

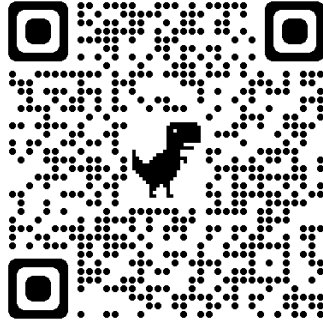


**EMPLOYMENT POLICY HANDBOOK
and
SAFETY MANUAL**

Effective 4-1-2025

POLICY CHANGES DISCLAIMER

Western Spring Mfg. reserves the right to make any changes at any time by adding to, deleting, or changing any existing policy. The current Employee Policy Handbook and Drug Policy are available online at westernspring.com/staff-portal/ or by scanning the QR code below:



The rules set out in this manual are as complete as we can reasonably make them; however, they are not necessarily all-inclusive, because circumstances that we have not anticipated may arise. Western Spring Mfg. may vary from the policies and provisions in this manual if, in its sole discretion, the circumstances require.

CONFIDENTIALITY

As the result of your employment with Western Spring Mfg., you will acquire and have access to confidential information belonging to the company of a special and unique nature and value, relating to such matters as the company's personnel and compensation information; accounts; trade secrets; procedures; manuals; financial cost and sales data-supply sources and resources; contracts; price lists; office policies and practices; existing and potential business opportunities; confidential reports; customer lists and contracts; as well as information specific to the company's products.

As a condition of employment, you must agree that all such information is the exclusive property of the company, and that you will not at any time divulge, discuss or disclose to anyone, including co-workers, except in the responsible exercise of your job, any such information, whether or not it has been designated specifically as "confidential".

Should Western Spring Mfg. obtain proof of divulgence, discussion or disclosure of any confidential information by an employee, such proof could be grounds for termination of employment.

Contents

- I. INTRODUCTION..... 1
 - IMPORTANT NOTICE 2
 - NEW EMPLOYEE INTRODUCTION 3
- II. HUMAN RESOURCES 4
 - EQUAL EMPLOYMENT OPPORTUNITY 5
 - HARASSMENT POLICY..... 6
 - DRUG AND ALCOHOL POLICY 7
 - SMOKING POLICY..... 7
 - RADIO POLICY 7
 - CELL PHONE USE POLICY 8
 - INTERNET AND COMPUTER USAGE POLICY 8
 - MOONLIGHTING POLICY 10
- III. PAYROLL..... 11
 - Attendance: 12
 - Requirements for Full Time Employment:..... 12
 - Unpaid Time Off Policy: 13
 - Timekeeping: 13
 - Shift Differentials:..... 13
 - Paid Breaks and Unpaid Lunch Period: 13
 - Pay Period and Pay Day:..... 14
 - Overtime: 14
 - Garnishments: 14
 - Personal Time Off:..... 15
 - PTO Advancements:..... 16
 - Earned Sick and Safe Time (ESST): (effective January 1, 2024) 16
 - Holidays:..... 17
 - Bereavement & Funerals: 17
 - Military Leave: 18
 - Parental Leave: 18
 - Leave of Absence: 19
 - Performance Reviews:..... 19
 - Equal Pay Policy:..... 19
- II. HUMAN RESOURCES 20
 - Health Insurance Plan: 21
 - Health Savings Account (HSA): 21
 - Dental Insurance:..... 21
 - Vision Insurance: 21
 - Life Insurance: 21
 - COBRA: 22
 - Retirement Benefits: 22
 - Tuition Reimbursement:..... 23
- V. SAFETY POLICY AND RULES 24
 - SAFETY POLICY..... 25
 - SAFETY RULES..... 25
 - FORKLIFT TRAINING 26
 - MINNESOTA EMPLOYEE RIGHT-TO-KNOW 26
 - LOCKOUT/TAGOUT POLICY 30
- VI. COMMITMENT TO QUALITY ISO 9001:2015..... 31

COMMITMENT TO QUALITY - ISO 9001:2015	32
VII. MISCELLANEOUS	34
SEVERE WEATHER	35
INCLEMENT WEATHER	35
POWER FAILURE	35
FIRE	35
EMPLOYEE ACCIDENT	36
DISASTER RECOVERY PLAN	36
ATTACHMENTS	38

I. INTRODUCTION

IMPORTANT NOTICE

The contents of this handbook are presented as a matter of information only. The plans, policies, and procedures described are not conditions of employment. Western Spring Mfg. has the right to modify, revoke, suspend, terminate, or change any or all such plans, policies, or procedures, in whole or in part, at any time with or without notice. The language in this booklet is not intended to create, nor is it to be construed to constitute, a contract between Western Spring Mfg. and any one of its employees. Employment can be terminated at any time at the will of either the employer or the employee.



NEW EMPLOYEE INTRODUCTION

Welcome aboard, we are pleased to welcome you as a new member of our company. You are now a part of a long history of Western Spring Manufacturing. As you might know, the quality of these products and services demands that each employee does his/her job correctly, promptly, and without waste. Our Quality Policy is as follows: ***Western Spring Mfg. coils and forms wire and strip material to customer specifications. Our processes are implemented by leveraging the creative and innovative skills of technicians operating state-of-the-art equipment. All procedures are aligned to ensure delivery of value to our customers and ultimately their customers. Our goal is to be the vendor of choice.***

Every job in the company is important to our overall achievement as it is to your personal success. Always remember that our business is providing high quality products with top notch service, and that our customers will continue to choose to give us their business **only** if they are satisfied with the manner in which each one of us does our work.

The management of this company is concerned about operating the business successfully. Consequently, it is important that we provide good wages, benefits, and working conditions. Employee welfare is one of our most important responsibilities: and making this a good place to work helps keep our company strong. It also means that a lot of responsibility and investment by all stakeholders is required to provide the necessary working capital for our business. This capital is used to purchase equipment, pay wages and operating expenses that are incurred before we actually collect for the work we do. It means extra special effort to keep our reputation a good one.

We expect our employees to share responsibility by taking an interest in improving their skills, being efficient in daily duties, and helping give our customers a return on their investment in services and products that we can provide. If we are proficient in our tasks, we can remain competitive, retain our reputation of quality, and strive to continue being one of the best companies in the spring and wire form industry.

The management of Western Spring Mfg. would like to stress our open invitation to you to come and speak with us at any time about any suggestions, concerns, or problems you may have.

Again, welcome, we are looking forward to working with you to achieve our common goals and helping you achieve personal and professional growth.

Sincerely,

Alex Altstatt
General Manager
Western Spring Mfg.

Western Spring Manufacturing
www.westernspring.com

Compression Springs • Extension Springs • Torsion Springs • Wire Forms • Flat Springs

II. HUMAN RESOURCES

EQUAL EMPLOYMENT OPPORTUNITY

Western Spring Mfg. complies with all applicable laws governing equal employment opportunity. This policy extends to all applicants and employees and to all aspects of the employment relationship including, but not limited to, recruiting, hiring, promotion, transfer and compensation.

Specifically, Western Spring Mfg. will provide equal employment and advancement opportunity on the basis of merit within the context of its unique business environment and without regard to race, color, creed, religion, national origin, sex, marital status with regard to public assistance, disability, sexual orientation, gender, gender identity, membership, or activity in local commission, veteran's status or age.

