOLENCE

Nothing is more important to WPG than the safety and security of its employees. WPG has zero tolerance for violence in the workplace, which includes zero tolerance for acts of intimidation, harassment, threats of violence (whether express or implied), or acts of violence on WPG's premises, while on WPG business, or against another WPG employee, either during or after working hours. Any of the aforementioned acts of violence against employees, visitors, guests or other individuals by anyone will not be tolerated and must be reported to a supervisor immediately. Violations of this policy will lead to disciplinary action up to and including termination and potentially arrest and prosecution.

Bullying, including cyberbullying, is also prohibited. Behaviors that may be determined to be bullying include, but are not limited to:

- Use of hate words such as the 'n-word';
- Alienating or isolating an employee;
- Harassing or intimidating an employee;
- Making rude, condescending, insulting and demeaning statements to others;
- Using angry and/or hostile tones, shouting, throwing things or slamming doors when displeased;
- Berating staff and colleagues in front of others.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on WPG property shall be removed from the premises as quickly as safety permits, and shall remain off WPG premises pending the outcome of an investigation. WPG will initiate an appropriated response. This response may include disciplinary action, suspension and/or discharge from any business relationship, reassignment of job duties, suspension or termination from employment, and/or criminal prosecution of the person or persons involved.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 38 of 103

No existing WPG policy, practice, or procedure should be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing.

All WPG personnel are responsible for notifying their supervisor or another member of the management team of any threats they have witnessed, received, or been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which may be regarded as threatening, or violent, when that behavior is job related or might be carried out on a company controlled site, or is connected to company employment. Employees are responsible for making this report regardless of the relationship between the individual who initiated the threat or threatening behavior and the person or persons who were threatened or were the focus of the threatening behavior.


All individuals who apply for or obtain a protective or restraining order, which lists the company location as being a protected area, must provide to Human Resources a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent. WPG understands the sensitivity of the information requested and has developed confidentiality procedures, which recognize and respect the privacy of the reporting employee(s).

3.3 COMMITMENT TO A SAFE WORKPLACE

WPG is committed to safety in all areas of the organization and our goal is to comply with the Montana Safety Culture Act and the Occupational Safety & Health Act of 1970. These Acts require that employers provide a safe and healthful working environment and employees comply with occupational safety and health standards and all rules, regulations, and orders contained within the Acts, which are applicable to their own actions and conduct.

We believe that safety must function as an integral part of, and in no manner separate from, the operation of the Company. In recognition of this and in the interest of prudent management practices, our goal is to:

- Maintain a safe and healthful working environment and to comply with the company's legal obligations.
- Consistently adhere to proper operating practices and procedures, which are designed to prevent injury, illness, and loss of assets.
- Comply with the requirements of federal, state, and local safety and health codes to insure the wellbeing and safety of all employees

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 39 of 103

- Provide training and education to make safety awareness part of each worker's satisfactory job performance.

In order to achieve these goals, employees may receive training on the use of equipment, proper and safe operating procedures, and site/task specific job functions. Periodic safety training sessions may be conducted to maintain employee awareness.

All employees are responsible for exercising maximum care, good judgment, and shall comply with established procedures in operating safely and preventing accidents. Unsafe conditions, equipment, or practices shall be reported to the supervisor or the Safety Department immediately. Each employee is expected to abide by all safety rules and procedures, shall wear any and all personal protective equipment required and provided by the Company, and attend training sessions when scheduled. Failure to attend will result in disciplinary action up to and including termination.

Our safety rules have been written with you in mind. Please follow the rules and help WPG ensure a safe working environment.


3.4 SAFETY RULES MUST BE FOLLOWED

Employee safety is a primary concern at WPG. Therefore, any violation of safety rules and/or violation of general safe working practices are grounds for disciplinary action, up to and including termination


The employee and the company have separate but dependent responsibilities with respect to achieving safe and healthful working conditions. Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued which are applicable to his/her own actions and conduct. Employees will be responsible for reading and applying this section.

All employees must abide by the following rules:

1. Be properly trained according to relevant procedures before starting a job.
2. If the employee believes his/her condition may negatively impact the personal safety of the employee or others, the employee should report such condition to the employee's immediate supervisor.
3. Park personal vehicles in designated parking areas away from freight doors and dumpsters.
4. Before beginning work, check work area, vehicles and equipment for unusual occurrences (i.e., vandalism, damaged equipment, etc.). Report tampering or theft of tools, equipment and materials.
5. Not operate any machinery, equipment or tool unless properly instructed in its use.
6. Never turn on electricity, air, water, gas, or set in motion any machinery without first carefully checking to see if anyone could be injured.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 40 of 103

7. Have a valid Montana driver's license before operating a licensed company vehicle or before operating any vehicle while on company time or for company related purposes.
8. Be familiar with the location of the nearest first-aid kit and fire extinguisher, and know the identity of the nearest first-aid person on the job.
9. Notify supervisor if work activities require performing a task along, in or around an isolated/hazardous location.
10. Wear issued safety equipment as instructed. Shirts must be worn at all times. Sunburn is not considered to be a job-related injury.
11. Report all accidents, near accidents and injuries to his/her supervisor immediately. It is both the employee and the supervisor's responsibility to see that prompt medical attention is given to all injuries. Supervisors are to report all injuries to the Safety Department or HR Department immediately.
12. Avoid any kind of horseplay, including the reckless operation of vehicles, equipment and air hoses, and throwing of objects.
13. Smoking or vaping of any kind is not allowed in the building.
14. Burning candles are not allowed in any area of the building.
15. Use only approved tools, equipment, and materials that are in good, safe condition. Report any defective tool and/or defective equipment to a supervisor.
16. If shoes are greasy, muddy or otherwise slippery, clean them before climbing up or down any ladder, equipment or smooth surface.
17. Place all air hoses, cables and chains, etc., so that they will not be a tripping hazard.
18. Keep hands, arms, legs and loose clothing away from moving fans or fan belts and any moving parts of equipment. Long hair must be properly secured in a manner that protects the wearer from getting hair entangled in machinery.
19. Use proper lifting procedures:
 - a. Bend legs, keeping back vertically straight.
 - b. Hold the object firmly, and close to the body. Lift using leg muscles, not the weaker back muscles.
 - c. Lift slowly and do not jerk or twist. Never lift while in an awkward position.
 - d. Set the object down in the same manner, without putting strain on the back.
 - e. Get help if the load is too heavy to lift comfortably or is too bulky to carry safely.
20. Know or ask for the safest method of doing the job. When in doubt, always ask before proceeding. Think first; then proceed safely. Each worker is responsible for his or her safety as well as the safety of others. All employees on the job must work together for this common goal. Everyone must warn others when their safety is in danger, inform other workers when they are committing a hazardous act, and help train new employees in safe methods of operation, and make them safety-conscious. It may save a life.
21. Follow any new guidelines issued. From time to time, the company may issue safety bulletins, which will cover specific conditions.
22. Exercise due care in the use of company property and use such property only for authorized purposes. Negligence in the care and use of company property may be considered cause for termination.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 41 of 103

23. Never report to work under the influence of alcohol or drugs or use them while on the job. Violation of this rule may be cause for immediate termination.
24. Do not attempt to operate a machine that is locked or tagged out. Contact your supervisor for instructions.
25. Ensure that all secondary containers are properly labeled for hazardous materials. If a container is not labeled properly, or a label has become unreadable, contact the Safety Department for a proper label.
26. Use common sense. Obviously, it is impossible to cover all the hazards involved in all operations. Therefore, the best safety is "common sense."

3.5 COMPUTER AND ELECTRONICS ACCEPTABLE USE POLICIES

1. Introduction

Technology is an integral part of business at Wood's Powr-Grip Co., Inc. The company has made a substantial investment in human and financial resources to create and maintain these systems. The following policies and directives have been established in order to:

- a. Protect this investment.
- b. Safeguard the information contained within these systems.
- c. Reduce business and legal risk.
- d. Protect the good name of the company.

2. Violations

Violations may result in disciplinary action in accordance with company policy. Failure to observe these guidelines may result in disciplinary action by the company depending upon the type and severity of the violation, whether it causes any liability or loss to the company, and/or the presence of any repeated violation(s).


3. Administration

The Information Technology Department (IT Department) is responsible for the administration of this policy.

4. Statement of Responsibility

General responsibilities pertaining to this policy are set forth in this section. The following sections list additional specific responsibilities.

- a. Manager responsibilities. Managers and supervisors must:

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 42 of 103

- a. Ensure that all appropriate personnel are aware of and comply with this policy.
- b. Create appropriate performance standards, control practices, and procedures designed to provide reasonable assurance that all employees observe this policy.
- b. IT Department responsibilities. The IT Department must:
 - a. Develop and maintain written standards and procedures necessary to ensure implementation of and compliance with these policy directives.
 - b. Provide appropriate support and guidance to assist employees to fulfill their responsibilities under this directive.

5. The Internet and E-mail

The Internet is a very large, publicly accessible network that has millions of connected users and organizations worldwide. One popular feature of the Internet is e-mail.


Policy

Access to the Internet is provided to employees for the benefit of Wood's Powr-Grip and its customers. Employees are able to connect to a variety of business information resources around the world. Conversely, the Internet is also replete with risks and inappropriate material. To ensure that all employees are responsible and productive Internet users and to protect the company's interests, the following guidelines have been established for using the Internet and e-mail.

- a. Wood's Powr-Grip's intentions for publishing an Acceptable Use Policy are not to impose restrictions that are contrary to the Company's established culture of openness, trust and integrity.
- b. Wood's Powr-Grip is committed to protecting company employees, partners and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.
- c. Computing equipment, (including computers, phones, tablets), company credentials, software, licenses, storage media (including hard drives and flash drives), and any data transmitted over the WPG network are the property of Wood's Powr-Grip.
- d. These systems are to be used for business purposes in serving the interests of the company, and of our clients and customers in the course of normal operations.
- e. Effective security is a team effort involving the participation and support of every employee and affiliate who deals with information and/or information systems. It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.
- f. To ensure optimal network performance and prioritize critical business operations, employees are expected to limit bandwidth usage when requested by the IT Department.

Acceptable use

Employees using the Internet are representing the company. Employees are responsible for ensuring that the Internet is used in an effective, ethical, and lawful manner. Examples of acceptable use are:

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 43 of 103

- a. Using Web browsers to obtain business information from commercial Web sites.
- b. Accessing databases for information as needed.
- c. Using e-mail for business contacts.

Unacceptable use

Employees must not use the Internet for purposes that are illegal, unethical, harmful to the company, or nonproductive. Examples of unacceptable use are **(this list is not all inclusive)**:

- a. Sending or forwarding chain e-mail, i.e., messages containing instructions to forward the message to others.
- b. Broadcasting e-mail, i.e., sending the same message to more than 10 non-business/company recipients or more than one distribution list.
- c. Conducting a personal business using company resources during paid work hours/expected work periods.
- d. Transmitting any content that is offensive, harassing, or fraudulent.

6. Email / Electronic Communication Use Policy

Purpose


To prevent tarnishing the public image of Wood's Powr-Grip. When electronic communications are sent/utilized from Wood's Powr-Grip the general public will tend to view that message as an official policy statement from the Wood's Powr-Grip.

Scope

This policy covers appropriate use of any electronic communications sent from any Wood's Powr-Grip account and applies to all employees, vendors, and agents operating on behalf of Wood's Powr-Grip.

Policy

- a. *Prohibited Use:* Wood's Powr-Grip electronic communication systems shall not be used for the creation or distribution of any disruptive or offensive messages, including, but not limited to, offensive comments about race, gender, hair color, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. Employees who receive any electronic communications with this content from any Wood's Powr-Grip Co., Inc. employee should report the matter to their supervisor immediately.
- b. *Personal Use:* Using a reasonable amount of Wood's Powr-Grip Co., Inc. resources for personal communications is acceptable. These restrictions also apply to the forwarding of inappropriate or offensive email received by a Wood's Powr-Grip employee.
- c. *Monitoring.* Wood's Powr-Grip employees shall have no expectation of privacy in anything they store, send or receive on the company's electronic communication systems. Wood's Powr-Grip may monitor all traffic without prior notice.
- d. *Enforcement.* Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 44 of 103

Definitions


- a. "Electronic Communication(s)": Any exchange of information via email or instant messaging applications between multiple accounts.
- b. "Email": The electronic transmission of information through a mail protocol such as SMTP, HTTP, POP or IMAP. Typical email clients include Gmail, Hotmail, and Microsoft Outlook.
- c. "Forwarded email": Email resent from a Wood's Powr-Grip email address to another address.
- d. "Chain email or letter": Email sent to successive people. Typically, the body of the note has direction to send out multiple copies of the note and promises good luck or money if the direction is followed.
- e. "Instant Messaging/Instant Messenger": Applications such as Elevate, Teams, Zoom, etc. that sends messages instantly to a recipient
- f. "Sensitive information": Information is considered sensitive if it can be damaging to Wood's Powr-Grip or its customers' reputation or market standing.
- g. "Virus warning": Email containing warnings about virus or malware. The overwhelming majority of these emails turn out to be a hoax and contain bogus information usually intent only on frightening or misleading users.
- h. "Unauthorized Disclosure": The intentional or unintentional revealing of restricted information to people, both inside and outside Wood's Powr-Grip Co., Inc., who do not have a need to know that information.

7. Downloads

To protect our company's IT infrastructure from security threats, employees must exercise caution and sound judgment when downloading any material onto company computers. Only IT-approved software should be downloaded and installed. It is essential to ensure that any downloads come from reputable, trusted websites.

Avoid downloading attachments or clicking on links from unsolicited emails and report any suspicious emails to the IT department immediately. Use of WPG computing resources for personal reasons should be on a limited basis and only at appropriate times. If it is absolutely necessary to use company resources, personal software or files should not be uploaded onto company servers- all personal data should remain on the user's computer at all times. The IT department may monitor downloads and internet activity to ensure compliance, and non-compliance can result in disciplinary action.

