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**TEAM HANDBOOK**

American Concrete Institute Construction Specifications Institute

Tilt- Up Concrete Association

Crea te d Jan ua ry 2014 U pda t ed S ep tem ber 2020

# General Information

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**Welcome**

Welcome to Spec Chem and related companies!

We are pleased to greet you as a new associate of the Company and to express our good wishes for your personal career success.

People are our most important asset, and it takes many capable people to operate a successful business.

We need your knowledge, abilities, enthusiasm, and determination so that Spec Chem remains a leader in the Industry.

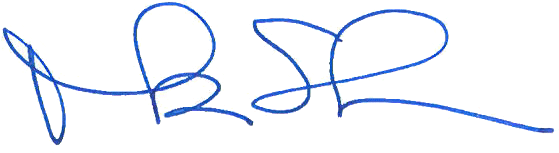
You have been selected for your job because we feel that you can make a real contribution to our operations. We hope that you immediately feel a part of our team and that you take special pride in your job knowing that you are

associated with a company which contributes to the construction accessory industry and to society as well.

Your Team Handbook has been prepared to provide information about our

personnel policies and procedures and will assist you in adapting to Spec Chem.

If you have any unanswered questions or desire additional information, feel free to contact us.



Greg Maday Mike Shull

Chairman & CEO President

### Super Service Strategy

***Mission Statement:*** *Spec Chem’ s mission is to be Number One in the industry by exceeding customer expectations.*

###### Service Basics

* 1. The Mission Statement will be known, owned, and energized by all associates.
  2. Anticipate and comply with customer needs.
  3. Spec Chem’s associates, customers and suppliers are to be treated with dignity and respect.
  4. Every Spec Chem Associate is responsible for creating a positive work environment. Practice teamwork.
  5. Be an ambassador of Spec Chem. Always talk positively.
  6. Any SpecChem Associate who receives a customer complaint “ owns” the complaint.
  7. Expedient customer satisfaction will be ensured by all. Take great measures to respond to customers’ requests as quickly as possible. Always follow up to

ensure their satisfaction.

* 1. Any and all customer complaints should be communicated to your manager. Little complaints are a Big Deal.
  2. Be knowledgeable and educated on company information ( products, services, promotions).
  3. Notify your manager immediately of hazards, injuries, equipment, or assistance needs you have.
  4. Work areas should be clean and neat. Practice good housekeeping and proper maintenance of company equipment.
  5. Protecting the assets of SpecChem is the responsibility of every Associate.
  6. Adhere to Spec Chem’ s Code of Business Ethics.

### Purpose of Associate Handbook and Its Use

Your Team Handbook has been prepared to acquaint you more fully with

Spec Chem and personnel policies that affect you and your job. There are more practices, policies, procedures, and general information that cannot be

completely covered in this handbook. If this Handbook does not supply all the information, you need to make your questions known. You will find that we are very interested in your personal progress and will respond to your questions

with knowledge and understanding.

Spec Chem does reserve the right to interpret, amend, modify, or cancel and withdraw any or all sections or provisions of the Handbook at any time. Such

action shall become effective when a copy of an announcement is provided to associates, or upon reissue of this publication.

Additionally, the language used in this Handbook is not intended to create, nor is it to be construed to constitute, a contract, nor an Employment Agreement. The contents of the Handbook are presented as a matter of information only.

While SpecChem believes wholeheartedly in the guidelines described herein, they are not conditions of employment.

# Employment with SpecChem

### Employment at Will

Nothing in this Team Handbook, or in any other personnel document, creates, or is intended to create a contract, promise or representation of continued

employment for any associate. SpecChem associates are subject to employment at will, which means that either the Company or associate can terminate

employment at any t ime, with or without notice and with or without cause. No supervisor or manager has any authority to enter into a contract of

employment - express or implied - with any individual.

### Statement of Non-Discrimination and Anti-Harassment

SpecChem strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. The environment of the

company should be characterized by mutual trust and the absence of

intimidation, oppression, and exploitation. SpecChem will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy

and by education of associates, SpecChem will seek to prevent, correct, and discipline behavior that violates this policy.

All associates, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that

prohibited conduct does not occur. Appropriate disciplinary action will be

taken against any associate who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand,

suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such

misconduct to human resources ( HR), are in violation of this policy and subject to discipline.

###### Prohibited Conduct Under This Policy

Spec Chem, in compliance with all applicable federal, state, and local anti- discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

###### Discrimination

It is a violation of SpecChem’s policy to discriminate in the provision of

employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in

employment if the basis of that discriminatory treatment is, in whole or in part, the person’s race, color, national origin, age, religion, disability

status, sex, sexual orientation, gender identity or expression, genetic information or marital status.

Discrimination of this kind may also be strictly prohibited by a variety of federal, state, and local laws, including Title VII of the Civil Rights Act of 1964, the Age Discrimination Act of 1967 and the Americans with

Disabilities Act of 1990. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

###### Harassment

Spec Chem prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy,

harassment is any verbal or physical conduct designed to threaten,

intimidate, or coerce an associate, co-worker, or any person working for or on behalf of SpecChem.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

* Verbal harassment includes comments that are offensive or

unwelcome regarding a person’ s national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability,

gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping.

* Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults,

belittles or shows hostility, aversion or disrespect toward an

individual or group because of national origin, race, color, religion,

age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status or other protected status.

###### Sexual Harassment

Sexual harassment is a form of unlawful employment discrimination under Title VII of the Civil Rights Act of 1964 and is prohibited under SpecChem’ s anti-harassment policy. According to the Equal Employment Opportunity

Commission (EEOC), sexual harassment is defined as “unwelcome sexual

advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions ... or such conduct has the

purpose or effect of ... creating an intimidating, hostile or offensive working environment.”

Sexual harassment occurs when unsolicited and unwelcome sexual

advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

* Is made explicitly or implicitly a term or condition of employment.
* Is used as a basis for an employment decision.
* Unreasonably interferes with an associate’s work performance or

creates an intimidating, hostile or otherwise offensive environment.

This definition includes many forms of offensive behavior. The following is a partial list:

* Unwanted sexual advances
* Offering of employment benefits in exchange for sexual favors
* Making or threatening reprisals after a negative response to sexual advances
* Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters
* Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or inappropriate comments about any

associate's body or dress

* Verbal sexual advances or propositions
* Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations
* Physical conduct such as touching, assault, or impeding or blocking movements; and
* Retaliation for reporting harassment or threatening to report harassment

It is unlawful for males to sexually harass females or other males, and for

females to sexually harass males or other females. Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a

manager, or harassment by persons doing business with or for SpecChem.

Spec Chem is committed to a work environment free of harassment and will

strictly enforce these guidelines. Harassing conduct will result in disciplinary action up to and including termination and/or other appropriate action. Any associate who believes that harassment has occurred should immediately

notify his/her supervisor.

Courteous, mutually respectful, pleasant, noncoercive interactions between associates that are appropriate in the workplace and acceptable to and

welcomed by both parties are not considered to be harassment, including sexual harassment.

### Accommodations for Physical or Mental Limitations ( ADA)

The Company will make reasonable accommodations for known physical or mental disabilities in accordance with applicable law unless undue hardship to the Company would result. If you require an accommodation in order to perform the essential functions of your job, you should contact human

resources and request such an accommodation. You will be asked to specify what accommodations you need and may be required to provide a

physician’ s documentation before an accommodation can be made. Each

request will be evaluated individually in accordance with applicable law. All associates are required to comply with the company’s safety standards.

Current associates who pose a direct threat to the health or safety of

themselves or other individuals in the workplace will be placed on leave until an organizational decision has been made in regard to the associate’s

immediate employment situation.

Individuals who are currently using illegal drugs are excluded from coverage under the company ADA policy.

### Open Door Philosophy

Spec Chem encourages all associates to take an "Open Door" approach to

sharing ideas, constructive feedback, and concerns. We realize that problems often stem from lack of communication, miscommunication, and

misunderstandings. You are encouraged to bring your concerns to the

attention of your manager and attempt to resolve any issues informally. You and your manager are further encouraged to interact frequently in the

interest of developing healthy l ines of mutual communication and constructive feedback.

If you are hesitant to discuss concerns with your manager, or if you are not satisfied with measures taken by your manager, you may take your concern to human resources or Company management for further assistance.

#### Employment Process and Records

We’re excited you have chosen to be a part of SpecChem. You will be glad you have joined a well-managed and growing company. If you have been

looking for a place to grow professionally and personally, you’ve chosen the right company. Here, we want you to have an outstanding work experience

and career.