HARASSMENT POLICY

Western Spring Mfg. believes that every employee has the right to a work environment free of unwelcome verbal or physical conduct which harasses, disrupts, or interferes with the individual's work performance or creates an intimidating, offensive, or hostile environment. Western Spring Mfg. does not tolerate any employees engaging in this type of behavior. Any employee participating in such negative conduct will be subject to appropriate corrective action that may include termination.

EMPLOYEE HARASSMENT: Employee harassment is any unwelcome conduct that illegally discriminates against you or another employee unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment. This would include discrimination or harassment based upon an individual's age, race, color, creed, national origin, religion, gender, gender identity, genetic characteristics, physical or mental disability, or other protected classifications.

SEXUAL HARASSMENT: Sexual Harassment is defined as unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of sexual nature where submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment; or submission to or rejection of such conduct is used or threatened to be used as the basis for employment decisions affecting such individual; or such unreasonable conduct interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

REPORTING GUIDELINES: If you become aware of a situation involving unwelcome and inappropriate behavior directed toward you or another employee, report it immediately to your supervisor. If for any reason you feel that you cannot speak to your supervisor about the situation, please report it to your direct supervisor.

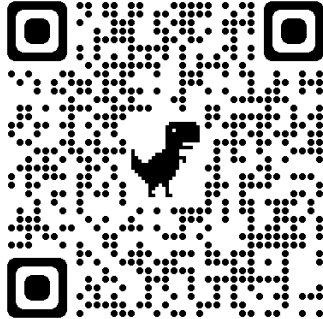
Upon receipt of a complaint under this policy, Human Resources at Western Spring Mfg. will initiate an investigation of the situation and document the responses of all individuals involved. If your complaint is not handled to your satisfaction, then you should follow up with a written statement to Western Spring Mfg.

DISCIPLINARY ACTION: Any disciplinary action taken in response to the findings of a harassment complaint will be based on the individual circumstances of each situation. Disciplinary actions may include, but are not limited to, written warnings, suspensions without pay, or termination. You will not be subject to any form of retaliation for making a complaint or otherwise assisting in an investigation. However, if it is determined that a person has falsely and intentionally accused someone of harassment, appropriate disciplinary action may be taken, which may include termination.

DRUG AND ALCOHOL POLICY

Western Spring Mfg. wants to provide each and every employee with a safe workplace. The use of drugs and alcohol in the workplace can lead to accidents and otherwise endanger our employees. Therefore, Western Spring Mfg.'s drug and alcohol program is directed towards eliminating and preventing the use of drugs and alcohol in the workplace and establishing testing for drug and alcohol use.

The Western Spring Manufacturing Drug and Alcohol Policy can be found at https://www.westernspring.com/wsm_drug_policy/, or is directly accessible by scanning the QR code below:



SMOKING POLICY

In accordance with Minn. Stat. Sections 144.411 to 144.417 “Minnesota Clean Indoor Air Act”, smoking, including e-cigarettes, is prohibited at all times within the building. Smoking will be permitted in a designated outdoor area during break time. Employees are required to properly dispose of their discarded cigarettes in receptacles, and not leave them on the ground when done. Employees that are found smoking inside a building or during work hours, other than designated break times, are subject to termination from employment at Western Spring Mfg.

RADIO POLICY

For the safety of Western Spring Mfg. employees, use of a personal listening device with headphones is allowed at workstations that do not require use of sophisticated equipment or machinery. Use of a personal listening device with headphones while walking to and from workstations is strictly prohibited. Use of a personal listening device with headphones while operating the forklift is also strictly prohibited. Use of a radio is allowed at the discretion of an employee, as long as it is not offensive or disruptive to any other employee. Please respect your co-workers with your music choices.

CELL PHONE USE POLICY

During paid work time, employees are expected to exercise the same discretion in using personal cellular phones as is expected for the use of any Western Spring Mfg. phones. Excessive personal calls (including text messaging) during the workday, regardless of phone use, can interfere with employee productivity and be distracting to others. A reasonable standard that Western Spring Mfg. encourages is to limit personal calls during work time to an average of no more than two or three short duration calls per day as needed. Employees are expected to make personal calls during non-work break time when possible and to ensure that friends and family members are aware of the Western Spring Mfg. policy. Flexibility will be provided in circumstances demanding immediate personal phone use, but this immediate need should be communicated to an employee's supervisor.

INTERNET AND COMPUTER USAGE POLICY

This Internet and Computer Usage Policy applies to all employees of Western Spring Mfg. who have access to computers and the Internet to be used in the performance of their work. Use of the Internet by employees of Western Spring Mfg. is permitted and encouraged where such use supports the goals and objectives of the business. However, access to the Internet through Western Spring Mfg. is a privilege and all employees must adhere to the policies concerning Computer, Email and Internet usage. Violation of these policies could result in disciplinary and/or legal action leading up to and including termination of employment. Employees may also be held personally liable for damage caused by any violations of this policy. All employees are required to acknowledge and confirm that they understand and agree to abide by the rules hereunder.

Computer, email and internet usage:

- Company employees are expected to use the Internet responsibly and productively. Internet access is limited to job-related activities only. Personal use will be permitted during scheduled breaks, but said use will be required to abide by appropriate access as listed below:
- Job-related activities include research and educational tasks that may be found via the Internet that would help in an employee's role.
- All Internet data that is composed, transmitted and/or received by Western Spring Mfg.'s computer systems is considered to belong to Western Spring Mfg. and is recognized as part of its official data. It is therefore subject to disclosure for legal reasons or to other appropriate third parties.
- The equipment, services and technology used to access the Internet are the property of Western Spring Mfg. and the company reserves the right to monitor Internet traffic and monitor and access data that is composed, sent or received through its online connections.
- Emails sent via the company email system should not contain content that is deemed to be offensive. This includes, though is not restricted to, the use of vulgar or harassing language/images.

- Sites and downloads may be monitored and/or blocked by Western Spring Mfg. if they are deemed to be harmful and/or not productive to business.
- The installation of software such as instant messaging technology is strictly prohibited.

Unacceptable use of the internet by employees includes, but is not limited to:

- Sending or posting discriminatory, harassing, or threatening messages or images on the Internet or via Western Spring Mfg. email service.
- Using computers to perpetrate any form of fraud, and/or software, film or music piracy.
- Stealing, using, or disclosing someone else's password without authorization.
- Downloading, copying or pirating software and electronic files that are copyrighted or without authorization.
- Sharing confidential material, trade secrets, or proprietary information outside of the organization.
- Hacking into unauthorized websites.
- Sending or posting information that is defamatory to Western Spring Mfg., its products/services, colleagues and/or customers.
- Introducing malicious software onto the company network and/or jeopardizing the security of the organization's electronic communications systems.
- Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities.
- Passing off personal views as representing those of the organization.

If an employee is unsure about what constitutes acceptable Internet usage, then he/she should ask his/her supervisor for further guidance and clarification.

All terms and conditions as stated in this Internet and Computer Usage Policy are applicable to all users of Western Spring Mfg. network and Internet connection. All terms and conditions as stated in this Internet and Computer Usage Policy reflect an agreement of all parties and should be governed and interpreted in accordance with the policies and procedures mentioned above. Any user violating these policies is subject to disciplinary actions deemed appropriate by Western Spring Mfg.

MOONLIGHTING POLICY

Moonlighting is permitted only under the following circumstances:

1. Your second job must not interfere in any way with the performance of your job duties at Western Spring Mfg. If management feels that such interference exists, you may be asked to choose between employment at Western Spring Mfg. or your second job.
2. Moonlighting with a direct competitor of Western Spring Mfg. is considered gross misconduct and is grounds for dismissal. If you are considering accepting a second job with another company in the industry, check with your supervisor to determine whether that company is a competitor or if your activities directly compete with Western Spring Mfg.