Employees should also regularly update software as directed by IT to maintain the latest security patches. By using company computers, employees agree to comply with these guidelines. The company reserves the right to restrict access or take disciplinary measures in response to policy violations. For any questions or further clarification regarding this policy, please contact the IT department.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 45 of 103

8. Copyrights

Employees using the Internet are not permitted to copy, transfer, rename, add, or delete information or programs belonging to others unless given express permission to do so by the owner. Failure to observe copyright or license agreements may result in disciplinary action by the company and/or legal action by the copyright owner.

9. Monitoring

All data created, sent, or retrieved over the WPG computer network and/or internet are the property of the company and may be regarded as public information. Wood's Powr-Grip Co., Inc. reserves the right to access the contents of any data sent over its facilities if the company believes, in its sole judgment, that it has a business need to do so.


All communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

10. Computer Viruses

To safeguard WPG's IT infrastructure and data integrity, employees must follow specific guidelines to protect against computer viruses and other malicious software. Adherence to the following guidelines is crucial to maintaining a secure and efficient working environment:

Guidelines

1. Antivirus Software:
 - a. Ensure antivirus software is installed and kept up to date on all company devices.
 - b. Perform regular scans as scheduled by the IT department.
2. Safe Browsing:
 - a. Avoid visiting untrustworthy websites or downloading software from unverified sources.
 - b. Use company approved browsers and security settings while accessing the internet
3. Software Updates:
 - a. Regularly install updates for operating systems and applications as directed by the IT department to ensure the latest security patches are applied.
4. Incident Reporting:
 - a. Immediately report any signs of a virus infection, such as unusual computer behavior, to the IT department.
 - b. Follow IT department instructions for handling potential virus infections
5. Training and Awareness:
 - a. Participate in regular training sessions provided by the company on virus protection and cybersecurity best practices.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 46 of 103

11. Computer Equipment Use

The purpose of this policy is to outline the acceptable use of computer equipment at Wood's Powr-Grip. These rules are in place to protect the employee and the company. Inappropriate uses expose the company to risks including virus attacks, compromise of network systems and services, and legal issues.

Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at Wood's Powr-Grip, including all personnel affiliated with third parties. This policy applies to all equipment that is owned or leased by the company.

General Use and Ownership

While Wood's Powr-Grip's IT Department desires to provide a reasonable level of privacy, users should be aware that the data they create on the corporate systems remains the property of Wood's Powr-Grip. Because of the need to protect the company's network, management cannot guarantee the confidentiality of information stored on any network device belonging to Wood's Powr-Grip.

Employee Responsibility

Employees are responsible for exercising good judgment regarding the reasonableness of personal use. Individual departments are responsible for creating guidelines concerning personal use of Internet/Intranet/Extranet systems. In the absence of such policies, employees should be guided by departmental policies on personal use, and if there is any uncertainty, employees should consult their supervisor or manager.


Laptop computers

All company laptop computers should be secured with a password-protected screensaver with the automatic activation feature set at 10 minutes or less, or by logging-off when the host will be unattended. Because information contained on portable computers is especially vulnerable, special care should be exercised. Physical security as well as data security is the responsibility of the assigned user.

Employee Responsibilities

These directives apply to all employees:

- Employees shall not knowingly introduce a computer virus into company computers.
- Employees shall not load software or media of unknown origin.
- Any employee who suspects that his/her workstation has been infected by a virus shall immediately disable the network connection on the computer, and contact the IT Department, but the leave computer POWERED ON. If the employee does not know how to disconnect network access from the PC, the IT Department will assist.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 47 of 103

12. Access Codes and Passwords

The confidentiality and integrity of data stored on company computer systems must be protected by access controls to ensure that only authorized employees have access. This access shall be restricted to only those capabilities that are appropriate to each employee's job duties.

IT Department Responsibilities

The IT Department shall be responsible for the administration of access controls to all company computer systems. The IT Department will process adds, deletions, and changes upon receipt of a written request from the end user's supervisor. Deletions may be processed by an oral request prior to reception of the written request. The IT Department will maintain a list of administrative access codes and passwords and keep this list in a secure area.

Employee Responsibilities

Each employee:

- Shall be responsible for all computer transactions that are made with his/her User ID and password.
- Shall not disclose passwords to others unless the account is being accessed or shared between multiple people. Passwords must be changed immediately if it is suspected that they may have become known to others. Passwords should not be recorded where they may be easily obtained.
- Should use passwords that will not be easily guessed by others.
- Shall not use someone else's credentials (username, password, etc.) to access information you would not otherwise be able to access.
- Shall not attempt to learn another user's credentials (e.g. watching or recording video of them type their password, installing a keylogger, sniffing their WiFi traffic, etc.).
- Shall not attempt to guess passwords or otherwise gain access to accounts or logons that you aren't authorized to access.


Supervisor's Responsibility

Managers and supervisors should notify the IT Department promptly whenever an employee is hired or being transferred to or from their department, in situations where computer equipment and/or computer access, will be necessary, or no longer necessary, for this employee to perform their duties.

Human Resources Responsibility

The HR Department will notify the IT Department in a timely manner of employee terminations. Involuntary terminations must be reported concurrent with the termination.

13. Physical Security

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 48 of 103

It is company policy to protect computer hardware, software, data, and documentation from misuse, theft, unauthorized access, and environmental hazards.

Employee Responsibilities

The directives below apply to all employees:

- Computer equipment must be protected by a surge protector, or better yet, an Uninterruptible Power Supply (UPS). These will be issued out by the IT Department.
- Environmental hazards to hardware such as food, smoke, liquids, high or low humidity, and extreme heat or cold should be avoided.
- Since the IT Department is responsible for all equipment installations, disconnections, modifications, and relocations, employees should not perform these activities, unless given authorization to do so by the IT Department. This does not apply to temporary moves of portable computers for which an initial connection has been set up by IT.
- Employees shall not take shared portable equipment such as laptop computers out of the plant without the informed consent of their department manager. Informed consent means that the manager knows what equipment is leaving, what data is on it, and for what purpose it will be used.
- Employees should exercise care to safeguard the valuable electronic equipment assigned to them. Employees who neglect this duty may be accountable for any loss or damage that may result.

14. Copyrights and License Agreements

It is Wood's Powr-Grip's policy to comply with all laws regarding intellectual property.

Legal Reference

Wood's Powr-Grip and its employees are legally bound to comply with the Federal Copyright Act (Title 17 of the U. S. Code) and all proprietary software license agreements. Noncompliance can expose Wood's Powr-Grip and the responsible employee(s) to civil and/or criminal penalties.

Scope


This directive applies to all software that is owned by the company, licensed to the company, or developed using Wood's Powr-Grip resources by employees or vendors.

IT Responsibilities

The IT Department will:

- Maintain records of software licenses owned by Wood's Powr-Grip Co., Inc.
- Periodically (at least annually) scan company computers to verify that only authorized software is installed.

Potential Penalties

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 49 of 103

Violations of copyright law expose the company and the responsible employee(s) to the following civil penalties:

- a. Liability for damages suffered by the copyright owner
- b. Profits that are attributable to the copying

Violations of copyright law that are committed "willfully and for purposes of commercial advantage or private financial gain (Title 18 Section 2319(b))," expose the company and the employee(s) responsible to the following criminal penalties:

- a. Fines up to \$250,000 for each illegal copy
- b. Jail terms of up to five years

15. AI (Artificial Intelligence) and LLM (Large Language Models)


The purpose of the AI and LLM Usage Policy is to establish the acceptable use of third-party AI and LLM technologies such as ChatGPT, Google Bard, DALL-E, and Midjourney within the operations of Wood's Powr-Grip.

Guidelines

- a. Treat all WPG and customer information as highly confidential. Do not disclose or share any sensitive or proprietary data during interactions with AI or LLM platforms. Examples include passwords and other credentials, customer addresses, protected health information, personnel materials, information from documents marked as Confidential, Sensitive, or Proprietary, or any other non-public Company information that might be of use to competitors or harmful to the Company or its customers or employees if disclosed.
- b. Ensure that AI and LLM platform interactions occur over secure channels and on systems with appropriate security measures to protect information from unauthorized access or disclosure.
- c. Usage must adhere to all relevant laws, regulations, and industry standards, such as data protection and privacy regulations and financial industry standards.
- d. AI and LLM platform usage and/or integration into existing tools will require review and approval by the IT Department.
- e. Exercise caution when relying on AI and LLM responses for critical decisions or actions. Use these models as a support tool rather than a sole source of information.

3.6 BUSINESS RELATED CELL PHONE USAGE

The purpose of this policy is to establish guidelines for issuing company cell phones to certain positions and providing a routine payroll stipend to certain positions for the use of their personal cell phones for work-related purposes. This policy also defines expectations with regards to cell

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 50 of 103

phone usage for work-related purposes. This policy aims to ensure effective communication, increase productivity, and maintain security.

SCOPE

This policy applies to all employees who meet the criteria for receiving a company-issued cell phone or a payroll stipend for using their personal cell phone for work purposes.

COMPANY ISSUED CELL-PHONES

ELIGIBILITY CRITERIA

Positions: Company cellphones will be issued to employees in certain positions where job responsibilities require regular and reliable mobile communication. This includes, but is not limited to:


- Executive Management
- Managers
- A select few other individuals as designated by Executive Management

APPROVAL PROCESS

Eligibility for a company cellphone must be approved by the employee's direct supervisor and the HR Manager.

USAGE GUIDELINES FOR COMPANY ISSUED CELLPHONES

1. **Business Use:** Company cell phones are to be used primarily for business purposes. Personal use should be minimal and not interfere with work responsibilities. Should personal use of a company provided cell phone be assessed as excessive, the employee to whom the phone is assigned may be subject to disciplinary action, up to and including phone revocation or employment termination.
 - a. The employee to whom a phone is assigned assumes all risks associated with that phone's use. At no time will the cell phone be used in an unsafe manner, or in a way that is in violation of any local, state or federal laws, or company policy.
2. **Accessibility:** Employees with company cell phones are expected to be always accessible via their phone whenever they are not engaged in some type of work-related activity, such as a meeting, working with machinery, driving, etc., where it would be poor etiquette or dangerous to acknowledge the phone.
3. **Data Security:** Employees must follow company policies on data security, including the use of passwords, encryption, and secure connections.
4. **Maintenance and Care:** Employees are responsible for the proper care and maintenance of their company-issued cell phones. Any damage or loss must be reported immediately to the IT department. If the loss or damage is due to employee abuse, misuse or negligence, the employee is responsible for replacing the phone, and any other damage done as a result.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 51 of 103

- a. Employees are strongly encouraged to utilize some form of protective covering and/or case for company issued cell phones.
5. **Ownership:** Company provided cell phones are, at all times, company property. WPG retains the right to monitor, examine, or recall the phone at any time.
 - a. WPG also reserves the right to all phone numbers assigned to phones owned by WPG. Any individual will need written permission from Executive Management to transfer a phone number from WPG ownership to a personal plan.
6. **Return of Company Cell Phones:** Employees must return their company issued cellphone to the HR Manager immediately upon termination of employment or if their job role changes and they are no longer eligible for a company cellphone.
 - a. The cellphone must be in good, working condition. Any damages or loss may result in the employee being held financially responsible.

PAYROLL STIPENDS FOR CELL PHONES

ELIGIBILITY CRITERIA

Employees who are required to use their personal cell phones for work-related communication may be eligible for a payroll stipend. This includes, but is not limited to:

- Executive Management
- Managers
- Directors
- Supervisors
- Assistant Supervisors
- A select few other people designated by Executive Management

STIPEND AMOUNT


The stipend amount will be determined by Executive Management and will be reviewed annually.

APPROVAL PROCESS

Eligibility for the payroll stipend must be approved by the employee's direct supervisor and the HR Manager. The employee's direct supervisor will then be responsible for informing the payroll department of the decision, and coordinating an effective date, as well as getting the employee's phone number added to appropriate documentation and publications.

RESPONSIBILITIES OF EMPLOYEES RECEIVING A CELLPHONE PAYROLL STIPEND

1. Comply with all company policies regarding mobile device usage.
2. Ensure their personal cellphones are adequately maintained and operational.
3. Be available via cell phone at all times during all hours worked and whenever they are not engaged in some type of work-related activity, such as a meeting, working with

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 52 of 103

machinery, driving, etc., where it would be poor etiquette or dangerous to acknowledge the phone.

- a. There is no requirement or expectation by WPG that hourly employees, who receive a cell phone stipend, will monitor or be accessible on their personal phone for work-related purposes, during non-working hours.

3.7 SOCIAL MEDIA POLICY AND GUIDELINES

At Wood's Powr-Grip, we recognize the importance of social media as a tool for communication, networking and personal expression. While we encourage our employees to engage with social media platforms responsibly, it's crucial to maintain professionalism, protect company interests, and uphold confidentiality. This policy outlines guidelines and expectations regarding social media usage for all employees of Wood's Powr-Grip. This policy covers all social media platforms, including but not limited to, Facebook, X (formerly Twitter), LinkedIn, Instagram, TikTok, Snapchat, YouTube and personal blogs.

Use of the social media during work hours, whether using Company computers or otherwise, for purposes other than directly related to business matters is not allowed, and violations will be subject to discipline up to and including termination of employment depending on the severity and frequency of the violation(s).


Use of the social media during nonworking hours in a manner which is not lawful may give rise to discipline up to and including termination of employment. Unlawful use of social media includes, but is not necessarily limited to using social media to:


- Harassing co-employees or customers of Wood's Powr-Grip
- Disclosing company proprietary information, including the name or sensitive facts relating to company customers, financial data, or any other information not covered by non-disclosure agreements (NDA's); or
- Threatening or intimidating co-employees or customers of Wood's Powr-Grip

Yes, this policy applies to an employee's social media posts, tweets, etc., that are about or may be seen by employees, customers, clients, vendors, competitors, etc.

Yes, the employee's Facebook account may be configured as private. But if co-workers or other stakeholders are connected and see the posts, the posts are eligible for corrective action.

Remember, what is posted by you on social media can be and is often misconstrued and is permanent and can be held to the same legal standards as traditional communications. Think before posting matters using social media.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 53 of 103

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 54 of 103

SECTION 4: WAGE AND SALARY POLICIES

4.1 PAY PERIODS & PAY CHECKS

The pay period is bi-weekly (two weeks in length, from Sunday to Saturday). Paydays are on alternating Fridays, following the end of a pay period. If payday falls on a holiday, paychecks will be issued on the preceding workday.