###### Employment Application

We rely on the accuracy of your application and other information

presented throughout the hiring process and employment. You may be excused from the hiring process for any misrepresentations,

falsifications, or material omissions. If you have been hired, these misleading acts can result in corrective action, up to and including termination.

###### Background Check and Drug Screen

Spec Chem utilizes a thorough pre-employment background check in

coordination with other pre-employment screening options. This is done to protect the Company, our associates, and our customers by employing only the “best of the best” to work at our facilities. The Pre-Employment Background Check will include a thorough criminal background check and search of the Multi-State Sex Offender Registry. Applicants with a

criminal history are not automatically disqualified from employment, they will be reviewed on a case-by-case basis and an individual

assessment will be conducted.

Additionally, the Company requires a drug and possibly alcohol test by a facility of our selection and paid for by the Company in the following

circumstances:

* Post- offer, pre-employment drug screen
* Post-accident with or without injuries. If personal injury and/or property damage occurred, a drug and alcohol screen will follow.
* Reasonable suspicion. The Company will require a drug and/ or alcohol screen if there is a reasonable suspicion that an associate’s

judgement is impaired which could compromise, not only their own safety and performance, but also that of others.

The Company also reserves the right to conduct random drug testing as it deems appropriate during your tenure with the Company.

Failure to successfully pass the test in any of the above circumstances will disqualify an applicant from employment, or for current associates, will

result in the appropriate level of discipline, up to and including

termination. In addition, a refusal to submit to such testing will be grounds for progressive discipline measures, up to and including

termination of employment.

###### Employment Forms

As part of the new hire process, you’ll complete the following forms:

Offer Letter, Spec Chem, LLC Acknowledgement of Obligations, W-4, State Tax form, Direct Deposit, I-9 , Code of Ethics & Associate Conduct Receipt Form, Uniform policy (if applicable), Acknowledgement & Receipt of

Handbook, Cell phone reimbursement (if applicable).

###### Associate Records

Spec Chem strives to maintain the confidentiality of sensitive personnel information to the extent possible. As such, access to personnel files is

restricted to authorized associates, including management personnel, on a "need to know" basis only. Files are maintained in a secure area within our corporate office. Copies of documents within the personnel files will not be distributed to associates.

* + - Associate Examination of Personnel Files: You may view your personnel records upon request to management. However,

personnel files may not leave the personnel records area; therefore, you must schedule a time to view your file with management.

* + - Updating the Personnel File: To ensure that your personal information is up to date at all times, please notify Human

Resources of any changes including, but not limited to your name, telephone number, home address, marital status, tax information, or number of dependents.

* + - Employment Verification: All outside requests for information regarding current or former associates, including requests for references, and

verifications of employment for any reason (i.e. loans) must be directed to human resources. Other associates are not to provide employment

references for current or prior associates to avoid having a negative

impact on both the individual giving the reference and on the company.

\*\* Important to Note: *ONLY the associate’s title and dates of employment will be verified.* If the associate requesting a reference first consults

human resources or Company management to determine what

information will and will not be provided, the Company will consider providing additional information. In such an instance, the request for information must be in writing.

1. Benefits

Comprehensive Medical and Dental Insurance is available to qualified

full-time hourly and salaried associates, effective on the first day of the month following 30 days after the individual’s starting date.

Currently, the Company pays for a portion of family coverage and for a portion of single coverage of the monthly premium of both the

Comprehensive Medical and Dental Insurance for the individual associate and family. If an associate chooses to waive insurance initially and

decides to enroll at a later date, their application will be subject to the insurance company’ s approval.

Associates will be given a Group Insurance Benefits Booklet describing the benefits and coverage in detail.

1. Time Off
   1. Paid Time Off ( PTO)

We are happy to be able to provide associates with paid time off to relax and/or address personal needs that need to occur during normal business hours.

PTO provided under this policy is accrued during an associate’ s first year of employment with Spec Chem. Once an associate reaches a full year of service in the month of January, they will be awarded a lump sum shown in the table below.

|  |  |
| --- | --- |
| **Years of Service (As of January**  **1)** | **Amount** |
| 0-1 | 3.08 hours/pay period |
| 1 - 5 | 120 hours/15 days |

|  |  |
| --- | --- |
| 6 | 128 hours/16 days |
| 7 | 136 hours/17 days |
| 8 | 144 hours/18 days |
| 9 | 152 hours/19 days |
| 10+ | 160 hours/20 days |

PTO Guidelines

* + - Associates may use PTO after reaching 3 months of service.
    - Paid Time off is use i t or lose i t by December 31st. Only new hires

may carry over PTO within their first year of employment. After this,

PTO is awarded to all full-time associates with a minimum of 12 months of employment on January 1 each year.

* + - If absent from work due to associate need, available PTO must be used. Leave Without Pay (LWOP) is not an option until all available forms of paid leave have been exhausted.
    - If absence is due to lack of work (company need), then associate may choose whether to supplement their missed t ime with PTO or take

LWOP.

* + - SpecChem management reserves the right to change this benefit offering at any t ime with or without notice.
    - No pay in lieu of vacation will be made under any circumstances.
    - Any associate who voluntarily terminates, who is involuntarily

terminated or who is laid off by the Company will not be paid for any accrued/unused PTO.

* + - Associates must request PTO in writing as soon as possible prior to the desired time off.
    - Associates can use no more than 50% of their PTO balance per quarter unless otherwise approved by their Manager.

Scheduling of Paid Time Off

Associates must request PTO in writing as soon as possible prior to the desired time off.

The Company will attempt to accommodate associate PTO requests but

reserves the right to decline a request or rearrange PTO schedules at any time because of business necessity.

If two or more associates ask to schedule PTO on the same dates, requests will be granted on the basis of seniority.

Associates will receive a 4th quarter PTO reminder each year in July. All eligible associates must request PTO for the holiday season/year end by August 31. PTO will be granted on a first come, first served basis. If two associates within the same department request the same day(s), time off will be granted based on seniority. Associates can take no more than 35% of their PTO balance in December.

Any associate who voluntarily terminates, who is involuntarily terminated or who is laid off by the Company will not be paid for any accrued/unused PTO.

**\*\***Birthday Off

Following six months of service, all associates have the option of taking a free day off to celebrate their birthday. If you are unable to take your

actual birthday off, you can select a day the week of your birthday with approval from your Supervisor. These days cannot be transferred or

accumulated. Birthdays do not count against your PTO balance.

* 1. Parental Leave

Adding a new family member is a time full of change and excitement!

Family is a big part of our culture, and we recognize that during this

important life event, bonding and being together as a family is critical.

Maternity Leave

Associates who give birth to a child will receive four weeks of paid

parental leave, which will not be deducted from your available paid time

off balance. Additional time after the four weeks should be discussed with your Supervisor for scheduling and approval.

Paternity Leave

An associate who becomes a new father will receive five days of paid parental leave without affecting their vacation time allotment.

This benefit applies to new additions to your family only and is not retroactive. Parental Leave is not paid out upon separation of

employment.

Please contact a member of Human Resources within thirty ( 30) days of the birth or adoption of your child for assistance in taking advantage of this benefit as well as adding your new child to insurance.

* 1. Holidays

It is our policy to recognize certain designated days throughout the year

as paid holidays. Holiday pay is eight regular, straight-time hours for full- time associates. Under normal conditions, the Company will observe the

following holidays:

* **Memorial Day**
* **Independence Day**
* **Labor Day**
* **Thanksgiving Day**
* **Friday After Thanksgiving**
* **Christmas Day**
* **New Year’ s Day**

When one of the listed Holidays falls on a Saturday or Sunday the Holiday will be observed on the Friday prior, or in some cases, the Monday following. This is subject to change and CEO approval.

###### Holiday Eligibility

If scheduled, hourly associates must work eight hours on the first weekday preceding and eight hours on the next workday following the holiday in

order to receive holiday pay.

Regular full-time hourly and salaried associates are eligible to receive holiday pay.

Newly hired regular full-time associates are eligible to receive holiday pay upon hire.

###### Bereavement

Associates are allowed up to four consecutive days off from regularly scheduled duty with regular pay in the event of the death of the

associate's spouse, domestic partner, child, stepchild, parent, stepparent, father-in-law, mother, mother-in-law, son-in-law, daughter-in-law,

brother, sister, stepbrother, stepsister, or an adult who stood in loco parentis to the associate during childhood.

Associates are allowed one day off from regular scheduled duty with

regular pay in the event of death of the associate’ s brother-in-law, sister- in-law, aunt, uncle, grandparent, grandchild, or spouse's grandparent.

###### Jury Duty

Upon receipt of notification from the state or federal courts of an

obligation to serve on a jury or to act as a court witness, the associate should notify their supervisor. The associate is required to provide

copies of the subpoena or jury summons to their supervisor and human resources.