III. PAYROLL

Attendance:

Regular attendance is necessary for the accomplishment of an employee's duties. Western Spring Mfg.'s production schedule, office operations, and fellow employees are adversely affected by absenteeism and tardiness. Habitual problems for any reason can lead to the inability of Western Spring Mfg. to meet its obligations. Therefore, absenteeism and tardiness on a consistent basis can lead to termination of employment. If an employee is absent or tardy for any reason, they must call the Employee Attendance Line (651) 433-7219 or email hr@westernspring.com on the day of their absence within two (2) hours of their scheduled shift start time. Failure to call in may lead to termination of employment.

If absent one (1) or more days, employees must call **EACH** day of the absence. For absences of three or more consecutive days due to injury or illness, employees may provide a signed statement from their health care provider in lieu of calling daily. If a signed statement from a health care provider has been submitted, it must state when the employee can return to work. If it does not state when the employee can return to work, a second signed statement must be provided which clears the employee to return to work. Statements must be emailed by the health care provider to hr@westernspring.com.

While a letter or note from a health care provider is a reason for an absence, it is not considered an excused absence. Scheduled time off by using the PTO form process with approval from a supervisor will be considered an excused absence.

The following types of absences are considered excused:

- Jury Duty/Subpoena
- Military Duty
- Industrial Injury
- Holiday
- Company Business
- Parental Leave
- Personal Day

Time away from work falls into one of two categories, Scheduled and Unscheduled. Time away from work is considered Scheduled when an employee submits a PTO request form at least 12 hours in advance of their time off. Any time that is not categorized as scheduled will be considered unscheduled. See section titled "Personal Time Off" for details on submitting a PTO request form.

Requirements for Full Time Employment:

Employees must average 40 (or more) paid hours per week over a 90-day period to be considered a full-time employee and eligible for all benefits. Individuals who average less than 40 paid hours per week over a 90-day period will be classified as a part-time employee and may be subject to the following:

- PTO accrual rate will be pro-rated (reduced) based on actual hours worked during the prior 90-day period.
- Holiday Pay will be pro-rated (reduced) based on actual hours worked during the prior 90-day period.
- Employer contribution towards the healthcare premium (if enrolled) will be pro-rated (reduced) based on actual hours worked during the prior 90-day period. In order to maintain health insurance benefits, the employee will be responsible for the unsubsidized portion of the monthly health insurance premium and will be handled through payroll deduction.

- Individuals whose employment classification has been changed to part-time will be subject to a 90-day probationary period to reinstate full time employment status and the associated benefits. Individuals who average less than 36 paid hours per week over a 90-day period are subject to renegotiation of pay rate or termination of employment. Individuals who average less than 36 paid hours per week over a 90-day period are not eligible to receive health insurance benefits and will be terminated from the health insurance program and will not be eligible for reenrollment until the next open enrollment period.

Unpaid Time Off Policy:

In order to maintain a fair and equitable workplace, Western Spring Mfg. reserves the right to handle all unpaid time off, whether scheduled or unscheduled as follows:

1. All policies outlined in this Employee Policy Handbook as they pertain to paid, unpaid and holiday time off remain unchanged by this policy.
2. Payroll will be processed for actual hours worked during the pay period that unpaid time off is requested and used.
3. Scheduled, unscheduled, paid, and unpaid time off will be tracked by HR.
4. Management will review all unpaid time off at year end (June 1st for June 30th year end). The period reviewed will be June 1st – May 31st;
5. If Western Spring Mfg. is in a position to pay a year-end profit sharing, said profit share shall be prorated based on paid hours (excluding OT) during prior business year (June 1st – May 31st).
6. Leave of absence due to injuries covered by workers compensation and military service do not apply to this policy.

Timekeeping:

The federal wage-hour law requires employers to keep records of time worked by nonexempt employees. Western Spring Mfg. employees are required to “Clock In” and “Clock Out” at the beginning and end of each workday. An employee shall complete a “time adjustment slip” and place it in the container adjacent to the timeclock in circumstances where they are unable or have forgotten to clock in/out at the beginning or end of their workday. Employees who consistently fail to clock in/out and/or consistently fail to complete a time adjustment slip in these situations are subject to disciplinary actions. Instructions on how to clock in and clock out will be provided at orientation and are also posted by the timeclock station.

Shift Differentials:

Fair Labor Standards Act and Differentials

The Fair Labor Standards Act is the primary piece of federal labor law legislation, laying the foundation for most federal labor laws, including rules for overtime and minimum wage. While the FLSA strictly monitors employees’ earnings, it doesn’t require employers to provide shift differentials or premium pay for overnight, weekend or holiday shifts. *Because of this, employers are free to establish policies on shift differentials as needed, as long as they meet minimum wage and overtime law.*

Paid Breaks and Unpaid Lunch Period:

Under the Fair Labor Standards Act (FLSA), all non-exempt Western Spring Mfg. employees will be “Paid an adequate rest period within each 4 consecutive hours of work.” Western Spring Mfg. will provide at least two 10-minute paid breaks (with 2 additional minutes allowed

to walk to and from workstation, wash hands, etc.) and one 28-minute unpaid lunch break. An employee must work 4 consecutive a.m. or p.m. hours to be eligible for one or the other 10-minute paid break (i.e., if you come in late or leave early and do not work 4 consecutive hours, you are not eligible to take that respective paid break).

Employees who work more than 6 hours in a workday must take the unpaid lunch break unless they have received prior approval by their supervisor. Employees who work through their lunch break (with prior approval) must complete a time adjustment slip and place it in the container adjacent to the timeclock.

A designated break area is provided with a soda machine, refrigerators, microwaves, silverware, etc. We ask that you help keep this area clean and respect your co-workers by only consuming the food/drink that you brought in.

All Western Spring Mfg. employees are automatically clocked out and back in at their respective 28-minute lunch break, therefore Western Spring Mfg. is not liable for employees during their 28-minute lunch break on or off grounds. Leaving workstations early before breaks or end of day to heat up food, start vehicles or any other personal reason is against company policy.

Shift break bells are as follows:

6 am Start Shift		# of Chimes	# of Chimes			
9:00 am	*	9:10 am	**	PAID	10	min break
11:30 am	*	11:58 am	**	UNPAID	28	min lunch
2:00 pm	*	2:10 pm	**	PAID	10	min break
3:30 pm	***				48	Total Break minutes
7 am Start Shift		# of Chimes	# of Chimes			
10:00 am	*	10:10 am	**	PAID	10	min break
12:30 pm	*	12:58 pm	**	UNPAID	28	min lunch
3:00 pm	*	3:10 pm	**	PAID	10	min break
4:30 pm	***				48	Total Break minutes

Pay Period and Pay Day:

Payroll is processed on a bi-weekly basis at Western Spring Mfg. Direct deposit is available to all employees. Payday occurs bi-weekly on Wednesdays with direct deposit to an employee’s designated bank account(s). Paystubs are available by the end of the preceding business day via the ADP App. For individuals who have requested in advance, printed paystubs or paychecks (in lieu of direct deposit) will be available in the office by the end of the preceding business day.

Overtime:

Overtime is only for hours worked over 40 hours per week. No OT will be paid during a pay period with holiday or PTO pay unless more than 40 hours are worked, excluding any holiday or PTO hours during the same work week.