An itemized statement will accompany each paycheck, which will include the gross wages for the pay period, and show all statutory and voluntary deductions. After you review your pay stub and deductions, any mistakes and/or improper deductions should be reported immediately. The company will attempt to promptly review the complaint and, if valid, reimbursement will be issued within a reasonable time frame.

Employee's may be paid by check or through direct deposit of funds to either a savings or checking account at their bank of choice, providing the bank has direct deposit capability. Deposits may be made to multiple accounts. Any financial institution fees associated with multiple deposits, the fees will be the responsibility of the employee. To activate direct deposits, you will be required to complete and sign a Direct Deposit Authorization form, and provide it to Human Resources or Payroll.

Employees who choose to receive paper checks may pick them up in person. Paychecks will, whenever possible, be available on paydays. If employees are unable to personally pick up their paycheck, other arrangements must be made in advance or paychecks/paycheck stubs will be held securely with the Administrative Office until it can be physically picked up. A designated person may pick up an employee's paycheck, only after the employee has signed a wage permission slip, to be filed with Human Resources, designating that person as authorized to pick up the employee's paycheck. The designated person will have to sign a paycheck release form each time a paycheck is picked up.

4.2 PAY ADVANCES

While WPG acknowledges that pay advances are going to be necessary from time to time, it is an administrative hassle to complete the proper paperwork and track repayment. For this reason, pay advances are discouraged and the following restrictions apply:

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 55 of 103

- The total amount available to any employee each year is \$1000.00. The year, or 12 consecutive month period, begins the day the pay advance is issued.
- The amount available in any given pay advance is the lesser of:
 - Total wages an employee has accumulated for a pay period, plus Vacation due, or
 - \$1000.00
- The minimum amount available will be \$150.00.
- As a general rule, no pay advances will be available to probationary employees.
- The company reserves the right to deny a pay advance to anyone, and such decisions are made totally at the discretion of executive management. Within and as a part of this discretion, executive management is under no obligation to either consider a request for an advance or explain its reasoning for either granting or denying any such request.

4.3 LOANS

Supervisors are not allowed to lend money to or borrow money from employees.


4.4 OVERTIME

When business conditions require, employees may be needed to work overtime. When this occurs, the employee's supervisor will make every effort to provide timely advance notice. If overtime is required, a request for volunteers will be communicated to departmental employees first and then to other departments. In rare circumstances, if there are not enough volunteers to cover the required overtime hours, management reserves the right to assign mandatory overtime.

For purposes of overtime pay, employees are classified as exempt or nonexempt. Exempt employees are not eligible for overtime pay. Nonexempt employees receive overtime pay for all hours worked over 40 hours in a work week.

The work week begins at 12:01 a.m. on Sundays and ends at 12:00 midnight on the following Saturday. Hours worked do not include vacation, personal leave, extended illness, holiday, or other leave or time away from work. Overtime hours worked do not add to or in any way affect earned vacation, personal or extended illness leave days, or any other company benefit. The overtime rate is one and one-half (1 ½) times the employee's regular rate of pay.


Your supervisor must approve all overtime in advance. Employees working overtime without approval can be subject to disciplinary action, up to and including termination.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 56 of 103

4.5 FINAL PAY

In compliance with Montana law (MCA §39-3-205), when you voluntarily terminate or are involuntarily terminated prior to payday, your final pay will be issued on the next regularly scheduled payday, or 15 days from the date of the actual separation, whichever occurs first. Outstanding loans and/or pay advances will be deducted from the final paycheck.

NOTE: All company property shall be returned to WPG upon termination of employment.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 57 of 103

SECTION 5: LEAVE BENEFITS

The benefits described here supersede all prior policies and procedures and may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.

5.1 PAID HOLIDAYS

Holiday Pay is not legally required. It is a benefit voluntarily provided by the company under certain conditions. Holiday Pay will be paid according to a Holiday Pay Schedule prepared annually by management. The terms and conditions of that schedule are incorporated herein by reference.


Full-Time and Part-Time Employees are eligible for Holiday Pay. Temporary/Seasonal employees are generally ineligible for holiday pay. However, if a Temporary/Seasonal Employee works a fully scheduled two weeks immediately prior to AND immediately following a holiday, that temporary/seasonal employee will receive holiday pay for that holiday, for the number of hours regularly scheduled for that day (if it falls on a regularly scheduled workday).

Eligible employees will receive holiday pay for the number of hours they are regularly scheduled for each holiday. If an employee is not regularly scheduled to work on the day of the week that a holiday falls on, they will not receive any holiday pay for that day.

Holiday Pay will not count as hours worked for purposes of determining over-time hours and over-time pay.

If standard paid holidays fall during an employee's vacation, the holiday will not be counted against the employee's vacation.

If an employee is absent from any part of that employee's last scheduled shift before a holiday or first scheduled shift immediately after a holiday, for any reason other than advanced approved company leave, that employee will not receive pay for that holiday. Loss of Holiday Pay will result from any absence which does not qualify as approved company leave. Such absences include but are not limited to being gone from work under any one of the following conditions: unapproved leave of any kind; worker's compensation; leave while collecting disability benefits; and, unpaid personal leave of absence.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 58 of 103

5.2 VACATION PAY

Vacation accrual begins on the first day of full- or part-time employment. Vacation is accrued according to the schedule set forth in this policy. Vacation time can only be used after an employee has completed six-months of consecutive active employment. Vacation leave will not be earned during an unpaid leave of absence, except in circumstances where it is legally required. Employees accrue vacation leave each pay period, as follows:


COMPLETED YEARS OF SERVICE	ACCRUAL RATE PER EACH FULL HOUR WORKED	ANNUAL VACATION ACCRUAL (BASED ON AN EMPLOYEE WORKING 2080 PAID HOURS PER YEAR OR 40 HOURS PER WEEK)	MAXIMUM ALLOWABLE HOURS IN VACATION BANK
1 – up to 6 completed years of employment	.0385	80	120
6 or more completed years of employment	.0576	120	160

Employees in active pay status for any part of a pay period earn vacation for that pay periods for all straight-time (non-overtime) hours worked, and all approved Vacation, Personal/Sick and Extended Illness leave hours taken. Employees taking absent without pay or leave without pay or unpaid FMLA/LOA leave hours, earn no vacation for the AWOP/LWOP/unpaid FMLA/LOA hours.

Vacation pay is computed and paid at each employee's straight-time hourly pay rate, plus any shift differentials they may be earning, at the time it is taken. If a holiday falls during the employee's vacation, the day will be charged to holiday pay, if applicable, rather than to vacation pay. For full-time employees, Vacation pay must be taken in minimum increments of one day. For part-time employees, Vacation pay may be taken in increments of 15 minutes.

Employees may not accumulate above the maximum number of hours designated in the chart above, as maximum allowable hours in Vacation bank for their years of employment. When vacation is taken and the total accrued amount falls below the maximum, vacation accrual will begin again. If the available vacation time is not used by the end of a calendar year, accrued, unused leave below the maximum accrual carries over to the next year.

Wood's Powr-Grip encourages employees to use available vacation time. Employees are encouraged to submit vacation leave requests as soon as vacation dates are determined. A leave request for vacation time requires a written leave request to be submitted to the office at least two (2) working days before vacation is taken. All requests must be approved in advance by the

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 59 of 103

employee's supervisor. Repeated violations may result in disciplinary action being initiated. The advance notification requirement may be waived if the employee becomes ill and has no remaining Personal/Sick Leave to use. Under such circumstances the employee must provide the notice required for use of Personal/Sick Leave. Vacations will be granted in accordance with staffing needs.

Employees are required to take their earned vacation in order to receive vacation pay. No payments will be made in lieu of taking vacation, except for accrued, unused vacation time at the time of termination.

If you resign your position with the company or are discharged from employment, you will be paid all earned and unused vacation time in your bank as of the last date you are physically at work or at the time your resignation is officially submitted, whichever is first.

5.3 PERSONAL/SICK LEAVE


Wood's Powr-Grip recognizes that employees will occasionally need time off from work for circumstances that may be unplanned. For these purposes, regular full-time employees will be provided Personal/Sick Leave.

Part-time and temporary employees are not eligible for Personal/Sick Leave. If an employee changes employment status from full-time to part-time, they immediately forfeit any and all hours of Personal/Sick Leave the employee may have.

Beginning on their first day of employment, Personal/Sick Leave will accrue at the following rates:

COMPLETED YEARS OF SERVICE	ACCRUAL RATE PER EACH FULL HOUR WORKED*	MAXIMUM ALLOWABLE HOURS IN PERSONAL/SICK LEAVE BANK
1 – up to 20 completed years of employment	.0308	64
20 or more completed years of employment	.05	104

- “Full hour worked”, for the purposes of this policy only, is defined as: All straight-time (non-overtime) hours worked, and all approved Vacation, Personal/Sick and Extended Illness leave hours taken. Employees taking absent without pay or leave without pay or unpaid FMLA/LOA leave hours, receive no Personal/Sick leave for the AWOP/LWOP/unpaid FMLA/LOA hours.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 60 of 103

Employees are entitled to use their accrued, unused paid Personal/Sick Leave beginning on the 1st day after they have completed six consecutive months of employment. Personal/Sick Leave balances will roll over from year to year up to a maximum of 64 hours allowed in an employee's Personal/Sick Leave bank at any given time. Once an employee passes their 20-year anniversary with Wood's Powr-Grip, they will be allowed a maximum of 104 hours of personal/sick leave in their personal/sick leave bank.


While this leave is primarily intended to be used for unanticipated absences, each employee is free to use it at his/her discretion as long as all requirements of this handbook regarding the use of such leave are met. With regard to the use of this leave for personal/sick leave, this policy is intended to cover, but is not limited to covering the following circumstances:

- Physical or mental illness, injury, or medical condition(s);
- Obtaining diagnosis, care, or preventive care from a health care provider;
- Caring for a child, a parent, a spouse, a domestic partner, or any other individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship who has any of the conditions or needs for diagnosis, care, or preventive care described in paragraphs [1] or [2] immediately above or is otherwise in need of care; or
- domestic violence, sexual assault, or stalking, if the time absent from work is for the purposes otherwise described in paragraphs [1] and [2] immediately above, to obtain counseling, to seek relocation, to seek assistance from a victim services organization, to take related legal action, including preparation for or participation in any related civil or criminal legal proceeding, or to assist an individual related to the employee as described in paragraph [3] immediately above in engaging in any of these activities.

The company reserves the right to require documentation from a health care professional to verify the need for personal/sick leave and/or to authorize the employee to return to work.

Personal/Sick Leave is not considered an earned benefit in the same sense as Vacation. It is granted to employees in anticipation of need without being earned. Unused Personal/Sick Leave does not qualify for monetary reimbursement at any time. Immediately upon official notice of resignation, employees forfeit any unused Personal/Sick Leave and Personal/Sick Leave may not be used in lieu of two-weeks' notice. Personal/Sick Leave will not be paid out to the employee upon termination.

Non-exempt employees may take sick/personal leave in fifteen-minute increments. Exempt employees will be docked for sick/personal leave in full day increments only. When reasonable, this time must be requested in advance.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 61 of 103

5.4 EXTENDED ILLNESS LEAVE BANK

General Provisions

Extended Illness Leave (EIL) is not considered an earned benefit in the same sense as vacation. It is provided to serve as protection against an employee's serious long-term illness/injury. When an eligible, full-time employee is ill, time paid for sick leave is normally paid out of the employee's personal/sick leave or vacation, provided the advance notice requirement is met. However, if an employee has a serious extended illness/injury, he/she may use extended illness leave from the extended illness leave bank, if that employee has any such leave time accumulated.

Part-time and temporary employees are not eligible for Extended Illness Leave. If an employee changes employment status from full-time to part-time, they immediately forfeit any and all hours of Extended Illness Leave the employee may have.

Beginning on their first day of employment, Extended Illness Leave will accrue at the following rate:


- Regular, full-time employees will accrue Extended Illness leave at a rate of .0192 hours per each hour worked.
 - "Hour Worked", for the purposes of this policy only, is defined as: All straight-time (non-overtime) hours worked, and all approved Vacation, Personal/Sick and Extended Illness leave hours taken. Employees taking absent without pay or leave without pay or unpaid FMLA/LOA leave hours, receive no Extended Illness leave for the AWOP/LWOP/unpaid FMLA/LOA hours.

Employees are entitled to use their accrued, unused Extended Illness Leave beginning on the 1st day after they have completed twelve consecutive months of employment. Extended Illness Leave balances will roll over from year to year up to a maximum of 240 hours allowed in an employee's Extended Illness Leave bank at any given time.

Specific Requirements

The use of Extended Illness Leave is subject to the following provisions:

- a. It may be used only when the employee is medically restricted from working and has lost time for a non-work-related serious illness or a non-work related serious injury
- b. It may only be used for a period of 48 (6 scheduled workdays) consecutive scheduled work hours or more. For illness or injury lasting less than 48 consecutive scheduled work hours, personal/sick leave or vacation may be used, if available.
- c. It may be used for intermittent FMLA leave only if the initial requirements listed above are met.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 62 of 103

- d. It may be used when the employee is hospitalized for the required period of time listed above.
- e. It may be used for the employee's personal serious injury or illness only.
- f. It may be used when the employee has outpatient surgery and is restricted from work by a doctor for the required period of time as designated above.
- g. It may be used when an employee is seriously ill or injured, but not hospitalized, and cannot work for the required period of time as designated above.
- h. In all cases, a doctor must restrict the employee from work for the required period of time. Documentation from an appropriately licensed and qualified medical provider must be provided to the company within three (3) days after the onset of the serious injury or illness.
- i. In all cases, release from an appropriately licensed and qualified medical provider must be provided prior to returning to work.

5.5 FAMILY AND MEDICAL LEAVE ACT (FMLA)

The Family and Medical Leave Act (FMLA) provides eligible employees of covered employers to take unpaid, job-protected leave for specified family and medical reasons with continuation of group health insurance coverage under the same terms and conditions as if the employee had not taken leave. WPG is a covered employer with at least 50 employees within a 75-mile radius and provides FMLA.