Spec Chem will compensate you for your service as a juror, by paying you the difference between your normal wages and the amount you

receive as a juror for a maximum of five days. In order to be paid for jury duty, you must immediately submit written evidence of the time spent on jury service to human resources upon your return to work.

Written evidence of the time periods during which you have served as a juror, signed by the Jury Commissioner, a Court Clerk, or some other

authorized person, must be provided. When you receive payment from

the Court for jury duty, please deliver the check to Human Resources for verification of payment and amount received. You will receive your jury duty pay from Spec Chem in your next regular paycheck.

Associates appearing in their own case as a plaintiff or defendant or for a non-subpoenaed court appearance will not receive paid time off.

Vacation or unpaid time should be used for such instances.

###### Voting

SpecChem believes that it is the responsibility and duty of associates to exercise the privilege of voting in elections. In accordance with this

philosophy, the company will grant associates approved time off to vote if necessary due to work schedules (up to 90 minutes).

All associates should be able to vote either before or after regularly assigned work hours. However, when this is not possible due to work schedules, managers are authorized to grant a reasonable period of

time, up to ninety minutes, during the workday to vote. This time off will be with pay. Time off for voting should be reported and coded

appropriately on timesheets.

###### Military Leave of Absence

SpecChem recognizes the responsibility of associates who are members of a military reserve organization. Such associates will be allowed

excused absences in order to fulfill their annual training obligations. Such absences will not be counted against vacation time.

A written military leave of absence request, indicating the inclusive

dates of leave, must be submitted to your supervisor as soon as you are notified of the dates of your annual obligation, and copies of the orders requiring your absence must be provided to SpecChem.

###### Illness

An absence of three (3) consecutive workdays because of i llness will require a doctor’s statement permitting return to work.

C. Associate Referral Program

Spec Chem is always looking for great people to add to our team. We value our associates and their opinion.

If an associate refers someone who is subsequently hired, and completes 90 days of employment, the associate will receive a bonus on their

paycheck for the following amounts:

* Hourly referral = **$500.00**
* Salary referral = **$1,000.00**

For an associate to qualify for the bonus, applicants must disclose the associate’s name during the interview/process on the application. ***Both associates must be in good standing for the bonus to be paid.***

1. Compensation

The Company’s pay structure and job classifications have been designed with an eye toward other successful companies. Our system provides

guidelines that attempt to promote internal equity and to reward individual performance. Your performance in your position has a

significant impact on your eligibility for merit and promotional increases.

Summarized in this section is our process for determining initial hiring salaries and the Company’s approach to determining and administering salary increases.

Your total compensation at SpecChem consists not only of the salary or

wages you are paid, but also various associate and dependent benefits as described in the “benefits” section of this Associate Handbook. Our

Company’s philosophy is to provide a total compensation package (compensation and benefits) that is competitive with successful

companies in our line of business and in our geographic area.

Compensation increases are based on merit, individual performance, and the company’s overall performance. Compensation reviews are

completed by the associate’s manager and approved by the next level manager.

###### Employment Classifications

**Full Time.** This individual regularly designated to work SpecChem’s full- time schedule of 30 hours or more and not on temporary status.

Generally, you are eligible for Spec Chem’ s benefit package subject to the terms, conditions, and limitations of each program.

**Part Time.** This is an individual regularly scheduled to work less than 30 hours on a temporary status. While part- time associates receive all

legally mandated benefits (i .e. Social Security and Workers’

Compensation insurance), you are inelibible for Spec Chem’ s other benefit programs.

**Non-Exempt or Exempt.** This is based on the nature of the job and decided according to federal and state wage and hour laws.

* Non-Exempt: Eligible to be paid overtime
* Exempt: Not eligible for overtime pay

###### Non-Exempt Hourly Reporting

**Hours Worked.** It is Spec Chem’s intent to compensate associates for all hours worked. Hours worked is all time an associate “ is scheduled to

work.” Hours worked must be recorded on the associate’ s time sheet to accurately reflect total hours worked each workday.

**Overtime.** Hourly associates will receive overtime compensation at 1½ times their regular hourly rate for any authorized work in excess of 40 hours in one work week. Federal law states that overtime work must be accounted for in the week it is actually performed. **Overtime must be assigned and approved by your manager and verified.** To be

compensated, overtime is rounded to the nearest quarter hour. Only time actually worked is counted in determining eligibility for overtime compensation. Unpaid meal breaks are not counted as hours worked,

nor are hours paid for PTO, holidays, jury duty, and other forms of paid leave.

An associate may be asked to work overtime on their day off. When this situation arises, the associate will be expected to perform overtime

work, providing adequate notice is given to the associate.

**Break Time.** The purpose of break periods is to provide associates with a short respite from normal work activities. Break periods are

considered time worked. While break periods are usually scheduled in the middle of each four (4) hours worked, supervisors may schedule

break periods at some other time to reflect business operational needs.

**Lunch Time.** A meal period is provided to associates scheduled to work eight (8 ) hours or more in a day. Meal periods are not considered hours worked and therefore are not paid as long as the associate does not

work during the meal period. Although associates will be paid for all time worked, working during the meal period requires prior approval from your supervisor.

###### Salary Reviews and Administration

The Company supports a compensation philosophy that is competitive in our industry and which is commensurate with the responsibility of your position, your knowledge, skills and experience, and the

performance/ results achieved. The company applies these

considerations to all our associates and strives to be consistent in its salary administration practices throughout the organization.

In making salary adjustments, consideration is given to your overall job performance as well as the industry salary standard of your position.

Salary increases are based on merit. Consequently, salary increases, if given, are granted only where performance and results justify such

action.

Promotional increases are made based on the individual’ s qualifications, current salary, and sales results (where applicable). Promotions may

result in movement from one job level to another.

###### Hidden Benefits for All Associates

There are hidden financial benefits that serve as part of your total compensation package. In addition to your hourly/salary rate,

Spec Chem pays the employer’s share of Federal income tax. Workman’s compensation insurance, State/Federal unemployment insurance and

Group Health/Dental/Life insurance.

# Associate Relations and Expectations

#### Business Hours

Normal business hours for the corporate office are 8:00 am to 5:00pm Monday through Friday with a one-hour lunch break unless otherwise

specified. Regular working hours at our plant locations vary by location and position. Your manager will establish and inform you of your working

hours.

#### Attendance and Job Abandonment

Regular and consistent attendance is vital to SpecChem’s success and a requirement of all Associates. The company’s Associates rely on one

another to meet project and program schedules and deliverables. To ensure that we continue to function efficiently and competitively, unscheduled

absences from work should occur only in uncontrollable circumstances such as illness or emergency.

Absenteeism, early departures from work, and late arrivals burden your

fellow co-workers and the Company. If you cannot avoid being late to work or are unable to work as scheduled***, you must contact your manager via***

***phone call as soon as possible***. An absence is defined as any absence from work during scheduled working hours ( including overtime), excluding

absence for work-incurred injuries, scheduled vacation, or time off allowed by federal or state law.

Every time you’re absent or late, or leave early, you must provide your

manager with an honest reason or explanation. You must also inform your manager of the expected duration of any absence. The Company will

comply with applicable laws relating to time off from work, but it is your responsibility to provide sufficient information to enable the Company to

make a determination. You must notify your manager of any change in your status as soon as possible.

* **Job Abandonment:** An absence of two (2 ) consecutive

scheduled workdays or more, which has not been reported, will be considered as job abandonment, i.e. voluntary resignation

on the part of the associate. Wages will cease to be paid as of the first day of absence.

* **Acceptable Attendance:** Acceptable attendance is defined as

having less than 4 full or partial day, unscheduled absences in a 6-month period. An unscheduled absence is defined as an

absence, not previously planned, which was taken with less

than 24 hours’ notice. Those with unacceptable attendance are

subject to disciplinary measures, up to and including termination per our progressive discipline policy.

#### Dress Code and Personal Appearance

Company associates are always expected to present a professional, business- like image to customers, prospects, and the public, which

specifically includes wearing Company- logo apparel in the workplace. Each associate’s dress, grooming, and personal hygiene should be appropriate to their respective work situation. Favorable personal appearance, like proper maintenance of work areas, is an ongoing requirement of employment with Spec Chem.

At its discretion, the Company may allow associates to dress in a more casual fashion than is normally required. On such occasions, associates are still

expected to present a neat appearance and avoid inappropriate clothing.

#### Communication

During your employment with SpecChem, you will have certain

responsibilities and obligations to our Company and the people with whom you work. Your best effort and good judgment on the job are expected.