Garnishments:

Court-ordered deductions from employee pay to fulfill employee financial obligations. Garnishment procedures vary from state to state. Western Spring Mfg will follow all applicable procedures and rules surrounding wage garnishments.

Personal Time Off:

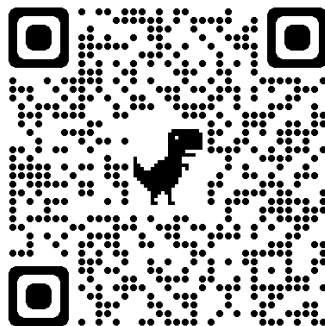
Personal Time Off is a benefit provided by Western Spring Mfg. to its employees. Eligibility to accrue PTO is contingent on the employee either working or utilizing accrued PTO for the entire bi-weekly pay period. **PTO is not earned in pay periods during which unpaid leave, earned sick leave, short or long-term disability leave, or workers' compensation leave are taken.**

Personal Time is structured as follows, after 90 days of service:

1 st and 2 nd year of service	1 week (40 hours) accrued At the rate of 1.54 hrs. per pay period.
3-5 years	2 weeks (80 hours) accrued At the rate of 3.08 hrs. per pay period.
6 years and over	3 weeks (120 hours) accrued At the rate of 4.62 hrs. per pay period.

An employee may not accrue more than 3 weeks (120 hours) of Personal Time during any calendar year and cannot carry over an accrued balance of Personal Time in excess of 130 hours. Western Spring Mfg. will buy out any accrued time of any employee over 130 hours at the end of each fiscal year (June). Regardless of circumstances the maximum Western Spring Mfg. will payout for accrued PTO is 130 Hours. **PERSONAL TIME WILL NOT BEGIN ACCRUING UNTIL A 90-DAY PROBATIONARY PERIOD HAS BEEN MET.**

All scheduled time off must be submitted on the PTO Request Form. This form is for scheduled PTO only. From your smartphone scan the QR code below to access the form. **All unscheduled time off must be called into the Employee Attendance Line.** See the previous section titled "Attendance" for details.



Supervisor approval is required for all scheduled time off. Your direct supervisor will personally contact you if the scheduled time off is **not** approved.

All time off, whether scheduled or unscheduled, must use accrued PTO or Earned Sick Time. All unpaid time off must be approved by management prior to the unpaid time off. All requested unpaid time off will be reviewed on a case-by-case basis. **Consistent requests for and use of unpaid time off may lead to disciplinary action and/or termination of employment.**

PTO Advancements:

- Only one advancement per corporate calendar year (July 1).
- PTO Advancement must be scheduled a minimum of 2 weeks prior to the requested time off and is subject to approval by management.
- Advanced PTO days are treated the same as scheduled days when it comes to bonus calculation (no penalty).
- Max advancement is 1 day per each week of annual accrual rate for a max advancement of 3 days.

Earned Sick and Safe Time (ESST): (effective January 1, 2024)

Earned Sick and Safe Time (ESST) is a state mandated benefit that is provided by Western Spring Mfg. to its employees. Eligibility to accrue ESST commences upon the start of employment for any employee who works more than 80 hours per year. Employees accrue 1-hour ESST for every 30 hours worked, up to a maximum of 48 hours accrued in a calendar year.

Earned Sick & Safe Time is not accrued when PTO, unpaid leave, short or long-term disability leave, or workers' compensation leave are taken.

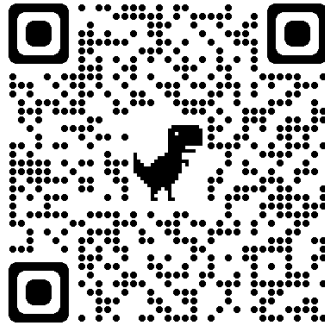
Employees can carry over unused hours from one year to the next, however the total amount of accrued and unused ESST may not exceed 80 hours at any time. Unused ESST will **not** be paid upon end of employment, regardless of circumstances.

ESST can only be utilized for qualified time away from work. Please consult the posted ESST information sheet which is available at the below QR code and posted in the lunchroom for details on what qualifies for ESST compensation.

Employees must submit a request to be compensated for time away by using accrued ESST hours. Failure to submit a request will result in the use of PTO (if available) for time away from work as defined in the previous section titled Personal Time Off.

Requests to use ESST must be submitted at least 24 hours (ideally 5 working days) prior to time off unless the time away from work stems from an unforeseen circumstance (e.g.: Emergency room visit, etc.), in which case the request must be submitted as soon as practical. Requests to use more than three (3) consecutive days of ESST will require written (supporting) documentation. Please consult HR as to what constitutes written documentation for your exact circumstance.

All ESST requests must be submitted on the Safe & Sick Time Request Form. This form is for Earned Safe and Sick Time (ESST) only. From your smartphone scan the QR code below to access the form.



Holidays:

Western Spring Mfg. will observe the following national holidays:

- New Year's Day – January 1
- Memorial Day – Last Monday of May
- Independence Day – July 4
- Labor Day – 1st Monday of September
- Thanksgiving – 4th Thursday of November
- Black Friday – Friday after Thanksgiving Day
- Christmas – December 25

Unless otherwise stated, If the Holiday falls on a Saturday or Sunday, Western Spring will observe the holiday on the nearest weekday. IE: If the holiday falls on Saturday, observance will be on Friday. If the holiday falls on Sunday, observance will be on Monday.

For each of the above-stated Holidays, full-time employees (excluding contract & temp employees) are eligible for holiday pay, up to the regular scheduled hours of work for said day of week, not to exceed 40 hours of pay in said week. If Western Spring is closed for additional business days before or after the observed holiday, accrued PTO will be utilized if available unless the employee requests in advance the days off to be unpaid. Employees with 80 hours or more of accrued PTO MUST utilize PTO for days off.

Bereavement & Funerals:

Individuals who have suffered the loss of a family member are eligible for the following paid time away from work:

- Up to two (2) days paid – Death of parent, grandparent, spouse, or child.
- Up to one (1) day paid – Death of sibling, aunt, uncle, in-law (mother, father, sister, brother), niece, or nephew.

Additional time off can be taken unpaid or with PTO (if available). Please speak with your supervisor to discuss your specific circumstances. Funerals for friends and other loved ones can be taken unpaid or with PTO (if available).

Military Leave:

Employees who are either attending reserve training camp or who are on active military duty will be granted leave without pay in accordance with applicable law. Unused vacation pay may be used if available to supplement your income during your absence. Be sure to give your supervisor as much advance notice of your training camp period as possible.

Parental Leave:

Parental leave applies to natural or adoptive parents who have been employed by Western Spring Mfg. for at least one (1) year and work an average of at least twenty (20) hours per week.

The unpaid leave shall be at a time requested by the employee, beginning not more than six (6) weeks after the birth or adoption; except in the case where the child must remain in the hospital longer than the mother. The leave may not begin more than six (6) weeks after the child leaves the hospital. The length of parental leave shall be determined by the employee but may not exceed six (6) weeks.

The six (6) week parental leave does not include the portion of time during which Personal Day time used is appropriate. Western Spring Mfg. reserves the right to require consultation between the employee's physician and a physician selected by Western Spring Mfg.

If the parental leave is longer than one (1) month, at least two (2) weeks' notice must be given prior to returning to work. Employees returning from parental leave will return to the same position unless a reduction in workforce or other layoff has eliminated their position.