Employees are eligible if they have:


- at least 12 months of service with the company, and
- have worked at least 1,250 hours within the preceding 12-month period.

If eligible, there are two types of leave available, including the (A) basic 12 workweeks of unpaid leave (Basic Family Leave), and the (B) military family leave (Military Family Leave) described in this policy.

A) Basic FMLA Leave

Employees who meet the eligibility requirements described above are eligible to take up to 12 workweeks of unpaid leave during any 12-month period for one of the following reasons:

1. To care for the employee's son or daughter during the first 12-months following birth; or
2. To care for a child during the first 12-months following placement with the employee for adoption or foster care; or
3. To care for a spouse, child or parent who has a serious health condition; or
4. For incapacity due to the employee's pregnancy, prenatal medical or child birth; or

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 63 of 103

5. Because of the employee's own serious health condition that renders the employee unable to perform essential functions of his or her job; or
6. for qualifying exigencies (demands) arising out of the fact that the employee's spouse, son, daughter, or parent is on covered active duty or call to covered active duty status as a member of the National Guard, Reserves, or Regular Armed Forces.

Married couples. In cases where a married couple is employed by the same company, the two spouses together may take a combined total of 12-weeks' leave during any 12-month period for reasons 1 and 2, or to care for the same individual pursuant to reason 3.


B) Military Family Leave includes two types of Military Family Leave.

1. Qualifying exigency leave. Employees meeting the eligibility requirements described above may be entitled to use up to 12 weeks of their Basic FMLA Leave for a qualifying exigency while the employee's spouse, son, daughter, or parent (the military member or member) is on covered active duty or call to covered active duty status (or has been notified of an impending call or order to covered active duty).

- **For Regular Armed Forces members**, "covered active duty or call to covered active duty status" means duty during the deployment of the member with the Armed Forces to a foreign country (outside of the United States, the District of Columbia, or any territory or possession of the United States, including international waters).
- **For a member of the Reserve components** of the Armed Forces (members of the National Guard and Reserves), "covered active duty or call to covered active duty status" means duty during the deployment of the member with the Armed Forces to a foreign country under a Federal call or order to active duty in support of a contingency operation.

Qualifying exigencies may include:

- Short-notice deployment (seven or less calendar days)
- Attending certain military events and related activities
- Childcare or school activities
- Addressing certain financial and legal arrangements
- Periods of rest and recuperation for the military member (up to 15 calendar days of leave, dependent on orders)
- Attending certain counseling sessions
- Attending post-deployment activities (available for up to 90 days after the termination of the covered military member's covered active duty status, and to address issues arising from death of military member)
- Attending to parental care needs arising from covered active duty or call to duty (arrange for alternative care for a parent of a military member, provide urgent or immediate care,

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 64 of 103

admit, or transfer to a care facility, or attend non-routine caregiver meetings with care facility staff)

- Other activities arising out of the military member's covered active duty or call to active duty and agreed upon by the company and the employee.

2. Leave to care for a covered service member. There is also a special leave entitlement that permits employees who meet the eligibility requirements for FMLA leave to take up to 26 workweeks of leave during a single 12-month period if the employee is the spouse, son, daughter, parent, or next of kin caring for a covered military service member or veteran recovering from a serious injury or illness, as defined by FMLA's regulations.

- **For a current member of the Armed Forces**, including a member of the National Guard or Reserves, the member must be undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status; or is otherwise on the temporary disability retired list, for a serious injury or illness.
- **For a covered veteran**, he or she must be undergoing medical treatment, recuperation or therapy for a serious injury or illness. *Covered veteran* means an individual who was a member of the Armed Forces (including a member of the National Guard or Reserves) and was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran. An eligible employee must begin leave to care for a covered veteran within five years of the veteran's active duty service, but the single 12-month period may extend beyond the five-year period.


Calculation of 12-Month Period

The company will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, the company will compute the amount of leave the employee has taken under this policy in the last 12 months and subtract it from the 12 weeks of available leave, and the balance remaining is the amount the employee is entitled to take at that time.

For the military caregiver leave, the company will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave taken for other FMLA circumstances during this 12-month period will be deducted from the total of 26 weeks available.

Employee Responsibilities When Requesting Family Medical Leave:

- Notify your supervisor and Human Resources Department
- Supply sufficient information for WPG to be aware that the FMLA may apply to the leave request, as well as information regarding the anticipated timing and duration of leave;
- Provide notice of the need for leave at least 30 days in advance or as soon as practicable;

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 65 of 103

- Cooperate with all requests for information regarding whether absences are FMLA-qualifying.
- Failure to comply may result in leave being delayed or denied.

Employer Responsibilities:


- When an employee requests leave, the company will inform the employee whether he or she is eligible under the FMLA. If the employee is eligible for FMLA leave, the employee will be given a written notice that includes details on any additional information he or she will be required to provide. If the employee is not eligible under the FMLA, the company will provide the employee with a written notice indicating the reason for ineligibility.
- If leave will be designated as FMLA-protected, the company will inform the employee in writing and provide information on the amount of leave that will be counted against the employee's 12- or 26-workweek entitlement.

Use of Intermittent and Reduced-Schedule Leave

- An employee does not need to use this leave entitlement in one block. Leave because of a serious health condition, or either type of family military leave may be taken intermittently (in separate blocks of time due to a single health condition) or on a reduced-schedule leave (reducing the usual number of hours worked per workweek or workday) if medically necessary.
- Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. Military Family Leave due to qualifying exigencies may also be taken on an intermittent basis. Leave may **not** be taken on an intermittent basis when used to care for the employee's own child during the first year following birth, or to care for a child placed with the employee for foster care or adoption, unless both the employer and employee agree to such intermittent leave.
- If leave is unpaid, the company will reduce the employee's salary (including FLSA exempt employees) based on the amount of time actually worked. In addition, while an employee is on an intermittent or reduced-schedule leave, the company may temporarily transfer the employee to an available alternative position that better accommodates the recurring leave and that has equivalent pay and benefits.

Medical Certification

- If the employee is requesting leave because of the employee's own or a covered relation's serious health condition, the employee and the relevant healthcare provider must supply appropriate medical certification. Employees may obtain Medical Certification forms from the Human Resources Department. When the employee requests leave, the company will notify the employee of the requirement for medical certification and when it is due (no

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 66 of 103

more than 15 days after leave is requested). If the employee provides at least 30 days' notice of medical leave, he or she should also provide the medical certification before leave begins.


- Failure to provide requested medical certification in a timely manner may result in denial of leave until it is provided. The company, at its expense, may require an examination by a second healthcare provider designated by the company, if it reasonably doubts the medical certification initially provided. If the second healthcare provider's opinion conflicts with the original medical certification, the company, at its expense, may require a third, mutually agreeable, healthcare provider to conduct an examination and provide a final and binding opinion.
- The company may require subsequent medical recertification. Failure to provide requested certification within 15 days, except in extraordinary circumstances, may result in the delay of further leave until it is provided. Employees may also be required to provide a fitness-for-duty certification upon return to work, or during intermittent leave, as required.

Fitness for Duty Certifications. Because WPG wishes to ensure the well-being of all employees, any employee returning from FMLA leave for his/her own serious health condition will need to provide a Fitness for Duty (FFD) certification signed by his/her health care provider.

- An employee who fails to provide an FFD certification will be prohibited from returning to work until it is provided. An employee who fails to provide an FFD certification may be discharged from employment.
- FFD certifications may be required when an employee returns from intermittent FMLA leave if serious concerns exist regarding the employee's ability to resume his/her duties safely.

Maintenance of Medical and other benefits. During an approved family medical leave, the company will maintain the employee's health and other benefits as if the employee continued to be actively employed. If paid leave is substituted for unpaid family medical leave, the company will deduct the employee's portion of the health plan premium as a regular payroll deduction, along with any other deductions the employee may have active. If leave is unpaid, the employee must pay his or her portion of the premium and deductions through arrangements coordinated with the Payroll department, prior to the leave being taken.

- An employee's healthcare, and any other coverages, will cease if the employee's premium payment is more than 30 days late. If the payment is more than 15 days late, the company will send the employee a letter to this effect. If the company does not receive the co-payment within 15 days after the date of that letter, the employee's coverage may cease. If the employee elects not to return to work for at least 30 calendar days at the end of the leave period, the employee will be required to reimburse the company for the cost of the premiums paid by the company for maintaining coverage during the unpaid leave, unless the employee cannot return to work because of a serious health condition or other circumstances beyond the employee's control.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 67 of 103

- If the employee elects not to return to work at the end of the leave period, the employee will be required to reimburse **the company share** for the cost of premiums paid for maintaining coverage during the leave period, except as set forth in the FMLA regulations. All other benefits cease to accrue during the unpaid portion of the leave.
- Use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of the employee's leave. Refer to individual benefit provisions for information about accrual of benefits while on FMLA.

Concurrent Leave (Substitution of paid time off for unpaid leave).

- Employees must use any accumulated sick leave, vacation time, or paid time off (PTO) to the extent provided by the benefit plan and available during FMLA leave unless such leave is covered under workers' compensation or other paid disability leave, in which case the employee may use accumulated leave time only for the purpose of satisfying any waiting period. Absences in excess of these accumulated days will be treated as FMLA leave without pay.
- The substitution of paid leave time for unpaid leave time does not extend the 12-workweek leave period. Furthermore, in no case can the substitution of paid leave time for unpaid leave time result in the receipt of more than 100 percent of an employee's salary. Family medical leave runs concurrently with other types of paid leave benefits.

Return from Leave. Upon return from leave, the employee will be restored to his/her original or an equivalent position with equivalent pay, benefits, and other employment terms in effect for all employees. An employee who fails to return at the end of FMLA leave will in most cases be considered to have voluntarily resigned his/her position with WPG.


In the event that an employee is not able to return work at the end of the 12 workweeks of protected FMLA leave, the employer is no longer required to restore the employee to an equivalent position.

Reporting While on Leave

If an employee takes leave because of the employee's own serious health condition or to care for a covered relation, the employee must contact the company according to the schedule described on the Designation Notice issued for each unique, individual FMLA event.

5.6 MATERNITY LEAVE

In accordance with the Montana Maternity Leave Act, WPG does not discriminate against any applicant or employee in hiring or in the terms, conditions and privileges of employment based upon pregnancy, childbirth, or related medical conditions.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 68 of 103

An employee requiring maternity leave shall provide WPG with reasonable notice of the expected date of leave. WPG will not terminate a female employee because of pregnancy. WPG will grant a request by a female employee for a reasonable pregnancy-related leave of absence.

WPG requires, disability as a result of pregnancy, be verified by medical certification that the employee is not able to perform employment duties. WPG will treat maternity leave the same as leave for any other disability that qualifies for benefits under the Company's disability leave plan.

Upon signifying an intent to return at the end of a pregnancy-related leave of absence, the employee will be reinstated to the employee's original job or to an equivalent position with equivalent pay and accumulated seniority as of the date leave began, retirement, fringe benefits, and other service credits unless, the employer's circumstances have so changed as to make it impossible or unreasonable to do so. Contact the Human Resource Department for questions related to your leave.

Please refer to your Summary Plan Description for information on group insurance benefits during your leave of absence. If you fail to return to work after your leave of absence, WPG may require repayment of the employer's portion of the premium.


5.7 MILITARY LEAVE

WPG will abide by all provision of the uniformed Services Employment and Re-Employment Rights Act (USERRA) and will grant military leave to all eligible employees. Employees must provide advance notice to their supervisor of their intent to take military leave and must provide appropriate documents unless giving such notice is impossible, unreasonable, or precluded by military necessity.

An employee's salary will not continue during military leave of absence. However, employees may request to use any accrued vacation or personal leave during military leave.

Please refer to your Summary Plan Description for information on group insurance benefits during your leave of absence. Any employee on military leave is does not accrue Vacation or Extended Illness time, and is not eligible for Holiday Pay.

In accordance with applicable law, employees on military leave will be reinstated upon satisfactory completion of military service and timely notice of intent to return to work, provided the employee is qualified and the company's circumstances have not changed to the extent that it would be impossible or unreasonable to provide reemployment.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 69 of 103

5.8 FUNERAL LEAVE

Paid leave will be allowed up to a maximum of three (3) working days upon the death of a member of an employee's immediate family. Immediate family members for the purpose of this leave are: mother, father, son, daughter, sister, brother, mother-in-law, father-in-law, son-in-law, daughter-in-law, husband or wife, niece, nephew, or grandchildren. Funeral leave is not available to an employee during the employee's probation period.

Employees are to discuss actual time needed with their supervisor. The supervisor's recommendation will be submitted to the HR Manager for final approval. Employees attending funerals other than for family members listed above must use vacation, personal leave, or approved unpaid leave.

5.9 JURY DUTY & WITNESS DUTY

WPG recognizes the responsibility of each individual to perform civic duties as called upon. If you are called upon to serve on a jury or to appear as a witness in a criminal prosecution or civil action, WPG will grant you the necessary time off from work for the period of service. A copy of the summons or subpoena must be shown to your supervisor on the next working day after receipt.


Regular full-time employees will receive regular straight time compensation, less any amount received for service by the court for each day of jury duty or court service. If excused from duty early, or are not required to be present in court, you are expected to be on the job.

5.10 WEDDINGS

As a wedding gift from WPG, any employee married after completion of the probationary period will be given one paid wedding holiday. This benefit is not available to an employee during the employee's probationary period. Management reserves the right to request documentation verifying that the wedding did, in fact, take place. Employees attending weddings other than their own must use vacation, personal leave, or unpaid leave.

5.11 WORKER'S COMPENSATION/ON-THE-JOB INJURY

Maintaining a safe work environment requires the continuous cooperation of all employees. WPG strongly encourages employees to communicate with fellow employees and their supervisor regarding safety issues as they arise.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 70 of 103

If an employee is injured on the job, WPG provides coverage and protection in accordance with federal and state worker's compensation laws and regulations. When an injury/illness is sustained while at work, it must be reported immediately to the employee's supervisor; who in turn will notify the Safety Specialist and/or Human Resources of the incident. The Safety Specialist or Human Resources will arrange for the initial medical appointment. Employees are encouraged to consult with the Safety Specialist prior to making any medical appointments, in particular appointments outside the workers compensation system.