In addition, we ask you to use common sense and intelligence in your

conduct on the job. This implies your commitment to Company expectations, such as maintaining high standards of performance and productivity, care of Company equipment, good safety, regular attendance, support of Company

Programs, good work habits, cooperation with and consideration of your

work associates, and fair representation of SpecChem in your dealings with people outside your work environment.

Two-way communication is essential to the successful operation of our

business. You are encouraged to communicate with us if a problem develops or if you want to discuss a new idea about your job.

The Company is committed to open and supportive communication between all associates daily. During a normal workday, we recognize that you may

have a question or problem concerning your job or workplace. Unless the question or problem is addressed promptly, it may become larger than it

needs to be. For this reason, you are encouraged to approach your manager informally whenever a question or problem arises, so it can be answered or corrected as quickly as possible.

#### Associate Complaint Procedure

The Company’s complaint procedure provides for an immediate, thorough, and objective investigation of any claim of unlawful or

prohibited harassment, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies for any victim of harassment. A claim of harassment may exist even if the

associate has not lost a job or some economic benefit.

If you believe you have been harassed on the job, or if you are aware of the harassment of others, you should provide a written or verbal

complaint to the Owner of the Company as soon as possible. Your

complaint should be as detailed as possible, including the names of

individuals involved, the names of any witnesses, direct quotations when language is relevant, and any documentary evidence (notes, pictures,

cartoons, and etcetera).

Applicable law also prohibits retaliation against any associate by another associate or by the Company for using this complaint procedure or for

filing, testifying, or assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a governmental enforcement agency. Additionally, the Company will not permit any

retaliation against any associate who complains of prohibited harassment or who participates in an investigation.

All incidents of prohibited harassment that are reported will be

investigated. The Company will immediately undertake or direct an effective, thorough, and objective investigation of the harassment

allegations. The investigation will be completed and a determination

regarding the reported harassment will be made and communicated to the associate who complained and to the accused harasser( s).

If the Company determines that prohibited harassment has occurred,

management will take effective remedial action commensurate with the circumstances. Appropriate action will also be taken to deter any future harassment. If a complaint of prohibited harassment is substantiated,

appropriate disciplinary action, up to and including discharge, will be taken.

Any associate of our Company, whether a co-worker or manager, who is

found to have engaged in prohibited harassment is subject to disciplinary action, up to and including discharge from employment. Any associate,

who engages in prohibited harassment, including any manager or

supervisor who knew about the harassment but took no action to stop it, may be held accountable and subject up to and including termination.

Managers and supervisors who knew about harassment and took no action to stop it or failed to report the harassment to their management or the Owner of the Company may also be subject to discipline up to and

including termination of employment. The Company does not consider conduct in violation of this policy to be within the course and scope of

employment or the direct consequence of the discharge of one's duties.

Accordingly, to the extent permitted by law, the Company reserves the

right not to provide a defense or pay damages assessed against associates for conduct in violation of this policy.

#### Performance Management

Performance Management is a process that provides a means by which both the Company and its associates may attempt to remedy conflicts or concerns regarding job or behavioral performance. Corrective action is intended to be treated as an opportunity for improvement.

When an associate's performance, attendance, conduct, etc., is less than satisfactory, as determined by the Company, corrective measures may be taken to give that associate the opportunity to improve and meet

objectives. When the Company decides to utilize corrective action,

associates will be informed of unsatisfactory work performance or behavior and will be given suggestions for correcting such performance or behavior within reasonable time limits.

The Performance Management Process at SpecChem can range from informal discussions of concerns and possible solutions where less serious issues are being addressed, to formalized corrective measures with specified timelines for completion for more serious situations or in cases in which informal

discussions do not resolve the issue. Corrective action may lead to

suspension and/or termination of employment. This statement about corrective action does not alter the at-will employment relationship,

meaning that employment with the Company may be terminated at any time for any reason with or without cause or notice. Examples of some of the

types of conduct that normally lead to immediate termination of employment include, but are not limited to:

* Any act of dishonesty, including theft, misappropriation of money or time.
* Any act which calls into question one's integrity, such as falsification of

Company records and documents, including employment applications and timecards, competing in business with the Company, unauthorized

disclosure of confidential or proprietary information or engaging in any criminal conduct which may affect the Company and its reputation.

* Any act which may create a dangerous situation, assault or otherwise

harassing another person on Company premises or disregard of property and safety standards, including possession of firearms or other weapons while on Company premises.

* Any improper act or threat thereof which may be harmful to the mental, physical, or emotional well-being of another.
* Improperly interfering in any way with another associate's ability to effectively perform their job duties.
* The use of illegal or unauthorized substances on Company premises or

reporting to work while under the influence of the same, or otherwise in a condition not fit for work.

* The use of illegal or unauthorized substances on Company premises or

reporting to work while under the influence of the same, or otherwise in a condition not fit for work.

* Refusal to adhere to attendance or time keeping regulations (including excessive absenteeism or tardiness) or failure to call in or report

absences to your manager.

* Using Company time, materials, or equipment for unauthorized or personal use.
* Disorderly conduct or gross dereliction of duty.
* Any violation of stated Company policy.

###### Progressive Discipline

While most associates generally perform their duties in a professional and businesslike manner, it is occasionally necessary to apply corrective

discipline due to improper behavior, unsatisfactory work performance,

absenteeism, violation of Company rules, etc. If such disciplinary action is required, the following steps will be followed. Note that skipping a step in the process may be warranted based on Associate’s actions.

* 1. **Verbal Warning** – When an associate fails to maintain standards or has broken a rule, a verbal warning will be given stating that repetition of this behavior may eventually call for further disciplinary action. A

note will be made of the warning and placed in associate’ s personnel file.

* 1. **Written Warning** – A written warning will be issued if a verbal warning does not produce the expected results. This warning will outline the

deficiencies in behavior or performance and what measures are to be taken to correct the situation. A copy of this signed written warning will be placed in an associate’s personnel file.

* 1. **Final Warning** – A final warning will be given if the verbal and written warnings have not produced the desired results. The warning will

describe the required change in the associate’ s behavior and attitude,

as well as what the next disciplinary step will be if the change does not materialize.

* 1. **Termination –** In the event that the improper behavior has not been

corrected by the preceding actions, termination will be recommended.

* 1. **Immediate Termination –** In cases of improper behavior such as

dishonesty, deliberate destruction of property, gross misconduct,

insubordination, excessive absenteeism, falsification of records, safety violations, etc. immediate termination may be warranted.

###### Performance Appraisals

Performance reviews will be conducted annually. You are encouraged to seek guidance and direction from your manager to maximize your current

performance and to develop your potential. The Company expects that you and your manager will regularly interact on an informal basis so that you

can provide your manager with feedback on how they can better assist you, and so that your manager can coach you on ways to enhance your

performance and skills.

The Company also believes it is important to formalize performance feedback on at least an annual basis. As such, associates receive regular performance

appraisals. Our review process is designed to help you and your manager

set measures and timelines for continuing to improve performance and skills and determine a strategy for advancing the scope of your position and your career.

As a part of the review process, you will be asked to assess your

accomplishments during the period in review to ensure that any significant accomplishments are not overlooked. The associate performance appraisal process should accomplish the following objectives:

* Provide you with full and accurate information concerning your performance
* Identify performance elements in which you do well and those elements which require improvement
* Establish plans to correct performance shortcomings
* Provide a basis for linking your performance to merit increase considerations
* Design a plan for training and development toward continued job growth and career enhancement

You are encouraged to comment on your appraisal and will be asked to

acknowledge it by signing the review form. Note that a positive performance review does not guarantee a raise or even continued employment. Nothing in this policy changes or limits the employment at-will relationship.

###### Associate Dating Policy

Spec Chem believes that a work environment where associates maintain

clear boundaries between associate personal and business interactions is necessary for effective business operations. Although this policy does not prevent the development of friendships or romantic relationships between co-workers, it does establish boundaries as to how relationships are

conducted during working hours and within the working environment.

Individuals in supervisory or managerial roles, and those with authority over others’ terms and conditions of employment, are subject to more

stringent requirements under this policy due to their status as role models, their access to sensitive information, and their ability to affect the

employment of individuals in subordinate positions. If you enter into a romantic relationship which can impact the business of Spec Chem or

employment decisions of another associate, please contact HR to review the Consensual Relationship Agreement.

Any concerns about the administration of this policy should be addressed to human resources.

###### Workplace Violence

Spec Chem works hard to ensure we recognize and react to situations that

could threaten the safety of our Company's associates, associates, visitors, customers, and/or property. We have created this policy in an effort to help associates identify and deal effectively with threats or acts of violence.