If PTO is used for any portion of this leave, the employee's portion of health insurance and all other benefits will continue to be deducted from his or her paycheck during paid portion of leave. If any portion of the leave is unpaid, Western Spring Mfg. will continue to maintain the employee's benefits with employee being responsible for the full premium of each benefit during unpaid leave. Full premium payment must be made to Western Spring by the 1st of the month of each month of unpaid leave. If payment is not received, all benefits will be suspended and/or cancelled until the employee returns to full-time employment. Continuation of health insurance and/or dental insurance coverage must be arranged prior to taking the leave.

Leave of Absence:

All requests for a leave of absence will be handled on a case-by-case basis.

If PTO is used for any portion of this leave, the employee's portion of health insurance and all other benefits will continue to be deducted from his or her paycheck during paid portion of leave. If any portion of the leave is unpaid, Western Spring Mfg. will continue to maintain the employee's benefits with employee being responsible for the full premium of each benefit during unpaid leave. Full premium payment must be made to Western Spring by the 1st of the month of each month of unpaid leave. If payment is not received, all benefits will be suspended and/or cancelled until the employee returns to full-time employment. Continuation of health insurance and/or dental insurance coverage must be arranged prior to taking the leave.

Performance Reviews:

Western Spring Mfg. has developed a performance review program for the equitable evaluation and recognition of individual employee performance. Performance improvement may be suggested when management believes that an employee's performance is less than satisfactory and can be resolved through adequate counseling and training. Corrective counseling is completely at the discretion of management. Western Spring Mfg. desires to protect its investment of time and expense devoted to employee orientation and training whenever that goal is in Western Spring Mfg.'s best interest.

All employees will participate in the performance review process at intervals appropriate to the position and length of employment. Employees are encouraged to inquire about their performance from time to time, accept additional responsibilities, show initiative and review opportunities for advancement within the department or job classifications.

Supervisors are responsible for conducting individual performance reviews. They will be provided with documentation and guidelines for conducting these reviews and recognizing individual achievement. Your enthusiastic participation in the program will help to ensure its success.

Equal Pay Policy:

Western Spring Mfg. will not pay wages to any employee at a rate less than Western Spring Mfg. pays employees of the opposite sex, race or gender for comparable skills and experience. This policy is to be construed in accordance with applicable federal and state regulations.

II. HUMAN RESOURCES

Health Insurance Plan:

Western Spring Mfg. offers medical insurance coverage through Allstate Benefits. Western Spring Mfg. will contribute 50% of the monthly medical insurance premium and the other 50% of the monthly medical premium will be deducted bi-weekly through payroll deduction. The Employers' 50% contribution is for employees only (the full dependent and spousal premium(s) are the responsibility of the employee and will be deducted through payroll deduction). The employee premium portion will be determined upon several factors - employee's age and type of coverage selected (i.e., single, single plus spouse, etc.) The exact amount of the employee premium portion will be disclosed upon acceptance into the plan.

A detailed explanation of coverage will be provided upon completion and processing of the health insurance application.

Refer to your paycheck stub under the "Deductions" column listed as "Medical 1" for the bi-weekly payroll employee Health Insurance premium deduction amount. (See Employee worksheet in the "Attachments" section of this Handbook.)

Health Savings Account (HSA):

Western Spring Mfg. offers the opportunity to all employees covered under the Health Insurance Plan to make monthly contributions to a Health Savings Account (HSA) through payroll deduction. Management of the HSA is through Royal Credit Union located in White Bear Lake or Hugo, MN. Employees must set up their personal HSA account in person at either branch location. The annual maximum contributions are regulated by the federal tax code and will be provided to employees in a separate document. Western Spring Mfg. will also make a monthly contribution of \$50.00 per employee enrolled in the HSA program to the individual employee's account.

Refer to your paycheck stub under the "Deductions" column listed as "HSA CAF125 pre-tax \$" for the bi-weekly payroll employee HSA contribution deduction amount. (See Employee worksheet in the "Attachments" section of this Handbook.)

Dental Insurance:

Dental insurance is available through Companion Life Dental with employees being 100% responsible for the premium.

A detailed explanation of coverage will be provided upon completion and processing of the dental insurance application.

Vision Insurance:

Vision insurance is available through Companion Life Vision with employees being 100% responsible for the premium.

A detailed explanation of coverage will be provided upon completion and processing of the vision insurance application.

Life Insurance:

Western Spring Manufacturing offers an employer-funded group term life benefit in the amount of \$15,000.00 for all employees. There is a benefit reduction of 25% at ages 65 and 70.

COBRA:

Title X of federal law requires that most employers sponsoring health plans offer employees and their families the opportunity for a temporary extension of health coverage through COBRA. Specific employee eligibility and employer duties are outlined in the Employee Retirement Income Security Act (ERISA) of 1974.

Retirement Benefits:

Western Spring Mfg. offers all eligible employees the chance to make monthly contributions to a Savings Incentive Match Plan for Employees of Small Employers (SIMPLE) IRA through payroll deduction. Salary reduction contributions may not begin until the eligible employee completes the required paperwork provided by Western Spring Mfg. designed to permit the employee to elect the salary reduction percentage or specific dollar amount.

Contribution Limits - Western Spring Mfg. will not place any restrictions on the amount of an employee’s salary reduction contribution, except to the extent needed to comply with the annual federal tax code limit. Employees can make pre-tax contributions up to the annual maximums allowed by federal tax code through payroll deduction. Individuals over the age of 50, are eligible for higher contribution limits. Contribution limits will be provided in a sperate document.

Matching - Under the rules of the SIMPLE IRA, Western Spring Mfg. will elect to match either 1% or 3% of employee contributions for all employees. To receive the match, the employee must contribute at least the same percentage of one’s own dollars.

Borrow – You cannot borrow from the Simple Plan. You can withdraw funds but will incur a 10% penalty if before age 59 ½. Also, any dollars borrowed will be included in taxable income for the year borrowed.

Required Draw – Required minimum distribution begins at age 70 ½.

Where Monies are Invested – Numerous funds are available to select from Invesco Funds. Advice can be obtained through the account representative. See Human Resources for contact information.

Matching Examples:	A	\$30,000 salary \$ 900 if your contribution is 3% <u>\$ 900</u> Company match of 3% \$ 1,800
	B	\$60,000 Salary \$ 1,800 if your contribution is 3% <u>\$ 1,800</u> Company match of 3% \$ 3,600
	C	\$90,000 Salary \$ 2,700 if your contribution is 3% <u>\$ 2,700</u> Company match of 3% \$ 5,400

Assuming 5% Return on Investment

Example		Accumulated Dollars				
		5 Years	10 Years	15 Years	20 Years	25 Years
A	\$1,800/year	\$9,946	\$22,640	\$38,841	\$59,518	\$85,908
B	\$3,600/year	\$19,892	\$45,280	\$77,682	\$119,037	\$171,817
C	\$5,540/year	30,612	\$69,681	\$119,545	\$183,185	\$264,408

Refer to your paycheck stub under the “Deductions” column listed as “SIMPLE IRA \$” for the bi-weekly payroll employee IRA contribution deduction amount. (See Employee worksheet in the “Attachments” section of this Handbook.)

Tuition Reimbursement:

If you would like to further your education, tuition reimbursement will be handled on a case-by-case basis.

V. SAFETY POLICY AND RULES

SAFETY POLICY

Every employee of Western Spring Mfg. is responsible for safety. To achieve the Company goal of providing a safe work environment, all employees must be safety conscious. An important part of each employee's job is to do his or her job safely.