Failure to report accidents is a serious matter as it may preclude an employee's coverage under Worker's Compensation Insurance.

As an additional benefit, WPG will provide each employee with 32 hours of On-The-Job-Injury paid time (OJI) per injury/illness. OJI time will be paid at an employee's regular straight time rate of pay. This paid time is not an earned benefit in the same sense as Vacation. In order to qualify for OJI time, an employee must have a documentable on-the-job injury or illness that results in lost time, AND must provide a completed Medical Status Form to the Safety Specialist and/or HR within (3) days of the injury/illness being reported. An employee may not use OJI time concurrently with any Worker's Compensation wage loss benefits they may be receiving. OJI time may be used for the following circumstances:

- a) Attending appointments regarding a work-related injury or illness (i.e. physical therapy, follow-up/initial doctor appointments, etc.)
- b) To supplement any missed wages during any waiting periods an employee may be in before they are eligible for worker's compensation benefits.


5.12 OTHER LEAVES OF ABSENCE

Under special circumstances, the company may grant unpaid personal leave of absence that are separate from and not covered by FMLA. An employee requesting a personal leave of absence must submit the request in writing to his/her supervisor, stating the reason for the leave, at least 7 days in advance. In emergency situations, written notice must be provided as soon as possible. The company has sole discretion in determining whether the leave will be granted.


Please refer to your Summary Plan Description for information on group insurance benefits during your leave of absence.

Any employee on an unpaid Personal Leave of Absence does not accrue vacation, personal leave or extended illness, and is not eligible for holiday pay.

The company will attempt to return an employee to the former position or to a similar position when the employee returns from a leave of absence. However, the company's need to fill a position may override its ability to hold a position open until an employee returns from leave. The

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 71 of 103

organization, therefore, cannot assure that it will be able to return the employee to any position after the leave of absence is over. The company retains the discretion to determine the similarity of any available position and the employee's qualifications. Failure to return from a personal leave of absence upon the expiration of the leave will be considered a voluntary resignation.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 72 of 103

SECTION 6: HEALTH CARE RELATED BENEFITS AND SERVICES

The benefits described here supersede all prior policies and procedures and may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.

6.1 HEALTH INSURANCE

WPG is currently providing optional health insurance coverage for all full-time employees and their dependents, with the waiting period for insurance implemented in accordance with the Affordable Care Act. It is the employee's responsibility to timely provide all necessary information to put and keep coverage in effect. Coverage provisions will be determined by the company, and employee contributions will be determined annually. A copy of the Health Insurance Plan Summary and information regarding employee contributions are available through the office of the HR Manager or on the company Intranet. The availability and application of the health insurance benefits are governed by the Plan document itself.


6.2 FLEXIBLE SPENDING ACCOUNT (FSA) PLAN

The WPG FSA Plan is designed to help employees defray costs of health care and childcare. The plan allows the employee to cover many of these costs by withholding funds for qualified expenses before taxes are calculated. For those full-time employees who opt not to enroll in the company health insurance plan, the company may at its discretion contribute an amount of money into a FSA Plan account for each such employee in an amount to be determined by the company in accordance with applicable law.

For all other details regarding the FSA Plan please refer to the Plan document itself which is available through the Human Resources department or on the company Intranet.

6.3 EMPLOYEE ASSISTANCE PROGRAM (EAP)


WPG provides an Employee Assistance Program (EAP) to all employees, as well as spouses and dependents. For more information regarding this benefit, please refer to the HR department or the company Intranet.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 73 of 103

6.4 EMPLOYEE PRIMARY HEALTHCARE BENEFIT

At WPG, we prioritize the health and well-being of our employees by offering a primary healthcare benefit separate from our standard medical insurance plan. This benefit is designed to make primary care more affordable and accessible, providing no-cost office visits, telehealth services, preventive screenings, reduced-cost prescription medications, and access to wellness resources.

Employees are encouraged to take advantage of these services to maintain their health and well-being. Detailed information on eligibility, participating providers, and how to access these services can be found on the company Intranet or by contacting the HR department. For further inquiries or assistance, please reach out to our HR team.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 74 of 103

SECTION 7: OTHER COMPANY BENEFITS AND SERVICES

The benefits described here supersede all prior policies and procedures and may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.

7.1 PROFIT SHARING TRUST/401(K)

WPG has established a profit-sharing plan and a 401(k) savings plan. Eligibility requirements for participation are governed by the plan summary, which can be attained through the company Intranet, the HR department or from the Controller/Financial Manager. Employees who are not classified as Employees of the Employer for the purposes of the Employer's payroll system (including, but not limited to, individuals employed by temporary help firms, technical help firms, staffing firms, professional employer organizations and other staffing firms) will be excluded from participation.


For employees who elect to participate, elected deferrals will start as soon as possible the first payroll of the following month. For more detailed assistance, employees are encouraged to contact the financial services consultant who is handling the plan.

For more information, refer to the plan summary. A plan summary will be issued after waiting period is successfully completed.

Any employee who leaves the employment of the company is advised that as to the Profit-Sharing Trust/401(k) Fund, the employee must directly contact the financial services company that is coordinating the handling of those benefits in order to make arrangements for their distribution. While every effort will be made to distribute those benefits as soon as possible, because of the paperwork and steps necessary to accomplish such changes, such distribution will not be immediate or automatic.

Management reserves the right to change these eligibility requirements at any time in accordance with applicable law.

7.2 LIFE INSURANCE

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 75 of 103

A life insurance policy is carried on all full-time employees and their dependents. A full-time employee becomes eligible six (6) months after the 1st of the month nearest the date of hire. Coverage will be determined by the company, as will employee contributions, if any. It is the employee's responsibility to make sure that a statement of beneficiary form is kept current and supplied to Human Resources.

7.3 WAGE DISABILITY INSURANCE


WPG provides long-term disability wage insurance protection for full-time employees. This is to cover partial loss of wages due to OFF THE JOB accidents or illnesses, which are not covered by worker's compensation. A full-time employee becomes eligible six (6) months after the 1st of the month nearest the date of hire. This insurance is paid monthly and the company pays the premium, with no obligation or payments from the employee. Details regarding the coverage can be obtained through Human Resources or on the company Intranet.

It is responsibility of the employee, not WPG, to initiate a disability claim under this insurance. Monthly earnings will be based on the employee's hourly rate. Bonuses and overtime payments will not be included.

7.4 USE OF COMPANY FACILITIES AND EQUIPMENT

WPG intends to provide, as a benefit to employees, the use of certain shop facilities and equipment for personal use. This use is subject to the following conditions:

- Use of more complex shop equipment will be allowed only in exceptional (and rare) situations.
- Prior to using any shop facilities for personal projects, it is necessary to obtain approval from the supervisor/supervisors of the area(s) to be used. The Production Manager is to be notified whenever an employee is using the facilities after hours. Use of facilities or equipment without prior authorization is cause for disciplinary action.
- When approval is obtained, it is not to be considered blanket approval for use of shop facilities for an entire project. The shop tools, equipment, space and block of time must be specified.
- Tools or equipment removed from the premises must be returned by the next workday. All tools and equipment must be checked by the appropriate supervisor prior to and after use.
- No work on a personal project which requires use of shop facilities will be allowed during an employee's regular shift, or at any other times when such use would disrupt the normal operation of production, the shop or equipment. Machines that are set up for a particular job must not be disturbed.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 76 of 103

- Personal project materials may not be left around any shop buildings during work hours. Smaller project materials may be kept in personal lockers or desks provided they do not interfere with any company functions.
- If personal project materials are left in other than the above-mentioned areas, the employee will be asked to remove them immediately. They will be removed on UNPAID time. If the owner cannot be identified immediately, the materials will be disposed of.
- When shop facilities are used on personal projects, the user is expected to make certain the work area and tools are clean and undamaged afterwards. The employee must replace or purchase any shop supplies used on personal projects. Tools taken out of the building must be returned in the same condition as when they left the building. Borrowers will be held responsible for any damage sustained during their use.
- Approval for use of facilities applies only to the employee who obtained the approval. Other employees, who may be helping with the project, also must obtain approval to use the facilities. **THIS APPROVAL DEFINITELY DOES NOT APPLY TO NON-EMPLOYEES. SPECIFIC APPROVAL MUST BE OBTAINED BEFORE BRINGING ANY NON-EMPLOYEE INTO ANY SHOP BUILDING.**


7.5 PERSONAL PURCHASES

1. Company Products or Items WPG Regularly Purchases

Personal purchases of raw material or stock part/items from WPG, or established vendors, will be allowed on a very limited basis. All such purchases must be pre-approved by the Purchasing Agent or Sales Manager, and must follow established WPG purchasing procedures. Since this service is provided by WPG on a non-profit basis, every effort will be made to see that the time and inconvenience to the company are minimized. All ordering or arranging for materials will be done on an "as-time-permits" basis. No special phone calls will be made in connection with personal purchases. If a personal purchase is made through a WPG vendor, once the item is received and in the employee's possession, it becomes the employee's responsibility to coordinate and handle any returns/exchanges/errors that are the fault of the employee and/or vendor.

If the item to be purchased is a "finished good" produced for sale by WPG, the employee should have sales create a sales order and make payment at the time of order. The price for these items will be our lowest published sales price, unless the employee intends to resell the item for profit. Employees caught reselling WPG product, without proper authorization, will be subject to discipline.

2. Purchase of Cut Materials or Partial Lengths

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 77 of 103

NOTE: Theft of scrap materials will be treated the same as theft of any other company property. Theft by employees may result in immediate dismissal.


Employees will be allowed to purchase scrap or partial lengths of metals or lumber for personal projects. All supervisors must sign and deliver the request to sales. All metal or lumber sales to employees will be handled on internal invoices. No scrap may be removed from company property without proper paperwork. Supervisors will monitor removal of scrap from containers in their areas.

3. 5S Items

Occasionally items or materials at WPG are deemed no longer needed or unnecessary through routine 5S audits or other Lean events. These items will go through the established "Red Tag Area Process" and will be sold or redistributed according to that established process. Any taking of items from a Red/Green/Yellow Tag area without proper approval, will be considered theft and may result in immediate termination.

7.6 EMPLOYEE ACTIVITIES

The company sponsors various activities throughout the year. Everyone is encouraged to participate in these activities as they provide employees with the opportunity to relax and enjoy the company of their co-workers outside of the work environment. Consult the HR Manager for more information.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 78 of 103

SECTION 8: EMPLOYEE COMMUNICATIONS

8.1 SOLICITATION POLICY

If employees are raising funds through the sale of raffle tickets, sponsorship for events, or purchase of products, they may place a sign or other sign-up material in the break room advertising the sale or promotion. Notices or other sign-up material may be placed in the break room only with management authorization. Any other locations require clearance from all supervisors who have employees working in that area. An employee may not directly solicit or pressure a fellow employee for money during working hours or on company property. If an employee is interested in buying a ticket or product, the discussion and purchase must be limited to non-work times such as breaks, the lunch hour or other off-work hours. Management reserves the right to remove and/or otherwise prohibit any promotions it considers inappropriate.


8.2 COMPANY NEWSLETTER

The company provides a newsletter as a forum for company information. Any employee is welcome to submit articles and notices for inclusion in the newsletter. Articles and notices that are submitted are reviewed by management for suitability. Any items that are deemed to not be in the best interests of the company will not be included.

8.3 QUESTION/SUGGESTION BOX

WPG provides a "Question/Suggestion Box" that allows employees to submit questions about any company policy, procedure, or perceived problem. The HR Manager will attempt to obtain and provide an answer to every question submitted. Answers to the questions may be provided in the newsletter following submission of the question. Depending on the question presented, signed letters may result in an individual answer directly to the writer, as well as publication. Anonymous letters will attempt to be answered, even though personal contact is not possible. Questions or other matters raised through submissions to the "Question/Suggestion Box" which are determined by management as inappropriate, or better addressed in a different fashion, will be dealt with accordingly on a case by case basis.

The box is also available to submit any suggestions with regard to the company and/or matters to be included in either company newsletter.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 79 of 103

SECTION 9: COMPLAINT RESOLUTION/GRIEVANCE PROCEDURE

Wood's Powr-Grip recognizes that there are times when the need arises for employees to express concerns or complaints in a formal manner. The following procedures will ensure that employees receive a fair and unbiased review of workplace concerns.

Employees within their probationary period are not eligible to utilize the process.

Issues Subject to Complaint Resolution/Grievance Procedure

All WPG Employees are eligible to file a complaint/grievance regarding:

- a. A claim that a specific act of management is alleged to have adversely affected the individual.
- b. A claim that a provision of the personnel policies have been violated.
- c. A claim that describes a situation that the complainant believes adversely affects the workplace environment

The Complaint Resolution/Grievance Procedure does not cover concerns regarding classification standards, benefits, salary rates or ranges.

Complaints/Grievances alleging discrimination, harassment, sexual assault or sexual harassment shall be immediately addressed by the Nondiscrimination/Anti-Harassment Policy (2.1) in the Employee Handbook.


Procedure

Step 1: Informal discussion with supervisor

Employee concerns should first be discussed with the employee's immediate supervisor. If the concern is regarding the employee's immediate supervisor, the employee should discuss the concern with the next in line in their chain-of-command. Many concerns can be resolved informally when an employee and supervisor take time to review the concern and discuss options to address the issue. Supervisors/Department Heads are encouraged to do everything possible to resolve a complain/grievance at the informal level.

The Complaint/Grievance Procedure must be initiated as per this step within 30 calendar days of the event giving rise to the grievance.

Step 2: Written complaint to supervisor

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 80 of 103

If the employee is not satisfied with the results of the informal discussion in Step 1, the employee may submit a written complaint within five working days following the informal discussion, to his or her immediate supervisor to include:

- The nature of the grievance.
- Detailed information including evidence of the issue, witnesses, related policies, etc.
- Detailed account of the informal discussion regarding the complaint/grievance, including date(s)/time(s), involved parties, etc.
- The remedy or outcome desired.