Acts or threats of physical violence, including intimidation, harassment

and/or coercion, which involve or affect the Company, or which occur on Company property, will not be tolerated. This prohibition against threats

and acts of violence applies to all persons involved in the operation of the Company, including, but not limited to Company personnel, contract and

temporary workers and anyone else on Company property. Violations of this policy, by any individual, will lead to disciplinary and/or legal action as

appropriate.

Workplace violence is any intentional conduct which is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for

his/her personal safety or the safety of his/her family, friends and/or

property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several Company

associates.

Examples of workplace violence include, but are not limited to, the following:

* Threats or acts of violence occurring on Company premises, regardless of the relationship between the Company and the parties involved in the

incident.

* Threats or acts of violence occurring off Company premises involving someone who is acting in the capacity of a representative of the

Company.

* Threats or acts of violence occurring off Company premises involving an associate of the Company if the threats or acts affect the business

interests of the Company.

* Threats or acts of violence occurring off Company premises of which an associate of the Company is a victim if the Company determines that the incident may lead to an incident of violence on Company premises.

Threats or acts resulting in the conviction of an associate or agent of the Company, or of an individual performing service for the Company on a

contract or temporary basis, under any criminal code provisions relating to violence or threats of violence which adversely affect the legitimate

business interests of the Company.

Specific examples of conduct which may be considered threats or acts of violence under this policy, include, but are not limited to the following:

* Threatening physical or aggressive contact directed toward another individual
* Threatening an individual or his/her family, friends, associates, or property with harm
* The intentional destruction or threat of destruction of Company property or another' s property
* Harassing or threatening phone calls, letters, or emails
* Surveillance
* Stalking
* Veiled threats of physical harm or like intimidation

Workplace violence does not refer to occasional comments of a socially acceptable nature. Such comments may include references to legitimate

sporting activities, popular entertainment or current events. Rather, it refers to behavior that is personally offensive, threatening or intimidating.

You are expected to be aware of your surroundings and to report any

suspicious behaviors or people to management, or in times of emergency

directly to the police. If an act or threat of violence occurs in your presence, stay calm and do not attempt to stop the perpetrator in any way that puts

you in a position to be harmed. Do not attempt to take a weapon away from a perpetrator or stop them through any physical means. Try to remember as many details about the incident and the perpetrator ( such as physical

appearance, dress, manner, and speech) as possible. Comply with his/her demands as best you can and only attempt to notify outsiders for help if it

would be safe to do so. In most all cases, especially those involving weapons such as guns, it will only be safe to send for help and notify the police once you are confident the perpetrator has left the premises. Do not touch

anything or disturb the scene while waiting for the police to arrive and be sure to cooperate fully with police investigations of the incident.

All incidents of violence and threats of violence that are reported will be investigated. Any person who engages in a threat or violent action on

Company property may be removed from the premises as quickly as safety permits and may be required, at the Company discretion, to remain off

Company premises pending the outcome of an investigation into the incident.

When threats are made or a Company associate commits acts of violence, a judgment will be made by the Company as to what actions are appropriate, including possible medical evaluation and/or possible disciplinary action.

Once a threat has been substantiated, it is Company’ s policy to put the threat maker on notice that he/she will be held accountable for his/her

actions and then follow through with the implementation of a decisive and appropriate response.

Under this policy, decisions may be needed to prevent a threat from being carried out, a violent act from occurring or a life-threatening situation from developing. No existing Company policy or procedure should be interpreted in a manner that prevents the above from occurring.

**\*IMPORTANT NOTE:** The Company will make the sole determination of whether, and to what extent, threats or acts of violence will be acted upon by the

Company. In making this determination, the Company may undertake a case-by- case analysis in order to ascertain whether there is a reasonable basis to

believe that workplace violence has occurred. No provision of this policy shall alter the at-will nature of employment at SpecChem.

###### Open Door Policy

Spec Chem encourages all associates to take an "Open Door" approach to

sharing ideas, constructive feedback, and concerns. We realize that problems often stem from lack of communication, miscommunication, and

misunderstandings. You are encouraged to bring your concerns to the

attention of your manager and attempt to resolve any issues informally. You and your manager are further encouraged to interact frequently in the

interest of developing healthy l ines of mutual communication and constructive feedback.

If you are hesitant to discuss concerns with your manager, or if you are not

satisfied with measures taken by your manager, you may take your concern to human resources or Company management for further assistance.

###### Safety

It is Spec Chem’s intention to provide a safe and healthy work environment for associates. In fulfilling this obligation, Spec Chem provides modern

equipment and work facilities for your use on the job, which meet the

standards prescribed in applicable Workers’ Compensation and Occupational Safety and Health laws.

A working environment is only as safe as people make it. SpecChem

encourages you to use good safety habits whether at home or at work.

We also encourage your participation in accident prevention. If you become aware of any unsafe working condition or a faulty piece of equipment, that my cause an injury, you must report the situation to Spec Chem as soon as

possible.

###### Reporting Injuries

Regardless of good intentions on the part of you or the Company, accidents do occasionally happen. If you receive any type of injury or are aware of any type of property damages on the job, inform your supervisor immediately, if possible, but in any event not later than the end of your shift. If medical

treatment is required, your supervisor must be notified before such

treatment is administered. You will be treated by a Company approved physician, unless otherwise authorized. Any time lost from your job as a

result of an industrial injury must be substantiated by attending physician. Failure to report a work-related injury may result in loss of Workers’

Compensation benefits.

Any property damaged in an accident in which the Company may in any way be involved, no matter how trivial, must be reported on the day of

occurrence in writing. Any associate having knowledge of or being a witness to any accident must also report all relevant information in writing on the

day of occurrence.

###### Cell Phones, Radios & Headphones

Production Associates may use cell phones during breaks in break rooms. Production Associates are not to use cell phones on the production floor.

Managers and Assistant Managers should carry their company phones at all

times. Cell phones can stay in an associate's vehicle, in the Manager’ s office, in a locker, or in the Plant’s Break Room. For emergencies, all associates will be given both managers’ numbers and the number to the plant’s office.

Music in each department is limited to one stationary AM/FM radio. Radios will maintain professional volume and content, both determined by

management’ s discretion. Additionally, headphones will not be used in any capacity on the production floor.

###### Social Media Policy

This policy provides guidance for associate use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis,

microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

**PROCEDURES**

The following principles apply to professional use of social media on behalf

of SpecChem, as well as personal use of social media when referencing

Spec Chem. \*\*Please note that tagging yourself as an associate of SpecChem is an example of referencing the company.

* Associates need to know and adhere to the SpecChem Code of Conduct,

Associate Handbook, and other company policies when using social media in reference to Spec Chem.

* Associates should be aware of the effect their actions may have on their images, as well as SpecChem’s image. The information that associates

post or publish may be public information for a long time.

* Associates should be aware that Spec Chem may observe content and information made available by associates through social media.

Associates should use their best judgment in posting material that is neither inappropriate nor harmful to SpecChem, its associates, or

customers.

* Although not an exclusive l ist, some specific examples of prohibited

social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous,

violent, or that can create a hostile work environment.

* Associates are not to publish, post or release any information that is

considered confidential or not public. If there are questions about what is considered confidential, associates should check with the Human

Resources Department and/or supervisor.

* Social media networks, blogs and other types of online content

sometimes generate press and media attention or legal questions. Associates should refer these inquiries to authorized

Spec Chem spokespersons.

* If associates encounter a situation while using social media ( with respect to SpecChem) that threatens to become antagonistic, associates should

disengage from the dialogue in a polite manner and seek the advice of a supervisor.

* Associates should get appropriate permission before referring to or

posting images of current or former associates, vendors, or suppliers.

Additionally, associates should get appropriate permission to use a third party' s copyrights, copyrighted material, trademarks, service marks or

other intellectual property.

* Social media use shouldn't interfere with associate’s responsibilities at Spec Chem. Spec Chem’s computer systems are to be used for business

purposes only. When using SpecChem’s computer systems, use of social media for business purposes is allowed ( ex: Facebook, Twitter, blogs and Linked In), but personal use of social media networks or personal blogging

of online content should be limited and is discouraged if it poses a distraction. Failure to use social media responsibly could result in disciplinary action.

* Subject to applicable law, after-hours online activity that violates

Spec Chem’s Code of Conduct or any other company policy may subject an associate to disciplinary action or termination.

* It is highly recommended that associates keep SpecChem- related social media accounts separate from personal accounts, if practical.

# Separation from SpecChem

###### Types of Separation

* 1. **Voluntary Separation -** Company associates are associates “at will” and may terminate the employment relationship at any time. An associate may submit their resignation at any time. While it is preferred that the associate give two-week notice of resignation, it is not a requirement.