Disciplinary measures will be imposed for those employees not following the safety rules. Examples of discipline include verbal warnings, written warnings, probationary action and suspension. Serious violations may result in immediate termination.

Western Spring will provide gloves, earplugs, ventilator masks and safety glasses at no charge. Western Spring will also reimburse up to \$100.00 annually for steel toe boots.

Western Spring Mfg. will enforce all safety rules. No one is exempt from following safe work practices. Listed below are some general safety rules that each employee should follow. This list is not all-inclusive. Specific rules apply to each area, and all safety topics are covered in detail at the time of orientation.

SAFETY RULES

1. All work-related injuries and illnesses, no matter how minor, must be reported to Western Spring Mfg. management immediately.
2. All employees must learn the hazards of their job by discussing them in detail with their supervisor.
3. All new hazards must be brought to the attention of the supervisor.
4. All defective tools, equipment, machinery and/or dangerous work conditions must be brought to the attention of the supervisor. Equipment and machinery that have defective safety devices should not be used.
5. Each employee must wear all required personal protective equipment, i.e. safety glasses, safety shoes, hearing protection, etc. if applicable. Employees that are required to wear safety shoes and prescription protective eye wear will be reimbursed for the purchase of same on an as needed basis at the discretion of Western Spring Mfg. Safety glasses and hearing protection are provided by Western Spring Mfg.
6. During the heat-treating process, an employee must take all precautions to avoid injury. Welding gloves should be worn at all times when handling material or wire baskets during the heat-treating process. Welding gloves should always be worn while handling material while using the conveyor ovens.
7. Employees are encouraged to bring any suggestions concerning safety to the attention of management or their supervisor. Welding gloves should always be worn while handling material on or near the conveyor ovens.
8. Employees under the influence of drugs or alcohol will not be permitted to work and will be escorted from the premises.
9. Workers must not handle or tamper with any equipment or machinery that is not within the scope of their duties or job unless they have received instructions from their supervisor.

10. When lifting heavy objects, leg muscles should be used instead of back muscles. Each individual employee should use their own discretion when lifting any object weighing fifty (50) pounds or more. Help should be asked for and received when needed.
11. Thorough washing is necessary after handling injurious or poisonous substances, and all special instructions should be followed.
12. Employees must not attempt to operate machinery or equipment without the proper training, specific instruction and direction.
13. Operating forklifts and heavy equipment must be handled with special care where there is a possibility of overturning in dangerous areas.
14. Loose clothing, ties or jewelry are not to be worn when working on machinery.
15. Long hair (shoulder length or longer) must be tied back when working in or walking in the manufacturing area.
16. Use of headphones while operating forklifts or any other machinery or equipment is prohibited. Use of headphones while walking to and from workstations is also prohibited.
17. Removal of "Danger-Do-Not-Operate" tags or locks on any machinery by unauthorized personnel is prohibited.
18. Ladders are to be used when required. Climbing on machinery is not allowed.
19. All emergency equipment such as fire extinguishers, fire alarms and exit doors must be kept clear of all obstacles.
20. Employees must know the location of fire and safety exits and become familiar with the location of first aid equipment.
21. Good housekeeping is to be practiced by keeping workstations and offices neat and orderly.
22. No employee will be permitted on Western Spring Mfg. premises possessing firearms, ammunition or articles of a similar nature.
23. Each employee is expected to be responsible for his/her own safety and to exercise care in avoiding injury to fellow workers and others.
24. Horseplay, practical jokes and sports activities on Western Spring Mfg. premises are forbidden.
25. All tools must be maintained in good state of repair.

FORKLIFT TRAINING

All Western Spring Mfg. employees that will be operating a forklift will be required to watch a mandatory video setting forth all safety requirements associated with operating a forklift and take a written exam. Before a Western Spring Mfg. employee will be allowed to operate a forklift, they will be required to sign a policy stating they watched the video and understood all information provided in the video.

MINNESOTA EMPLOYEE RIGHT-TO-KNOW

General Policy:

The purpose of this notice is to inform you that Western Spring Mfg. is complying with the Minnesota OSHA Employee Right-to-Know standard by providing you with training about the hazardous materials, harmful physical agents and infectious agents you are

exposed to on the job. As part of this effort, we have compiled a list of the hazardous chemicals used in our facility, collected material safety data sheets (MSDSs) from our vendors for these chemicals, received reference material about the other harmful agents employees are exposed to, and ensured that containers are labeled and signs are present in the hazardous areas.

This program applies to all work operations in Western Spring Mfg. where you may be exposed to hazardous substances, harmful physical agents or infectious agents under normal working conditions or during an emergency situation.

Alex Altstatt is the program coordinator and has overall responsibility for the program. Alex Altstatt will review and update the program, as necessary.

With this program, you will be informed of the contents of the Minnesota OSHA Employee Right-to-Know standard, the hazardous properties of the chemicals you work with, safe handling procedures and measures to take to protect yourselves from these chemicals. You will also be informed of the hazards associated with non-routine tasks and the hazards associated with chemicals in unlabeled pipes.

Training:

Everyone who works with or is potentially exposed to hazardous chemicals, harmful physical agents or infectious agents will receive initial training about the Employee Right-to-Know standard and the safe use of those chemicals or agents prior to work assignment. A program has been prepared for this purpose and is outlined below. Whenever a new hazard is introduced, additional training will be provided. Training updates will be performed at least annually and may be brief summaries of information included in previous training sessions. The program coordinator is responsible for ensuring this training is provided.

Training Plan:

The employee right-to-know training will include:

- a summary of the standard and this written program;
- the chemical and physical properties of hazardous materials and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes);
- the physical hazards of chemicals (e.g., potential for fire, explosion, etc.);
- the name of the substance or agent and the level, if established, at which exposure to the hazard has been restricted according to standards adopted by the commissioner, or, if no standard has been adopted, according to guidelines established by competent professional groups;
- the health hazards, including signs and symptoms, associated with exposure to chemicals, harmful physical agents and infectious agents, and any medical condition known to be aggravated by exposure to these hazards;

- the procedures to protect against those hazards (e.g., use and maintenance of personal protective equipment; work practices or methods for proper use and handling of chemicals; and procedures for emergency response);
- the work procedures to follow to assure protection when cleaning up incidental spills and leaks of hazardous chemicals;
- the location in the facility where MSDSs, physical agent data sheets (PADSs) and infectious agents' information can be found in the 3-ring binder located outside the production floor bathrooms;
- instruction about how to read and interpret the information on labels, MSDSs and PADSs; and
- direction about how employees may obtain additional hazard information.

Records of training will be maintained for three years in personnel files and will include:

- the dates of training;
- the name, title and qualifications of the person who conducted the training;
- the names and job titles of the employees who completed the training; and
- a brief summary or outline of the information that was included in the training session.

List of Hazardous Chemicals:

Western Spring has created the list of all hazardous substances and related work practices in the facility and will update the list as necessary. The list of chemicals identifies all of the chemicals used in work areas. A separate list is available for each individual work area. Each list also identifies the corresponding MSDS for each chemical. The master list of all chemicals used by employees can be found below.

- Wire
- Cleaning Solutions
- Lubricants
- Hand Soap
- Gases
- Paint
- Grinding Wheels

List of Harmful Physical Agents *(Not Applicable)*

Alex Altstatt has created a list of the harmful physical agents that are present in the workplace in amounts approaching regulatory limits through equipment use, product handling, etc. Heat, noise, and ionizing and non-ionizing radiation sources have been

identified for each work area. Each list also identifies the corresponding physical agent data sheet for each source. The master list of all physical agents can be found below.