The immediate supervisor will have five working days to respond to the employee in writing.

If the employee complaint/grievance is regarding illegal harassment, discrimination or retaliation, the employee should submit the written complaint directly to the human resources (HR) department.

If the complaint/grievance is regarding the employee's immediate supervisor, the employee should submit the written complaint directly to the human resources (HR) department.

Step 3: Written complaint to executive management


If the employee is not satisfied with the response from the immediate supervisor, the employee may submit a written complaint to executive management for review. A copy should also be sent to HR. The request for review should include:

- An explanation of the grievance and details of all previous efforts to resolve the issue.
- A copy of the written complaint submitted to the immediate supervisor.
- A copy of the immediate supervisor's written response to the employee's complaint.
- Detailed information regarding the employee's dissatisfaction with the immediate supervisor's response.

Executive management will consult with the employee's immediate supervisor, HR and any other relevant parties to evaluate the grievance and provide a written response to the employee within five days. The outcome of the review by executive management will be final unless new evidence or other circumstances warrant additional review of the complaint.

Recordkeeping

HR will maintain records of the grievance process confidentially and securely.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 81 of 103


SECTION 10: DRUG AND ALCOHOL TESTING POLICY

Wood's Powr- Grip hereby adopts the following Drug and Alcohol Testing Policy ("Policy") effective January 1, 2025. This policy is intended to apply to all Wood's Powr-Grip Co. Inc. employees and management that fall within the guidelines of the Montana Workforce Drug and Alcohol Testing Act.

Definitions

The following definitions apply to this policy:

- a) "Adulterated specimen" is one that has been altered as evidenced by test results showing either a substance that is not a normal constituent for that type of specimen or showing an abnormal concentration of an endogenous substance.
- b) "Alcohol" means an intoxicating agent in alcoholic beverages, ethyl alcohol, also called ethanol, or the hydrated oxide of ethyl.
- c) "Alcohol Concentration" means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath, as indicated by an evidential breath test.
- d) "Applicable Employee" shall have the meaning set forth in Section 7 of this Policy.
- e) "Confirmation Test" for alcohol is a second test following a screening test that provides an exact measure of alcohol concentration. For controlled substances testing, a second analytical procedure performed on a different aliquot of the original specimen to identify and quantify the presence of a specific drug or metabolite.
- f) "Controlled Substance" means a dangerous drug, as defined in 49 CFR, part 40, except a drug used pursuant to a valid prescription or as authorized by law and shall, for all purposes of this Policy, include the drug commonly referred to as marijuana, regardless of whether the employee has obtained a registry identification card, or has been issued a written certification by a physician, pursuant to the Montana Medical Marijuana Act, or a similar act of any other state.
- g) "Dilute Specimen" is a specimen with creatinine and specific gravity values that are lower than expected but are still within the physiologically producible ranges of human urine.
- h) "Medical Marijuana" shall mean marijuana, when use is pursuant to the Montana Medical Marijuana Act, or a similar act of any other state.
- i) "Medical Review Officer" (MRO) means a licensed physician trained in the field of substance abuse.
- j) "Primary Specimen" in drug testing is the urine specimen bottle that is opened and tested by a first laboratory to determine whether the employee has a drug or drug metabolite in his or her system.


	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 82 of 103

- k) "Reasonable Suspicion" is reason to suspect that an employee is impaired on the job, based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, performance indicators or body odors of the employee.
- l) "Rehabilitation Program" is the program established by the Substance Abuse Professional for the employee who violates this policy or voluntarily seeks treatment for drug and/or alcohol related issues, including recommendations concerning education, treatment, follow-up testing, and aftercare.
- m) "Safety-Sensitive Function" is any on-duty work task, activity, or duty that has potential of causing significant physical or mental injury to people or damage to property. The focus is on function rather than job description. A person's job may require several different functions, some of which are not safety-sensitive.
- n) "Sample" means a urine specimen, a breath test, or oral fluid obtained in a minimally invasive manner and determined to meet the reliability and accuracy criteria accepted by laboratories for the performance of drug testing that is used to determine the presence of a controlled substance or alcohol.
- o) "Screening Test" (aka "Initial Test") in alcohol testing is an analytical procedure to determine whether an employee may have a prohibited concentration of alcohol in his or her system. In controlled substance testing, a screen to eliminate negative urine specimens from further consideration.
- p) "Split Specimen" in drug testing is the part of the urine specimen that is sent to a first laboratory and retained unopened. It is transported to a second laboratory in the event the employee requests that it be tested following a verified positive test of the primary specimen or a verified adulterated or substituted test result.
- q) "Substance Abuse Professional" (SAP) is a licensed physician (medical doctor or doctor of osteopathy), or a licensed or certified psychologist, social worker, employee assistance professional, or addiction counselor (certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission) with knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substances-related disorders. The SAP evaluates employees who have violated drug and alcohol regulations or voluntarily enrolled in drug and alcohol treatment, and makes recommendations concerning education, treatment, follow-up testing and aftercare.
- r) "Substituted Specimen" is a specimen that has been submitted in place of the donor's urine, as evidenced by creatinine and specific gravity values that are outside the physiologically producible ranges of human urine.

Policy Coordinator

The Policy Coordinator is the Manager of Human Resources. Employees will be advised if a successor Policy Coordinator is designated.

Standard of Conduct

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 83 of 103

The following standards of conduct shall apply to all employees:

- Employees are prohibited from working while impaired using legal or illegal drugs.
- The sale, possession, transfer, use or purchase of controlled substances on company property or while performing company business is strictly prohibited. Absent the mitigating circumstances set forth below, an employee testing positive for the presence of controlled substances, including Medical Marijuana, shall be deemed to be in violation of this standard of conduct, regardless of whether the use of such controlled substance occurred while at work or during non-work hours.
- The use by employees of alcohol while working, while on company premises, or while using a company vehicle or equipment, is prohibited.

Policy on Rehabilitation


Wood's Powr-Grip provides and Employee Assistance Program (EAP) to assist employees dealing with substance abuse and other problems that they or their families might encounter. The EAP provides confidential education, encouragement, and referral services and rehabilitation. For assistance through contact the Policy Coordinator.

Any employee who feels the he or she has an addiction or dependence on drugs or alcohol is encouraged to seek assistance. Requests for information concerning such assistance will be confidential. The cost of rehabilitation will be at the employee's expense. However, an employee seeking assistance for drug or alcohol dependency who has health insurance coverage should review his/her benefit booklet as he/she may be afforded coverage.

Wood's Powr-Grip will grant rehabilitation leave for up to 30 days to employees seeking treatment for an addiction or dependence on drugs or alcohol on a voluntary basis. This request must be enacted prior to any drug or alcohol test given, which may render the employee positive, and prior to the employee's notice of the requirement for testing. To request leave, employees must contact the Policy Coordinator. Leave will be without pay; however, employees may use any available Vacation, Personal/Sick, or Extended Illness time while on leave for rehabilitation if they have been employed for 12 continuous months prior to seeking the leave. Employees who have been with company for less than 12 continuous months may be entitled to the same total leave, but use of Vacation, or Personal/Sick time will not be available and the leave will be without pay.

Leave will be suspended for any employee who leaves a treatment program prior to proper discharge.

Wood's Powr-Grip must receive written notification from a Substance Abuse Professional (see definition above) that the employee has successfully completed the rehabilitation program and passed (negative result) a drug and/or alcohol test(s) to return to work. The employee will be subject to unannounced follow-up tests for twelve months following release from rehabilitation.


	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 84 of 103

If an employee is participating in a Rehabilitation program on an outpatient basis, they must first provide written approval from a Substance Abuse Professional before they can return to work in any capacity.

Sanctions for Violating Standards of Conduct or Testing Positive for Controlled Substances or Alcohol

The following sanctions shall apply to employee violating standards of conduct or for testing positive for controlled substances or alcohol.

- a) Employees who violate standards of conduct set forth above are subject to discipline up to and including immediate dismissal.
- b) Employees who test positive for controlled substances or alcohol pursuant to the procedures set forth below are subject to immediate dismissal.
- c) Prospective employees who test positive for controlled substances or alcohol will not be considered for hire for a minimum of 12 months after a positive test.
- d) Former employees who tested positive for controlled substances or alcohol will not be considered for rehire for a minimum of 12 months after a positive test.
- e) No negative sanctions will be taken by Wood's Powr-Grip if the employee or prospective employee presents a reasonable explanation or medical opinion indicating the positive test results were not caused by illegal use of controlled substances or by alcohol consumption. This explanation must be given to the Medical Review Officer (MRO) and confirmed as a reasonable explanation resulting in the rendering of the test negative. The MRO, may not, however, downgrade a positive test to negative based on the fact that the employee has obtained a registry identification card, or has been issued a written certification by a physician, pursuant to the Montana Medical Marijuana Act or a similar act of any other state.
- f) Refusal by an employee to submit to testing will be deemed a positive test and therefore subject the employee to the sanctions outlined above for a positive test. And employee has refused to take a drug test if he/she:
 - a. Fails to appear for any test within a reasonable time after being directed to do so by the employer (does not apply to pre-employment test).
 - b. Fails to remain at the testing site until the testing process is completed (does not apply for pre-employment test).
 - c. Fails to provide a urine specimen for any drug test required under this policy (does not apply for pre-employment test).
 - d. Fails to permit the observation for monitoring while providing a specimen, if applicable, or fails to follow the observer's instructions related to the collection process.
 - e. Fails to provide a sufficient amount of urine when directed, if it is determined through a required medical evaluation that there is no adequate medical explanation for the failure.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 85 of 103

- f. Fails or declines to take an additional drug test or collection as directed by the collector.
- g. Fails to undergo a medication examination or evaluation, as directed by the MRO as part of the verification process.
- h. Fails to cooperate with any part of the testing process.
- i. Possesses or wears a prosthetic or other device that could be used to interfere with the collection process.
- j. Admits to the collector or MRO that you have adulterated or substituted the specimen.
- k. Test results are verified by the MRO as adulterated or substituted.
- g) If an employee's drug test comes back diluted, the following will apply:
 - a. A positive dilute test result will be treated as a verified positive test and subject to sanctions set forth above.
 - b. For a negative test that is dilute, the Company will follow the MRO's direction, which may include another test, possibly under direct supervision, which will take place as soon as the MRO informs the Company of the diluted test results. The results of this second test will be the results on which the Company will rely. If the employee refuses to take the additional test based on the diluted result, it will be treated as a refusal to test.


Types of Testing

Wood's Powr-Grip will perform the following types of testing for controlled substances and alcohol:

1. Pre-employment testing for all employees (drug only).
 - a. Re-hires whose last day worked of most immediate previous employment was less than 6 months from the date of re-hire, will not be subject to pre-employment testing.
2. Reasonable suspicion testing of employees
3. Follow-up testing of employees who test positive.
4. Testing of employees involved in work-related accidents where there is reason to believe that the employee's act or failure to act is a direct or proximate cause of:
 - a. Death or
 - b. Physical injury or
 - c. Property damage in excess of \$1,500
5. Employees who complete a voluntary rehabilitation program and wish to return to employment.

Employees Subject to Testing

All employees are subject to testing.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 86 of 103

Controlled Substances Tested

Wood's Powr-Grip will test for the following types of controlled substances:

2) Initial test analyte	Initial test cutoff concentration	Confirmatory test analyte	Confirmatory test cutoff concentration
Marijuana metabolites	50 ng/mL	THCA ¹	15 ng/mL
Cocaine metabolites	150 ng/mL	Benzoylcegonine	100 ng/mL
Opiate metabolites Codeine/Morphine ² 6-Acetylmorphine	2000 ng/mL 10 ng/mL	Codeine Morphine 6-Acetylmorphine	2000 ng/mL 2000 ng/mL 10 ng/mL
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL
Amphetamines ³ AMP/MAMP ⁴ MDMA ⁶	500 ng/mL 500 ng/mL	Amphetamine Methamphetamine ⁵ MDMA MDA ⁷ MDEA ⁸	250 ng/mL 250 ng/mL 250 ng/mL 250 ng/mL 250 ng/mL

¹Delta-9-tetrahydrocannabinol-9-carboxylic acid (THCA)

²Morphine is the target analyte for codeine/morphine testing

³Either a single initial test kit or multiple initial test kits may be used provided the single test kit detects each target analyte independently at the specified cutoff

⁴Methamphetamine is the target analyte for amphetamine/methamphetamine testing

⁵To be reported positive for methamphetamine, a specimen must also contain amphetamine at a concentration equal to or greater than 100 ng/mL

⁶Methylenedioxymethamphetamine (MDMA)

⁷Methylenedioxyamphetamine (MDA)


⁸Methylenedioxyethylamphetamine (MDEA)

ng/mL = nanograms per milliliter

Prohibited Alcohol Concentration Level

Employees who test positive for alcohol concentration at or above 0.04 will be subject to sanctions as set forth above.

Any employee found to have an alcohol concentration of 0.02 or greater, but less than 0.04 shall not perform, nor be permitted to perform, safety sensitive functions for at least 24 hours. Safety-sensitive functions are described under the definitions section of this policy. No action will be taken against an employee based solely on tests results showing an alcohol concentration of less than 0.04, except as provided for in this statement. However, the Company having independent authority, reserves the right to take any action, deemed necessary, that is otherwise consistent with law, relating to the employee's test results showing an alcohol concentration of less than 0.04.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 87 of 103

Testing Procedures

Wood's Powr-Grip has contracted with St. Vincent Health Care and St. Vincent Occupational Health to perform most testing. The testing procedures adopted by Wood's Powr-Grip are described in the attached material. Positive tests will be reviewed by a medical review officer (MRO) prior to the imposition of sanctions against an employee. The initial test will be at the company's expense and employees will be paid at their regular rate, including benefits, for the time attributable to the testing procedure, excluding time for pre-employment drug screens.

If urine specimen is determined to be negative and diluted by the MRO, employer may require donor to undergo additional test(s) until the test result indicates a non-dilute and otherwise non-adulterated result, and the donor will be required to refrain from drinking excessive amounts of fluids prior to such subsequent test(s). The first test to indicate a non-dilute and otherwise non-adulterated result shall become the test of record.