When notice is given, however, the Company reserves the right to

terminate employment prior to the effective date stated in the notice. Such a termination is considered as an associate-initiated termination. ***Procedures***

1. Associates are requested to provide a minimum of two weeks’ notice of their intention to separate employment. The associate should / will

need to provide a written resignation notification to his or her

manager. Verification of termination will not be provided if these above two steps are not followed.

1. Upon receipt of an associate’ s resignation, the manager will notify the human resource ( HR) department by sending a copy of the resignation letter and any other pertinent information (e. g., associates’ reason for leaving, last day of work).
2. The HR department will coordinate the associate’ s departure from the company. This process will include the associate returning all company property, a review of the associates post-termination benefits status

and the employee’ s completion of an exit interview.

* 1. **Involuntary Separation -** As previously stated, Company associates are associates “at will” and, as such, their employment may be terminated at any time, with or without cause. Employment will not be terminated for unacceptable job performance behavior, unless an associate has

been advised that his or her performance behavior is unacceptable.

***The following are some examples of unacceptable performance behaviors:***

* + - Excessive absences or tardiness.
    - Unacceptable performance as it relates to either quantity or quality of work assigned.
    - Failure to follow instructions directly related to the performance of the job.
    - Certain situations warrant a departure from the normal procedures

listed above.

**The following are examples of acts that will result in**

**immediate termination (zero tolerance); please note that this list is not meant to be all-inclusive:**

* + - * Dishonesty, such as theft, fraud, embezzlement, or falsification of Company documents.
      * Falsification of, or misrepresentation in, the Employment Application or any other employment documents.
      * Illegal and / or criminal acts.
      * Physical Violence.
      * Safety Violations.
      * Bringing firearms or weapons onto company premises or carrying them while on company business.
      * Reporting to work under the influence, or the unauthorized consumption or possession, while on Company business or

premises, of intoxicants or controlled substances which have not been prescribed for medical reasons by a licensed

physician.

* + - * Harassment or discriminatory conduct based on sex, race,

color, religion, age, disability, citizenship, or national origin.

* + - * Unauthorized solicitation and / or distribution of literature.
      * Violation of other Company rules, regulations or policies.
      * Conduct which causes management to lose confidence in the

associate’s ability to perform his or her job, or which adversely reflects upon or affects the Company or its associates.

* + - * Unauthorized absence from work.
      * Company Reduction- in-Force.

###### Rehire Process

If you leave Spec Chem in good standing, classified as eligible for rehire, you may be considered for re-employment.

# Other Policies

###### Security

It is imperative to our mutual success that we protect Company material,

products and ideas from loss. We must maintain reasonable control over the entrance to Company facilities and access to records, information, cash and other items of monetary value. Security goes beyond the scope of the

Company's Agreements with associates, business, and personal ethics. Security is an attitude of caution and discretion in handling confidential information,

whether for internal or external disclosure. The success of our Company

depends on this, and misuse or disclosure of confidential information can hurt both the associate and the Company.

###### Internal Communications

Associates are encouraged to check the company postings regularly in the break room and common areas for employment laws and other matters of importance.

###### External Communications

The Company requires associates to avoid the unauthorized disclosure of any nonpublic information acquired in the workplace. When deciding whether to disclose any information, err on the side of non-disclosure.

Quite often associates have a good sense of how the Company is performing in comparison to competitors and in comparison to our internal goals and

objectives, far before this information becomes public knowledge. The

Company believes strongly that you should be aware of the performance

standards and accomplishments of the Company, as this information will help you to better understand your role and potential contributions to the success

of our Company and your career growth. However, it is important that you

recognize the significant effect this information may have in determining the value of the Company.

###### Outside Employment/Conflicts of Interest

Certain outside interests and relationships may have the potential of creating a conflict of interest between you and our Company. As such, the Company must

observe guidelines pertaining to acceptable outside business or business-

related pursuits of its associates. The following, though not an exhaustive list, are examples of potentially compromising situations that may constitute a

conflict of interest and, as such, must be avoided:

* Revealing confidential information to outsiders or misusing confidential information irrespective of whether for personal gain and whether harm to the Company is intended
* Borrowing from or lending to associates or customers
* Improperly using or disclosing to the Company any proprietary

information or trade secrets of any former or concurrent employer or other person or entity with whom obligations of confidentiality exist

* Discussing prices, costs, customers, sales or markets with competing companies or their associates
* Making any unlawful agreements with distributors with respect to prices
* An associate taking a second job working for a competitor and sharing confidential company information with the competitor
* An associate taking a second job that interferes with their ability to do their work for the company at their full potential, whether due to

scheduling, exhaustion, or some other factor

* Engaging in any conduct which is not in the best interest of the Company

All Company associates, contractors and temporary personnel must take

necessary action to ensure that they do not engage in any activity that might

cause a conflict of interest. You must bring any concerns to the attention of the Owner of the Company. Violations of this standard may result in immediate

termination.

###### Electronic Communication Policy

Electronic communication (EC) tools provided by the Company include, but are not limited to, E-mail, voice mail, electronic forms, Internet, Intranets, and Fax. These tools are important resources that enhance our competitive advantage in the economic marketplace by improving internal and external communications with internal and external sources of information. EC is provided to Company

associates to improve communications and relationships between other associates, customers, suppliers, business partners and key professional

organizations. Furthermore, it assists in gathering information from internal

and external resources to increase knowledge, further education, and advance research for business purposes.

This Electronic Communication Usage Policy provides guidelines to assist in the effective and appropriate use of EC. In our rapidly changing technological

environment, the Company cannot address every situation for appropriateness due to information technology’ s vast complexities. The Company’s intent is for each associate to use Company assets, including EC and the access inherent for the benefit of, in the best interest of, and in a manner that does not conflict

with our Company’s policies, procedures, and business objectives. This policy

shall apply to every associate who uses EC and equivalent services through the use of any technologies or services owned or provided by the Company. This

includes, but is not l imited to: fax machines, phone lines, modems, computers, the company’s Local Area and Wide Area Networks, electronic bulletin board

providers or other commercial service providers (e.g. America Online, Prodigy, Microsoft Network, etc.). Company computers, computer networks, and other EC tools and devices are company owned resources and are subject to

monitoring by the Company and management reserves the right to not only access any EC messages, but also monitor or record them.

In using EC, associates must use integrity and professionalism in all

communications. In addition, associates must make all reasonable efforts to

protect Company information, assets and intellectual property. Personal views on controversial matters or matters affecting the Company should not be

expressed through the use of EC; to the extent that EC is used in personal

communications, care should be taken to avoid any possible implication that any view or statement contained therein is that of, or is authorized by

management. Additionally EC users should create messages as they would a hardcopy document or memo; they should not be informal or conversational. EC communications exchanged with entities and individuals outside of the

Company are not secured from outside access and monitoring.

External communications should be viewed as open to the public domain, and should not contain confidential or proprietary information about the Company its customers, associates, business objectives or interests. Associates shall

have no expectation of privacy concerning EC use. The Company does not guarantee the privacy or integrity of any given communication. Should you

have any question regarding our EC policy, you should discuss your questions with your manager prior to engaging in any activity about which you are

uncertain. Violation of the above terms and conditions is a serious offense and may result in access of privileges being withdrawn, as well as disciplinary

actions up to and including termination of employment.

###### Company Cell Phones/Laptops

Mobile Devices or laptop computers owned by Specchem and used to conduct business must be used appropriately, responsible, and ethically. The following must be observed:

* Company- owned Mobile Devices are the property of Specchem and must be treated, used, and safeguarded as such. If an associate damages or

loses a company-issued Mobile Device or laptop, the associate must repair or replace it.

* No associate is to use company-owned devices for the purpose of illegal transactions, harassment, or obscene behavior, in accordance with other existing associate policies.
* Associates are prohibited from using a company-issued mobile device while operating a motor vehicle unless utilizing a hands-free device.

Further, if state or local laws are more restrictive, the associate must follow the appropriate law.

###### Emergency Plan Obligations

If, for any reason, an emergency situation requires evacuation from the physical building, you are obligated to do the following:

1. Immediately contact your supervisor. Attempt to call the office

phone and/or contact your supervisor at home. (You should keep your supervisor’s home phone number handy.)

Remember to leave your home number or the number where you can be reached with your supervisor.