List of infectious agents (*Not Applicable*)

Alex Altstatt has created a list of infectious agents that workers are routinely exposed to in the course of assigned work. This includes designated first aid providers who have potential exposure to blood borne pathogens. For further information, see the written exposure control plan for the facility that meets the requirements set forth in 29 CFR 1910.1030 and that covers all infectious agents, including blood borne pathogens.

Material Safety Data Sheets (MSDS's):

MSDSs provide you with specific information about the chemicals you use. The program coordinator will maintain a binder on the shop floor with an MSDS about every substance on the list of hazardous chemicals identified in the facility. The MSDSs will contain the information found on a fully completed OSHA Form 174 or its equivalent.

The program coordinator is responsible for acquiring and updating MSDSs. He or she will contact the chemical manufacturer or vendor if additional research is necessary, or if an MSDS has not been supplied with an initial shipment. All new materials to be brought into the facility must be cleared up by the program coordinator.

Harmful Physical Agent Information (*Not Applicable*)

Infectious Agent Information (*Not Applicable*)

Labels and Other Forms of Warning:

The program coordinator will ensure all hazardous chemicals in the facility are properly labeled and updated as necessary. Manufacturer's container labels should be left on the containers if possible and must list, at a minimum, the chemical's identity, the appropriate hazard warning, and the name and address of the manufacturer, importer or other responsible party.

If you transfer chemicals from a manufacturer's container into another container, the new container must have a label that identifies the chemical identity and any appropriate hazard warning. Immediate-use containers, which are containers of hazardous substances remaining under the control of one employee *and* that are emptied during the same work shift, need not be labeled.

Pipes or piping systems do not have to be labeled, but their contents will be described in the training session.

(Not Applicable) The program coordinator will ensure equipment or work areas that specifically generate harmful physical agents at a level that may be expected to approximate or exceed the permissible exposure limit or applicable action level are posted with the name of the physical agent and the appropriate hazard warning.

(Not Applicable) The exposure control plan for the facility addresses the labeling procedures for receptacles containing potentially infectious material.

Non-Routine Tasks:

When you are required to perform hazardous non-routine tasks, a special training session will be conducted by Alex Altstatt to inform you regarding the hazardous chemicals you might be exposed to and the proper precautions to take to reduce or avoid exposure. MSDSs will be available for the hazardous chemicals used. The program coordinator is responsible for ensuring proper training is provided.

Frequency of Training:

The program coordinator will review our employee training program on a regular basis and will advise management regarding initial or annual refresher training needs. Retraining is also required whenever a new hazard is introduced into the workplace. As part of the assessment of the training program, the program coordinator will obtain input from employees regarding the training they have received and their suggestions for improving it. This review will be conducted annually; necessary revisions will be made to ensure currency and applicability.

LOCKOUT/TAGOUT POLICY

The OSHA standard for The Control of Hazardous Energy (Lockout/Tagout), Title 29 Code of Federal Regulations (CFR) Part 1910.147, addresses the practices and procedures necessary to disable machinery or equipment, thereby preventing the release of hazardous energy while employees perform servicing and maintenance activities. The standard outlines measures for controlling hazardous energies—electrical, mechanical, hydraulic, pneumatic, chemical, thermal, and other energy sources. In addition, 29 CFR 1910.333 sets forth requirements to protect employees working on electric circuits and equipment. This section requires workers to use safe work practices, including lockout and tagging procedures. These provisions apply when employees are exposed to electrical hazards while working on, near, or with conductors or systems that use electric energy.

Western Spring Mfg. will provide all employees with training on the procedures and practices of its Lockout/Tagout Policy. In addition to the training, Lockout/Tagout instructions for each individual machine will be located in a binder clearly labeled as the Lockout/Tagout instructions.

VI. COMMITMENT TO QUALITY

ISO 9001:2015

COMMITMENT TO QUALITY - ISO 9001:2015

Western Spring Mfg. is committed to providing quality parts to its customers. As part of this commitment, Western Spring Mfg. became ISO certified in July of 2014. In July of 2017, Western Spring Mfg. was upgraded and certified to the ISO 9001:2015 standard.

As part of its ISO commitment, Western Spring Mfg. will measure:

- on time delivery
- customer satisfaction
- returns

These measures are reviewed quarterly at the Management Review meeting. Also, pertinent information regarding these measures is posted daily on the digital screen in the break area.

Western Spring Mfg.'s Quality Policy is as follows:

Western Spring Mfg. coils and forms wire and strip material to customer specifications. Our processes are implemented by leveraging the creative and innovative skills of technicians operating state-of-the-art equipment. All procedures are aligned to ensure delivery of value to our customers and ultimately their customers. *Our goal is to be the vendor of choice.*

Copies of the Quality Policy are posted throughout the shop and on the digital screen in the break area.

Additional ISO requirements are as follows:

- After inspection, all routing steps must be initialed on the job traveler as “passing inspection” before moving to the next process in the production run;
- Measuring devices will be calibrated on a quarterly basis;
- All equipment will be maintained on a quarterly basis;
- Annual internal audit of:
 - Production
- Bi-annual internal audit of:
 - Contract Review;
 - Human Resources;
 - Management;
 - Purchasing;
 - Quality/Records
- Quarterly Management meetings;
- Continuous review of the following key processes:
 - Production
 - Purchasing
 - Quoting

- Continuous review of internal and external issues and interested parties:
 - Customers
 - Employees
 - Vendors
 - Competitors
 - City, County, State (OSHA)

If you have questions regarding the ISO 9001:2015 standard or regarding any of the information covered in this section, please talk to your supervisor.

VII. MISCELLANEOUS

SEVERE WEATHER

The Western Spring Mfg. office staff will monitor all potential severe weather through internet and radio. In the event the National Weather Service issues a tornado warning, all Western Spring Mfg. employees will be required to leave their workstations and calmly move to a designated location in the building until the National Weather Service tornado warning expires. The designated location in the building will be discussed at the time of employment.

INCLEMENT WEATHER

Western Spring Mfg.'s first priority in the event of inclement weather is for the safety of its employees. Western Spring Mfg. is committed to the safety and security of its employees and visitors. As such, the decision whether the office/shop should close or remain open is based on the overall concern for the safety of all employees. In general, however, Western Spring Mfg.'s practice will be to remain open and to conduct business as usual during periods of inclement weather, except as noted in this policy statement. Therefore, unless otherwise directed, all employees are expected to report to work at their regular time and to remain at work throughout the course of their regularly scheduled workday. If an employee believes she/he cannot commute safely between his/her home and place of work during periods of severe weather, the employee is required to call the Employee Attendance Line (651) 443-7219. Employees will need to use any accrued Personal Day time to cover the time off. In the event the employee does not have any accrued Personal Day time, any time off taken due to inclement weather will be taken off without pay.

POWER FAILURE

In the event of a power failure, all Western Spring Mfg. employees will be asked to calmly leave workstations until power has been restored. Once power has been restored, all Western Spring Mfg. employees will return to workstations at the direction of their supervisor. In the event power is not restored in a timely fashion, Western Spring reserves the right to send employees home. Employees will have the ability to make time up during the remainder of the work week. If time is not made up, PTO will be used to bring hours up to 40 hours.

FIRE

All fire protection equipment shall be maintained in proper operating condition. Use the appropriate extinguisher and equipment to put out all fires. A fire extinguisher map is included with this Policy Manual.