Dispute Resolution Procedures


If an employee is tested and the employee or prospective employee disputes the result or believes that he or she has a reasonable explanation for the failed test, the employee or prospective employee will be given the opportunity to provide the medical review officer with any medial information that is relevant to interpreting the test results, including information concerning current or recently used prescription or non-prescription drugs.

The employee or prospective employee will be provided a copy of the test report. The employee or prospective employee has the right to request an additional test of the split sample by an independent laboratory selected by the person being tested. If a second test is requested, the cost of such test will be at the employee's or prospective employee's expense if the test is positive, and at the company's expense if the test is negative. If the second test is negative the results of the test shall be deemed to have been negative. The employee or prospective employee may rebut or explain the results of *any* test.

Confidentiality Requirements

All information, interviews, reports, statements, memoranda, and test results shall be confidential and shall not be disclosed to anyone, except:

- The tested employee or prospective employee.
- Wood's Powr-Grip designated Policy Coordinator
- In connection with any legal or administrative claim arising out of the implementation of sanctions, or in response to inquiries relating to a workplace accident involving death, personal injury, or property damage in excess of \$1,500 when there is reason to believe that the employee may have caused or contributed to the accident.
- Information obtained in the testing process that is unrelated to the use of controlled substances or alcohol may not be released by the MRO to the employer.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 88 of 103

Chain of Custody Requirements

The collection, transportation and confirmation testing of any urine samples will be performed in accordance with 49 CFR, part 40.

Summary of Criminal Sanctions for Use of Controlled Substances

The manufacture, distribution, possession, or use of controlled substances (other than pursuant to a valid prescription or otherwise authorize by law) is illegal under state and federal law, and is subject to various criminal sanctions, including fines of up to \$50,000 and prison sentences of up to life in prison and in some cases there are mandatory minimum prison sentences. Federal sanctions are generally more severe than are state sanctions.


Distribution of Safety Materials

Wood's Powr-Grip will make information available to all employees concerning the health and workplace safety risk of using controlled substances and alcohol. These materials will be distributed at the time each employee receives a copy of this policy and to all employees who test positive for controlled substances or alcohol. Employees wishing to receive additional copies of these materials may do so by contacting the Policy Coordinator.

EMPLOYEE BRIEFING AND INSTRUCTIONS FOR DRUG TESTING

The collection of your urine will be conducted in accordance with the DOT and Federal Highway Administration regulation. These regulations allow for individual privacy and certain precautions required to ensure specimens are not altered. The following explains the collection and reporting procedures:


1. Photo identification must be presented at the collection site.
2. You will be asked to remove any unnecessary outer garments such as a coat or jacket. Purses or briefcase will be left in an area outside of the collection site. You may retain your wallet and you may ask for a receipt for your personal belongings.
3. You will be instructed to wash and dry your hands prior to providing a sample.
4. Your sample will be provided in the privacy of a stall or otherwise partitioned area that allows for individual privacy.
5. Water facilities to sinks and toilets will be shut off for the time during supplying the sample. A bluing agent is added to the toilet bowl and sink.
6. After handing the specimen bottle to the collector, the sample should be kept in full view at all times until it is sealed and labeled.
7. If you are unable to produce an adequate amount of specimen, you will be asked to drink up to 40 of fluid, distributed reasonably through a period of up to three hours, or until the individual has provided a sufficient urine specimen, whichever occurs first. It is not a

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 89 of 103

refusal to test if the employee declines to drink. The employee will be notified of the time at which the three-hour period begins and ends. If a sample still cannot be provided, the employee will be referred to a physician for a medical evaluation. If no medical reason exists, the result is the same as a refusal to test.

8. In the event the temperature of the sample falls outside of the range allowed, you will be asked to take an oral temperature.
9. If the collection site person has reason to believe that you may have altered or substituted the sample, the collection site person will notify a higher-level supervisor and request authorization to collect a second sample under direct observation. The collection site person must be of the same gender in this instance.
10. Your sample will be labeled, and you will be asked to initial the label.
11. You will be asked to complete portions of the Custody Control Form.
12. Collection is complete when the sample is sealed and initialed and the Custody Control form is completed, and the sample is sealed in the envelope.
13. Your sample is mailed to a qualified lab for testing of drug abuse. Your sample will be tested for five drugs: Marijuana, Cocaine, Opiates, Amphetamines, and Phencyclidine (PCP).
14. Negative results should be reported within 48-72 hours.
15. Positive results require a second test called gas chromatograph/mass spectrometry, which will tell the quantity of the drug involved.
16. All test results are sent from the lab to a Medical Review Officer or a MRO. The MRO shall report whether the test is positive or negative to the Company's Policy Coordinator. Positive tests are not reported until the MRO has contacted or attempted to contact you to discuss the results. If the MRO is unable to reach you, he will contact the Company's Policy Coordinator in an effort to get you to call the MRO. The MRO may verify the test as positive without having communicated directly with you if all efforts required by state and federal law were exhausted. This must be properly documented by the MRO and the Company's Policy Coordinator if the MRO found it necessary to contact the Policy Coordinator.
17. If a positive result has been reported, you are medically disqualified from performing safety-sensitive function(s) until Wood's Powr-Grip policy procedures are satisfied.
18. The MRO only reports that a test was negative or positive. If positive, the MRO will only report the drug present. Nothing else is reported. A company official will be notified confidentially of the test results. The results may take longer if the MRO is unable to reach you (as much as 10 days).
19. All results are held in your Medical File and are confidential.
20. For the results of your test, you will be asked to sign a release allowing the Company to do so. Request must be made within 60 days on pre-employment drug testing.

WHAT ARE THE EFFECTS OF ALCOHOL AND DRUGS ON THE BODY?

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 90 of 103

ALCOHOL

Alcohol, a central nervous system depressant, is the most widely abused drug. About half of all auto accident fatalities in this country are related to alcohol abuse.

Fact: A 12-ounce can of beer, a 5-ounce glass of wine and a 1 ½ ounce shot of hard liquor all contain the same amount of alcohol, and take an average body about one hour to process and eliminate. Coffee, cold showers and exercise do no quicken sobriety.

Alcohol first acts on those parts of the brain that affect self-control and other learning behaviors. Low self-control often leads to aggressive behavior associated with some people who drink. In large doses, alcohol can dull sensation and impair muscular coordination, memory, and judgment. Taken in larger quantities over a long period of time, alcohol can damage the liver and heart and can cause permanent brain damage. On the average, heavy drinkers shorten their life span by about ten years.

Other Effects:

Greatly impaired driving ability

Reduced coordination and reflex action

Impaired vision and judgment

Inability to divide attention

Lowering of inhibitions

Overindulgence (hangover) can cause: headaches; unclear thinking; nausea; unsettled digestion; dehydration; and, aching muscles.

MARIJUANA


Marijuana is also called “grass,” “pot,” “weed,” “Mary Jane,” “Acapulco Gold,” “joint,” “roach,” “herb,” “hash,” among other street names.

Fact: While alcohol dissipates in a matter of hours, marijuana stays in the body for 28 days.

Marijuana is the most commonly abused illicit drug in the United States. The main active chemical in marijuana is THC (delta-9-tetrahydrocannabinol). Marijuana alters a person's sense of time and reduces their ability to perform tasks requiring concentration, swift reactions and coordination. The drug has a significant effect on a user's judgment, caution, and sensory/motor abilities.

Other Effects:

**Driving ability impaired for at least 4-6 hours after smoking one ‘joint’
(cigarette)**

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 91 of 103

Restlessness
Inability to concentrate
Increased chance of heart attack
Increased pulse rate and blood pressure
Rapidly changing emotions and erratic behavior
Altered sense of identity
Impaired memory
Dulling of attention
Hallucinations, fantasies and paranoia
Reduction or temporary loss of fertility

COCAINE

Cocaine is a powerfully addictive stimulant drug, which increases heart rate and blood pressure. As a power, cocaine is inhaled (snorted), ingested, or injected. It is known as “coke,” “snow,” “nose candy,” and “lady.” Cocaine is also used as free base cocaine known as “crack” or “rock,” which is smoked. It acquired its name from the popping sound heard when heated.


Fact: Many people think that because crack is smoked, it is “safer” than other forms of cocaine use. It is not. Crack cocaine is one of the most addictive substances known today. The crack “high” is reached in 4-6 seconds and lasts 15 minutes.

The most dangerous effects of cocaine are that it can cause vomiting, rapid heartbeat, tremors and convulsive movements. All of this muscle activity increased the demand for oxygen, which can result in a cocaine induced heart attack. Since the heat-regulating center in the brain is also disrupted, dangerously high body temperature can occur. With high doses, brain function, breathing and heartbeat are depressed – leading to death.

Other Effects:

“Rush” of pleasurable sensation
Heightened, but momentary, feeling of confidence, strength and endurance
Accelerated pulse, blood pressure and respiration
Impaired driving ability
Paranoia, which can trigger mental disorders in users prone to mental instability
Repeated sniffing/snorting causes irritation of the nostrils and nasal membrane
Mood swings
Anxiety
Reduced sense of humor
Compulsive behavior such as teeth grinding or repeated hand washing

AMPHETAMINES

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 92 of 103

Amphetamines are drugs that stimulate the central nervous system and promote a feeling of alertness and increases in speech and general physical activity. Some common street names for amphetamines are “speed,” “uppers,” “black beauties,” “bennies,” “wake-ups,” “footballs,” and “dexies.” Methamphetamine is a very addictive stimulant drug that activates certain systems in the brain. Although chemically related to amphetamine, the effects of methamphetamine are much more potent, longer lasting and more harmful to the central nervous system. Street methamphetamine is referred to as “speed,” “meth,” “chalk,” and when in crystal form “ice,” “crystal,” “glass,” and “tina.”

Fact: People with a history of sustained low dose use quite often become dependent and believe they need the drug to get by. These users frequently keep taking amphetamines to avoid the “down” mood they experience when the ‘high’ wears off

Even small, infrequent doses can produce toxic effects in some people. Restlessness, anxiety, mood swings, panic, heartbeat disturbances, paranoid thoughts, hallucinations, convulsions, and coma have been reported. Long-term users often have acned resembling measles, trouble with their teeth, gums and nails, and dry and dull hair. Heavy, frequent doses can produce brain damage resulting in speech disturbances.

Other Effects:


Loss of Appetite
Irritability, anxiety, apprehension
Increase heart rate and blood pressure
Difficulty focusing eyes
Exaggerated reflexes
Distorted thinking
Perspiration, headaches and dizziness
Short term insomnia

OPIATES

Opiates, including heroin, morphine, and codeine are narcotics used to relieve pain and induce sleep. Common street name are “horse,” “hard stuff,” “morfo,” “M,” “brown sugar,” Harry,” and “Mr. H.”

Fact: Heroin, also called “junk” or “smack” accounts for 90% of the narcotic abuse in this country.

Sometimes narcotics found in medicines are abused. This includes pain relievers containing opium and cough syrups containing codeine. Heroin is illegal, and cannot eve be obtained with a physicians’ prescription.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 93 of 103

Most medical problems are caused by the uncertain dosage level, use of unsterile needles, contamination of the drug, or combination of a narcotic with other drugs. These dangers depend on the specific drug, its source and the way it is used.

Other Effects:

Short lived state of euphoria
Impaired driving ability
Drowsiness followed by sleep
Constipation
Decreased physical activity
Reduced vision
Change in sleeping habits
Possible death

PCP

Phencyclidine or PCP, also called “angel dust,” “rocket fuel,” “ozone,” “wack,” “killer joints” was developed as a surgical anesthetic in the late 1950’s. Later, due to its unusual side effects in humans, it was restricted to use as a veterinary anesthetic and tranquilizer. Today it has no lawful use and is no longer legally manufactured.


Fact: PCP is a very dangerous drug. It can produce violent and bizarre behavior even in people not otherwise prone to such behavior. More people die from accidents caused by the erratic and unpredictable behavior produced by the drug than from the drug’s direct effect on the body.

PCP scrambles the brains’ internal stimuli and alters how users see and deal with their environment. Routine activities like driving and walking become difficult.

Low doses produce a rush, sometimes associated with a feeling of numbness. Increased doses produce and excited, confused state including any of the following: muscle rigidity, loss of concentration and memory, visual disturbance, delirium, feeling of isolation, and convulsions.

MDMA

MDMA (3,4-methylenedioxymethamphetamine) is a synthetic, psychoactive drug that is chemically similar to the stimulant methamphetamine and the hallucinogen mescaline. MDMA produces feelings of increased energy, euphoria, emotional warmth, and distortions in time, perception, and tactile experiences.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 94 of 103

How Is MDMA Abused?

MDMA is taken orally, usually as a capsule or tablet. It was initially popular among Caucasian adolescents and young adults in the nightclub scene or at weekend-long dance parties known as raves. More recently, the profile of the typical MDMA user has changed, with the drug now affecting a broader range of ethnic groups. MDMA is also popular among urban gay males—some report using MDMA as part of a multiple-drug experience that includes marijuana, cocaine, methamphetamine, ketamine, sildenafil (Viagra), and other legal and illegal substances.


How Does MDMA Affect the Brain?

MDMA exerts its primary effects in the brain on neurons that use the chemical (or neurotransmitter) serotonin to communicate with other neurons. The serotonin system plays an important role in regulating mood, aggression, sexual activity, sleep, and sensitivity to pain. MDMA binds to the serotonin transporter, which is responsible for removing serotonin from the synapse (or space between adjacent neurons) to terminate the signal between neurons; thus MDMA increases and prolongs the serotonin signal. MDMA also enters the serotonergic neurons via the transporter (because MDMA resembles serotonin in chemical structure) where it causes excessive release of serotonin from the neurons. MDMA has similar effects on another neurotransmitter—norepinephrine, which can cause increases in heart rate and blood pressure. MDMA also releases dopamine, but to a much lesser extent.