1. You are on stand-by status. You must call in every four hours unless otherwise notified.

**If you cannot contact your supervisor, call Liz or Greg Maday at 913- 236-9449 or Mike Shull at 913-713-2243.**

## Company Car Policy For Outside Sales Associates

Option 1:\* Spec Chem will purchase a new or program car not to exceed $ 28 , 000 gross ( before trade and tax). This will be at the discretion of the

company and must be an American made car. Sales person will have unlimited use, both business and personal. Spec Chem to provide for

insurance, gas, tags, taxes and maintenance and repairs. Salesperson responsible for determining personal usage. W-2 will reflect personal usage and you will be taxed in accordance with IRS Regulations.

Expected trade every 120 , 000 miles.

Option 2 : Spec Chem will provide a monthly car allowance of $ 500 .00 . Salesperson will be responsible for using his/ her car for company use. Salesperson will be responsible for providing own insurance, tags, taxes,

maintenance and repairs. Spec Chem will provide gas. W-2 will reflect “ car allowance” as additional wages just as it does now with company

car, i .e. no FICA, or Social Security obligations. Salesperson responsible for determining company usage and reflect as expense on personal

income tax returns. Car allowance will not be included in base with

regards to expense multiplier; gas provided by company will be included in multiplier.

Option 3 : Spec Chem will pay 30 ¢/ mile driven on the company’ s behalf. Sales

person will be responsible for using his/ her car for company use. Sales person will be responsible for providing gas, insurance, tags, taxes,

maintenance and repairs. W-2 will reflect additional compensation, and as above, there are no additional FICA or Social Security obligations.

Mileage allowance will not be included in base with regards to expense multiplier.

\* All cars must be 4 - doors and preferably American made.

## Personal Auto Reimbursement

1. Associates are only authorized to use his/ her automobile if they have both a valid driver’ s license and current comprehensive auto insurance, including l iability. I f not, the associate is not authorized to travel for the company.
2. When an associate uses his/ her personal automobile on approved company

business, the company will pay .30 cents per mile. Company will also reimburse all actual auto tolls and parking fees, with a receipt.

1. Mileage from associate's home to regular assigned work location is not a

reimbursable expense. However, if the associate goes directly from home to another work assignment other than the regular work location, and the distance to the work assignment i s greater than the distance to the regular work location, the associate

can expense the difference.

1. To receive reimbursement for mileage, the associate must complete an expense

report specifying purpose of trip, start and finish odometer reading, point of origin, destination and time of trip.

1. The associate assumes the responsibility for all parking and traffic fines.

## Information Sensitivity Policy

##### Purpose

The Information Sensitivity Policy is intended to help associates determine what information can be disclosed to non-associates, as well as the relative sensitivity of information that should not be disclosed outside of SpecChem without proper authorization.

The information covered in these guidelines includes, but is not limited to, information that is either stored or shared via any means. This includes: electronic information, information on paper, and information shared orally or visually (such as telephone and video conferencing).

All associates should familiarize themselves with the information labeling and handling guidelines that follow this introduction. It should be noted that the sensitivity level definitions were created as guidelines and to emphasize common sense steps that you can take to protect SpecChem Confidential information (e.g., SpecChem Confidential information should not be left unattended in conference rooms).

*Please Note: The impact of these guidelines on daily activity should be minimal.*

Questions about the proper classification of a specific piece of information should be addressed to your manager. Questions about these guidelines should be addressed to SpecChem.

##### Scope

###### All SpecChem information is categorized into two main classifications: SpecChem Public

**SpecChem Confidential**

SpecChem Public information is information that has been declared public knowledge by someone with the authority to do so, and can freely be given to anyone without any possible damage to SpecChem Systems, Inc.

SpecChem Confidential contains all other information. It is a continuum, in that it is understood that some information is more sensitive than other information, and should be protected in a more secure manner. Included is information that should be protected very closely, such as trade secrets, development programs, potential acquisition targets, and other information integral to the success of our company. Also included in SpecChem Confidential is information that is less critical, such as telephone directories, general corporate information, personnel information, etc., which does not require as stringent a degree of protection.

A subset of SpecChem Confidential information is "SpecChem Third Party Confidential" information. This is confidential information belonging or pertaining to another corporation which has been entrusted to SpecChem by that company under non-disclosure agreements and other contracts. Examples of this type of information include everything from joint development efforts to vendor lists, customer orders, and supplier information. Information in this category ranges from extremely sensitive to information about the fact that we've connected a supplier / vendor into SpecChem's network to support our operations.

SpecChem personnel are encouraged to use common sense judgment in securing SpecChem Confidential information to the proper extent. If an associate is uncertain of the sensitivity of a particular piece of information, he/she should contact their manager

##### Policy

The Sensitivity Guidelines below provides details on how to protect information at varying sensitivity levels. Use these guidelines as a reference only, as SpecChem Confidential information in each column may necessitate more or less stringent measures of protection depending upon the circumstances and the nature of the SpecChem Confidential information in question.

##### Minimal Sensitivity

General corporate information; some personnel and technical information Marking guidelines for information in hardcopy or electronic form.

Note: any of these markings may be used with the additional annotation of "3rd Party Confidential".

Marking is at the discretion of the owner or custodian of the information. If marking is desired, the words "SpecChem Confidential" may be written or designated in a conspicuous place on or in the information in question. Other labels that may be used include "SpecChem Proprietary" or similar labels at the discretion of your individual business unit or department. Even if no marking is present, SpecChem information is presumed to be "SpecChem Confidential" unless expressly determined to be SpecChem Public information by a SpecChem associate with authority to do so.

Access: SpecChem associates, contractors, people with a business need to know.

**Distribution within SpecChem:** Standard interoffice mail, approved electronic mail and electronic file transmission methods.

Distribution outside of SpecChem internal mail: U.S. mail and other public or private carriers, approved electronic mail and electronic file transmission methods.

Electronic distribution: No restrictions except that it be sent to only approved recipients.

Storage: Keep from view of unauthorized people; erase whiteboards, do not leave in view on tabletop. Machines should be administered with security in mind. Protect from loss; electronic information should have individual access controls where possible and appropriate.

Disposal/Destruction: Deposit outdated paper information in specially marked disposal bins on SpecChem premises; electronic data should be expunged/cleared. Reliably erase or physically destroy media.

Penalty for deliberate or inadvertent disclosure: Up to and including termination, possible civil and/or criminal prosecution to the full extent of the law.

##### More Sensitive

Business, financial, technical, and most personnel information Marking guidelines for information in hardcopy or electronic form.

Note: any of these markings may be used with the additional annotation of "3rd Party Confidential". As the sensitivity level of the information increases, you may, in addition or instead of marking the information "SpecChem Confidential" or "SpecChem Proprietary", wish to label the information "SpecChem Internal Use Only" or other similar labels at the discretion of your individual business unit or department to denote a more sensitive level of information. However, marking is discretionary at all times.

Access: SpecChem associates and non-associates with signed non-disclosure agreements who have a business need to know.

Distribution within SpecChem: Standard interoffice mail, approved electronic mail and electronic file transmission methods.

Distribution outside of SpecChem internal mail: Sent via U.S. mail or approved private carriers.

Electronic distribution: No restrictions to approved recipients within SpecChem, but should be encrypted or sent via a private link to approved recipients outside of SpecChem premises.

Storage: Individual access controls are highly recommended for electronic information.

Disposal/Destruction: In specially marked disposal bins on SpecChem premises; electronic data should be expunged/cleared. Reliably erase or physically destroy media.

Penalty for deliberate or inadvertent disclosure: Up to and including termination, possible civil and/or criminal prosecution to the full extent of the law.

* 1. Most Sensitive

Trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company

Marking guidelines for information in hardcopy or electronic form.

**Note:** *any of these markings may be used with the additional annotation of "3rd Party Confidential". To indicate that SpecChem Confidential information is very sensitive, you may should label the information "SpecChem Internal: Registered and Restricted", "SpecChem Eyes Only", "SpecChem Confidential" or similar labels at the discretion of your individual business unit or department. Once again, this type of SpecChem Confidential information need not be marked, but users should be aware that this information is very sensitive and be protected as such.*

Access: Only those individuals (SpecChem associates and non-associates) designated with approved access and signed non-disclosure agreements.

Distribution within SpecChem: Delivered direct - signature required, envelopes stamped confidential, or approved electronic file transmission methods.

Distribution outside of SpecChem internal mail: Delivered direct; signature required; approved private carriers.

Electronic distribution: No restrictions to approved recipients within SpecChem, but it is highly recommended that all information be strongly encrypted.

Storage: Individual access controls are very highly recommended for electronic information. Physical security is generally used, and information should be stored in a physically secured computer.

Disposal/Destruction: Strongly Encouraged: In specially marked disposal bins on SpecChem premises; electronic data should be expunged/cleared. Reliably erase or physically destroy media.