When a fire is discovered:

Announce the fire on the intercom system, giving your name and the location of the fire.

If possible, locate nearest fire extinguisher to put out the fire.

If evacuation is necessary, evacuate the building at nearest emergency exit.

Do not re-enter the building until your supervisor has authorized re-entry.

EMPLOYEE T-SHIRTS

All Western Spring Mfg. employees will receive t-shirts to wear while working. If you choose to wash and dry your t-shirts in the washer and dryer provided, this will be done off the clock during one of your breaks or lunch period.

EMPLOYEE ACCIDENT

Employee injuries resulting from an on-the-job accident are covered under Western Spring Mfg.'s workers' compensation insurance policy. **If you are injured on the job, you are required to immediately report the injury to your direct supervisor.** If treatment for injury is required, upon receiving the treatment, please provide all information regarding the medical treatment, including all facts and extent of your injury, to your direct supervisor or personnel department.

For all "nonlife-threatening injuries", Western Spring Mfg. employees should be taken to the nearest urgent care clinic of their choice:

HealthPartners North Suburban Family Physicians Urgent Care Hugo
14701 Victor Hugo Blvd. N
Hugo, MN 55038

The Urgency Room
1159 Co Rd E East
Vadnais Heights, MN 55110

North Memorial Health Urgency Center – Blaine
4181 108th Ave
Blaine, MN 55449

In the event of "serious injury", Western Spring Mfg. employees should be sent or taken to the hospital of their choice or call 911.

DISASTER RECOVERY PLAN

A disaster is defined as any unplanned event that significantly threatens the health and well-being of Western Spring Mfg.'s employees or assets, causes operational disruption, physical or environmental damage, or harm to the company's public image or reputation.

For the purpose of this plan, natural and unnatural disasters can include, but are not limited to:

- life-threatening injuries;
- non-life-threatening injuries;
- tornado, flood or storm;
- fires or explosions with damage;
- hazardous material release;
- major utility failure;
- gas leak

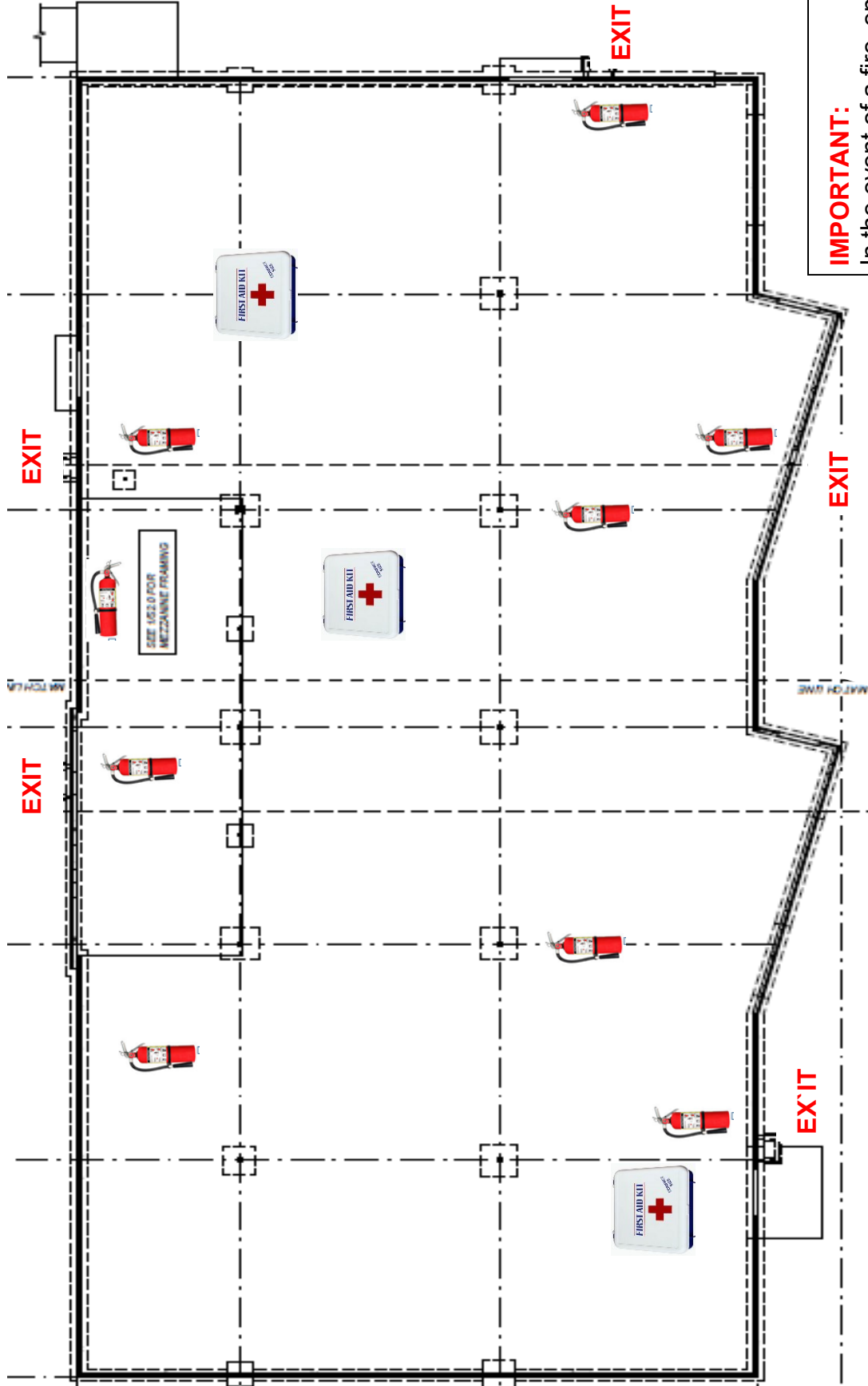
In the event of a disaster, the person discovering the disaster should promptly notify his or her direct supervisor. Based on the severity of the situation, employees may be dismissed for the remainder of the day unpaid, or PTO may be used. Any employee feeling emotionally affected by the incident and unable to perform required work duties, may take the remainder of the day off unpaid or PTO may be used. Should an employee require additional time off due to the severity of the disaster, arrangements should be made with your direct supervisor. If you choose to stay, remain at your workstation and continue your work duties. If your resources are limited due to the disaster, consult your supervisor for alternative work instructions (sweeping, cleaning, maintenance, etc.).

ATTACHMENTS



Western Spring Manufacturing

Fire Extinguisher and Exit Map



IMPORTANT:
In the event of a fire, employees are to meet at the gazebo to the north of the building.

DISCIPLINARY ACTION FORM

TO: _____

Department: -

Employee Name

- Disciplinary Action: _____ Initial Counseling *
- _____ Oral Warning
- _____ Written Warning
- _____ Written Warning and Suspension
- _____ Final Written Warning
- _____ Discharge

Your performance has been unsatisfactory for the reason(s) set forth below. Your failure to improve or avoid a recurrence will be cause for further disciplinary action in accordance with Western Spring Mfg. Policy.

Details: _____

Agreed-upon improvement plan: _____

Date of next meeting for follow-up: _____

A copy of this warning was personally delivered to the above employee by:

Supervisor

Date

I have received and read this warning notice. I have been informed that a copy of this notice will be placed in my personnel file (except in the case of initial counseling).

Employee

Date

Completion of this form for Initial Counseling shall serve as documentation only and should not be filed in the employee's personnel file unless the matter proceeds to the next step of progressive discipline.