MDMA can produce confusion, depression, sleep problems, drug craving, and severe anxiety. These problems can occur soon after taking the drug or, sometimes, even days or weeks after taking MDMA. In addition, chronic users of MDMA perform more poorly than nonusers on certain types of cognitive or memory tasks, although some of these effects may be due to the use of other drugs in combination with MDMA. Research in animals indicates that MDMA can be harmful to the brain—one study in nonhuman primates showed that exposure to MDMA for only 4 days caused damage to serotonin nerve terminals that was still evident 6 to 7 years later.¹ Although similar neurotoxicity has not been shown definitively in humans, the wealth of animal research indicating MDMA's damaging properties strongly suggests that MDMA is not a safe drug for human consumption.

Addictive Potential

For some people, MDMA can be addictive.² A survey of young adult and adolescent MDMA users found that 43 percent of those who reported ecstasy use met the accepted diagnostic criteria for dependence, as evidenced by continued use despite knowledge of physical or psychological harm, withdrawal effects, and tolerance (or diminished response).³ These results are consistent with those from similar studies in other countries that suggest a high rate of MDMA dependence among users.⁴ MDMA abstinence-associated withdrawal symptoms include fatigue, loss of appetite, depressed feelings, and trouble concentrating.²

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 95 of 103

What Other Adverse Effects Does MDMA Have on Health?


MDMA can also be dangerous to overall health and, on rare occasions, lethal. MDMA can have many of the same physical effects as other stimulants, such as cocaine and amphetamines. These include increases in heart rate and blood pressure—which present risks of particular concern for people with circulatory problems or heart disease—and other symptoms such as muscle tension, involuntary teeth clenching, nausea, blurred vision, faintness, and chills or sweating.

In high doses, MDMA can interfere with the body's ability to regulate temperature. On rare but unpredictable occasions, this can lead to a sharp increase in body temperature (hyperthermia), which can result in liver, kidney, cardiovascular system failure, or death. MDMA can interfere with its own metabolism (breakdown within the body); therefore, potentially harmful levels can be reached by repeated MDMA administration within short periods of time. Other drugs that are chemically similar to MDMA, such as MDA (methylenedioxyamphetamine, the parent drug of MDMA) and PMA (paramethoxyamphetamine, associated with fatalities in the United States and Australia),⁵ are sometimes sold as ecstasy. These drugs can be neurotoxic or create additional health risks to the user. Furthermore, ecstasy tablets may contain other substances, such as ephedrine (a stimulant); dextromethorphan (DXM, a cough suppressant); ketamine (an anesthetic used mostly by veterinarians); caffeine; cocaine; and methamphetamine. Although the combination of MDMA with one or more of these drugs may be inherently dangerous, users who also combine these with additional substances such as marijuana and alcohol may be putting themselves at even higher risk for adverse health effects.

What Treatment Options Exist?

There are no specific treatments for MDMA abuse and addiction. The most effective treatments for drug abuse and addiction in general are cognitive-behavioral interventions that are designed to help modify the patient's thinking, expectancies, and behaviors related to their drug use and to increase skills in coping with life stressors. Drug abuse recovery support groups may also be effective in combination with behavioral interventions to support long-term, drug-free recovery.

There are currently no pharmacological treatments for addiction to MDM.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 96 of 103

SECTION 11: PRIVACY PRACTICES FOR PROTECTED HEALTH INFORMATION

This notice describes how medical information about you may be used and disclosed and how you can gain access to this information. Please review it carefully. WPG is committed to maintaining the confidentiality of your medical and financial information. This Notice of Privacy Practices informs you about how we may collect, use and disclose your personal information and your rights regarding that information.

1. What is PHI?


The term "Protected Health Information" (PHI) is individually identifiable health information, including demographic information, collected from you or created or received by a health care provider, a health plan, a health care clearinghouse, a flexible benefit plan, a Medical Reimbursement Plan (MRP) or a Health Reimbursement Arrangement (HRA) and that relates to: (i) your past, present, or future physical or mental health or condition; (ii) the health care provided to you; or (iii) the past, present, or future payment of the health care provided to you.

WPG will protect your PHI in a variety of ways. For example, we authorize access to your PHI by our employees and Business Associates only to the extent necessary to conduct our business of serving you, such as using the information needed to pay your claims. We take steps to secure our building and electronic systems from unauthorized access. We train our employees on our written confidentiality policies and procedures and employees are subject to discipline if they violate them. Our privacy policy and practices apply equally to personal information about current and former employees; we will protect the privacy of your information even if you are no longer employed by WPG.

2. Your Plan's Obligations

Your Plan refers to your Cafeteria Account and your Health Insurance Policy. Your Plan's obligations are detailed below:

- a. Your Plan is required by law to maintain the privacy of your PHI.
- b. Your Plan must provide you with a copy of this Notice regarding our legal duties and privacy practices with respect to your PHI.
- c. Your Plan must abide by the terms of this Notice.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 97 of 103

d. Your Plan reserves the right to change the provisions of the Notice and to make the new provisions effective for all PHI maintained. If we make a material change to our Notice, we will mail a revised Notice to you.

3. Your Rights


a. Inspect and Copy your PHI. You have the right to inspect and obtain a copy of your PHI held or maintained by the Plan in a designated record set for as long as the Plan maintains the PHI, with some exceptions. If the Plan cannot respond to your request within 30 days, an additional 30 days is allowed if the Plan provides you with a written statement of the reason(s) for the delay and the date by which access will be provided. You may be charged for the cost of the copies. If access is denied, you or your personal representative will be given a written denial specifying the reason(s) for denial and a description of how you may seek review of the decision, if the decision is reviewable under the HIPAA regulations.

b. Amend your PHI. You have the right to request that the Plan amend your PHI. The Plan has 60 days after the request is made to act on the request. If the Plan cannot respond to your request within 60 days, an additional 30 days is allowed if the Plan provides you with a written statement of the reason(s) for the delay and the date by which access will be provided. If the request is denied in whole or part, the Plan will provide you with a written denial that explains the basis for the denial, your right to submit a written statement disagreeing with the denial and how to file such a statement, and a description of how you can complain to the Plan or the Department of Health and Human Services. Requests for amendment should be made by submitting a written request to:

Woods Powr-Grip Co., Inc. Privacy Officer
P.O. Box 368
Laurel, MT 59044
406-628-8231

Unless otherwise notified in writing, the Privacy Officer for WPG is the Human Resource Manager.

c. Accounting of PHI Disclosures. At your request, the Plan will also provide you with an accounting of non-routine disclosures by the Plan of your PHI. Your request may be for disclosures made up to six years before the date of your request, but not for disclosures made before April 14, 2004. A request for an accounting of disclosures must be in writing. If the accounting cannot be provided within 60 days of the request, an additional 30 days is allowed if the individual is given a written statement of the reason(s) for the delay and the date by which the accounting will be provided.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 98 of 103

d. Request Restriction on PHI and Related Disclosures. You may request, in writing, that the Plan restrict the uses and disclosures of your PHI to carry out treatment, payment, or healthcare operations, or the uses and disclosures to family, relatives, or persons identified by you who are involved in your care or payment for your care. However, the Plan is not required to agree to your request. Requests for restrictions should be made in writing to:

Woods Powr-Grip Co., Inc. Privacy Officer
P.O. Box 368
Laurel, MT 59044
406-628-8231

Unless otherwise notified in writing, the Privacy Officer for WPG is the Human Resource Manager.

e. Request Confidential Communications. If you believe that a disclosure of all or part of your PHI may endanger you, you may request that we communicate with you regarding your information in an alternative manner or at an alternative location. The Plan will accommodate requests that are reasonable and that state that the disclosure of all or part of your PHI could endanger you.

4. How We May Use and Disclose Your PHI


WPG may use or disclose your personal information without your specific authorization for the purposes described below. For other purposes, we will request your specific authorization in writing, which you may grant or reject. If granted, you can revoke the authorization at any time by letting us know in writing.

a. Treatment. Treatment is the provision, coordination, or management of healthcare and related services. It also includes consultations and referrals between one or more of your healthcare providers.

b. Payment. We will use or disclose your PHI to make payments or reimbursements for services pursuant to the Plan.

c. Health Care Operations. We will use or disclose your PHI to support our business functions, such as to conduct a survey to determine whether the Plan is meeting your health care needs.

d. Business Associates. We may contract with individuals or entities (business associates) to perform various functions on our behalf or to provide certain types of services. To perform these functions, business associates will receive, create, maintain, use, or disclose PHI. We require business associates to agree in writing to contract terms designed to appropriately safeguard your information.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 99 of 103

e. Notification or Communication with Family. The Plan may disclose to a family member, legal guardian, or any other person you identify, PHI relevant to that person's involvement in your care or payment related to your care.

f. Communicating Health Care Alternatives. The Plan may contact you to provide you with information about treatment alternatives or other health-related benefits and services.

g. Services. Your name and address may be used to send you a newsletter about plan related services.

h. Other Possible Uses and Disclosures of PHI. WPG may also release PHI as required by state or federal law, regulation or order of a court with jurisdiction.

In most situations, when using or disclosing PHI or when requesting PHI from another covered entity, the Plan will make reasonable efforts not to use, disclose, or request more than the minimum amount of PHI necessary to accomplish the intended purpose of the use, disclosure, or request, taking into consideration practical and technological limitations.


Other uses and disclosures of your PHI will be made only with your written authorization, which may be revoked at any time by sending a written revocation to the Woods Powr-Grip Co., Inc. Privacy Officer, at P.O. Box 368, Laurel, MT 59044, 406-628-8231. A revocation must be signed by the participant and include the effective date of the revocation. A revocation is not effective to the extent the Plan has taken action in reliance on it or if the authorization was obtained as a condition of obtaining insurance coverage.

i. Questions or Complaints. If you have questions regarding this notice or subjects addressed, you may contact:


Woods Powr-Grip Co., Inc. Privacy Officer
P.O. Box 368
Laurel, MT 59044
406-628-8231

Unless otherwise notified in writing, the Privacy Officer for WPG is the Human Resource Manager.

If you have a complaint, you may file it in writing, addressed to the post office box address above. A complaint form is available for this purpose. You may also file a complaint with the Secretary of Health and Human Services by writing to 200 Independence Avenue, SW, Washington, D.C. 20201. This must occur within 180 days of when the problem occurred. Complaints may also be

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			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 100 of 103

addressed to the Office for Civil Rights by calling (866) 627-7748. The Plan will not retaliate against you for filing a complaint.

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 101 of 103

STANDARDS OF CONDUCT ACKNOWLEDGEMENT

I acknowledge that I have received a copy of the following Wood's Powr-Grip Co., Inc. Standards of Conduct Policies:

- **NON-DISCRIMINATION / ANTI-HARASSMENT POLICY & COMPLAINT PROCEDURE**
- **WORKPLACE THREATS AND VIOLENCE**
- **SUBSTANCE ABUSE POLICY**
- **COMPUTER ACCEPTABLE USE POLICY**
- **SOCIAL MEDIA POLICY AND GUIDELINES**


I have read and understand the Standards of Conduct and will act in accord with these policies and procedures as a condition of my employment with Wood's Powr-Grip.

I have read and understand the Standards of Conduct expected by Wood's Powr-Grip and I agree to act in accord with the Standards of Conduct as a condition of my employment by Wood's Powr-Grip.

I understand that if I have questions or concerns at any time about the Standards of Conduct, I will consult my immediate supervisor, my supervisor's manager, Human Resources, or the CEO for clarification.

Please read this handbook and these employee Standards of Conduct carefully to understand these conditions of employment before you sign this document.

Employee Printed Name	Employee Signature	Date

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 102 of 103

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

I acknowledge that I have received a copy of the Wood's Powr-Grip Co., Inc. Employee Handbook. I understand that this handbook replaces any and all prior verbal and written communications regarding Wood's Powr-Grip working conditions, policies, procedures, complaint resolution processes, and benefits.

I understand that the working conditions, policies, procedures, complaint resolution processes, and benefits described in this handbook are confidential and may not be distributed in any way nor discussed with anyone who is not an employee of Wood's Powr-Grip.

I have read and understand the content of this handbook and will act in accord with these policies and procedures as a condition of my employment with Wood's Powr-Grip.

I have read and understand the Standards of Conduct expected by Wood's Powr-Grip and I agree to act in accord with the Standards of Conduct as a condition of my employment by Wood's Powr-Grip.


I understand that if I have questions or concerns at any time about then handbook or the Standards of Conduct, I will consult my immediate supervisor, my supervisor's manager, Human Resources, or the CEO for clarification.

I also acknowledge that my probationary period, I may be terminated at any time, with or without cause and without prior notice by the Company, or I may resign for any reason. No supervisor or other representative of the Company, except the CEO, has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above. Any such agreement with the CEO must be an individual agreement in writing and signed by you and the CEO.

Finally, I understand that the contents of this employee handbook are simply policies and guidelines, not a contract or implied contract with employees. The contents of the employee handbook may change at any time.

Please read this handbook and these employee Standards of Conduct carefully to understand these conditions of employment before you sign this document.

Employee Printed Name	Employee Signature	Date

	Wood's Powr-Grip Co., Inc. Employee Handbook		Document:	Handbook
			Initial Issue Date	MAY 2012
			Revision Date:	11/01/2024
WPG EMPLOYEE HANDBOOK			Revision No.	5
			Next Revision Date:	To Be Determined
Preparation: Human Resources	Authority: CEO	Issuing Dept: Human Resources	Page:	Page 103 of 103

EMPLOYEE DRUG & ALCOHOL POLICY **ACKNOWLEDGMENT FORM**

(Employee: Please initial each paragraph and sign and date below)

____ I hereby acknowledge that I have received a copy of WPG's Drug and Alcohol Testing Policy dated January 1, 2025. I understand that WPG can, at its sole discretion, supersede, modify, revoke, suspend, or terminate the guidelines, policies, procedures, and information in this policy as circumstances or situations warrant, in whole or in part, at any time with notice to the employee and in accordance with State and Federal guidelines.

____ I understand that my position is a covered position within the provisions of the Drug and Alcohol Testing Policy.

____ I understand that I should consult with the designated Drug and Alcohol Policy Coordinator if I have any questions regarding this policy or in the materials provided.

____ I also accept responsibility for familiarizing myself with the information, seeking clarification of its terms or guidance, where necessary, and complying with the policy's content.

EMPLOYEE NAME (PRINTED) _____

EMPLOYEE Signature _____

Date _____