Penalty for deliberate or inadvertent disclosure: Up to and including termination, possible civil and/or criminal prosecution to the full extent of the law.

##### Enforcement

Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

##### Definitions

|  |  |
| --- | --- |
| Term | Definition |

|  |  |
| --- | --- |
| Appropriate measures | To minimize risk to SpecChem from an outside business  connection. SpecChem computer use by competitors and unauthorized personnel must be restricted so that, in the event of an attempt to access SpecChem corporate information, the amount of information at risk is minimized. |
| Configuration of  SpecChem-to- other  business connections | Connections shall be set up to allow other businesses to see only what they need to see. This involves setting up both applications and network configurations to allow access to only what is necessary. |
| Delivered Direct  Signature Required | Do not leave in interoffice mail slot, call the mail room for special pick-up of mail. |
| Approved Electronic File Transmission Methods | Includes supported FTP clients and Web browsers. |
| Envelopes Stamped  Confidential | You are not required to use a special envelope. Put your  document(s) into an interoffice envelope, seal it, address it, and stamp it confidential. |
| Approved Electronic Mail | Includes all mail systems supported by the IT Support Team. These include, but are not necessarily limited to, [insert corporate supported mailers here…]. If you have a business need to use other mailers contact the appropriate support organization. |
| Approved Encrypted email and f iles | Techniques include the use of DES and PGP. DES encryption is available via many different public domain packages on all platforms. PGP use within SpecChem is done via a license. Please contact the appropriate support organization if you require a license. |
| Company Information System Resources | Company Information System Resources include, but are not limited to, all computers, their data  and programs, as well as all paper information and any information at the Internal Use Only level and above. |
| Expunge | To reliably erase or expunge data on a PC or Mac you must use a separate program to overwrite  data, supplied as a part of Norton Utilities. |

|  |  |
| --- | --- |
|  | Otherwise, the PC or Mac's normal erasure routine  keeps the data intact until overwritten. The same thing happens on UNIX machines, but data is much more difficult to retrieve on UNIX systems.  Individual Access Controls Methods of  electronically protecting fi les from being accessed by people other than those specifically designated by the owner. On UNIX machines, this is  accomplished by careful use of the chmod  command (use *man chmod* to find out more about it). On Mac’s and PC' s, this includes using  passwords on screensavers, such as Disklock. |
| Insecure Internet Links | All network links that originate from a locale or  travel over lines that are not totally under the |
| Encryption | control of Spec Chem.  Secure Spec Chem Sensitive information in  accordance with the *Acceptable Encryption Policy* .  International issues regarding encryption are  complex. Follow corporate guidelines on export controls on cryptography, and consult your  manager and/or corporate legal services for further guidance. |
| One Time Password | Authentication on Internet connections is  accomplished by using a one time password token to connect to SpecChem's internal network over  the Internet. Contact your support organization for more information on how to set this up. |
| Physical Security | Physical security means either having actual  possession of a computer at all times, or locking the computer in an unusable state to an object  that is immovable. Methods of accomplishing this include having a special key to unlock the  computer so i t can be used, thereby ensuring that the computer cannot be simply rebooted to get  around the protection. If it is a laptop or other portable computer, never leave it alone in a  conference room, hotel room or on an airplane  seat, etc. Make arrangements to lock the device in a hotel safe, or take i t with you. In the office,  always use a lockdown cable. When leaving the  office for the day, secure the laptop and any other sensitive material in a locked drawer or cabinet. |
| Private Link | A Private Link is an electronic communications  path that Spec Chem has control over i t's entire |

distance. For example, all Spec Chem networks are connected via a private link. A computer with

modem connected via a standard land l ine (not

cell phone) to another computer have established a private link. ISDN lines to associate's homes is a private l ink. Spec Chem also has established

private links to other companies, so that all email correspondence can be sent in a more secure

manner. Companies which Spec Chem has

established private l inks include all announced

acquisitions and some short- term temporary links

Technology Equipment Disposal Policy

##### Overview

Technology equipment often contains parts which cannot simply be thrown away.

Proper disposal of equipment is both environmentally responsible and often

required by law. In addition, hard drives, USB drives, CD-ROMs and other storage media contain various kinds of Spec Chem data, some of which is considered

sensitive. In order to protect our constituent’s data, all storage mediums must be properly erased before being disposed of. However, simply deleting or even

formatting data is not considered sufficient. When deleting files or formatting a device, data is marked for deletion, but is still accessible until being overwritten by a new file. Therefore, special tools must be used to securely erase data prior to equipment disposal.

##### Purpose

This policy has been developed to define the requirements for proper disposal of technology equipment at Spec Chem.

##### Scope

This policy applies to all technology equipment owned by Spec Chem.

##### Policy

* 1. Technology Equipment Disposal

1. When technology assets have reached the end of their useful li fe they should be sent to the local Information Technology office for proper disposal.
2. Information Technology will securely erase all storage mediums in accordance with current industry best practices.
3. Equipment which is working, but reached the end of its useful li fe to Spec Chem, will be made available for purchase by associates.
4. A lottery system will be used to determine who has the opportunity to purchase available equipment.
5. All equipment purchases must go through the lottery process. Associates cannot purchase their office computer directly or “reserve” a system. This ensures that all associates have an equal chance of obtaining equipment.
6. Finance and Information Technology will determine an appropriate cost for each item.
7. All purchases are final. No warranty or support will be provided with any equipment sold.
8. Any equipment not in working order or remaining from the lottery process will be donated or disposed of according to current environmental guidelines. Information Technology has contracted with several organizations to donate or properly dispose of outdated technology assets.
9. Prior to leaving Spec Chem premises, all equipment must be removed from the Information Technology inventory system.

##### SpecChem Ramifications

Failure to properly dispose of technology equipment can have several negative ramifications to the Spec Chem including f ines, negative customer perception and costs to notify constituents of data loss or inadvertent disclosure.

##### Enforcement

Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

# Personal Communication Devices and Voicemail Policy

##### Purpose

This document describes Information Security's requirements for Personal Communication Devices and Voicemail for Spec Chem.

##### Scope

This policy applies to any use of Personal Communication Devices and Spec Chem Voicemail issued by Spec Chem or used for Spec Chem business.

##### Policy

* 1. Issuing Policy

Personal Communication Devices (PCDs) will be issued only to Spec Chem personnel with duties that require them to be in immediate and frequent contact when they are away from their normal work locations. For the purpose of this policy, PCDs are defined to include handheld wireless devices, cellular telephones, laptop wireless cards and pagers. Effective distribution of the various technological devices must be limited to persons for whom the productivity gained is appropriate in relation to the costs incurred.

Each associate who has a cellular telephone will be allowed approximately .5 gb of cellular data per month. Associates that go over this amount will be charged for the usage.

Handheld wireless devices may be issued, for operational efficiency, to Spec Chem personnel who need to conduct immediate, critical Spec Chem business. These individuals generally are at the executive, management and sales level. In addition to verbal contact, i t is necessary that they have the capability to review and have documented responses to critical issues.

##### Bluetooth

Hands- free enabling devices, such as the Bluetooth, may be issued to authorized Spec Chem personnel who have received approval. Care must be taken to avoid being recorded when pairing Bluetooth adapters; Bluetooth 2 .0 Class 1 devices have a range of 330 feet.

##### Voicemail

Voicemail boxes may be issued to Spec Chem personnel who require a method for others to leave messages when they are not available. Voicemail boxes must be

protected by a PIN which must never be the same as the last four digits of the telephone number of the voicemail box.

##### Loss and Theft

Files containing confidential or sensitive data may not be stored in PCDs unless protected by approved encryption. Confidential or sensitive data shall never be stored on a personal PCD. Charges for repair due to misuse of equipment or misuse of services may be the responsibility of the associate, as determined on a case- by- case basis. The cost of any item beyond the standard authorized equipment is also the responsibility of the associate. Lost or stolen equipment must immediately be reported.

##### Personal Use

PCDs and voicemail are issued for Spec Chem business. Personal use should be limited to minimal and incidental use.

##### PCD Safety

Conducting telephone calls or utilizing PCDs while driving can be a safety hazard. Drivers should use PCDs while parked or out of the vehicle. I f associate’s must use a PCD while driving, Spec Chem requires the use of hands-free enabling devices.

##### Enforcement

Any associatefound to have violated this policy may be subject to disciplinary action that leads to being ineligible for continued use of PCDs. Extreme cases could lead to additional discipline, up to and including termination of employment.

##### Definitions

Term Definition

Bluetooth Bluetooth is an industrial specification for wireless personal area networks (PANs), also known as IEEE 802.15.1. Bluetooth provides a way to connect and exchange information between devices such as personal digital assistants (PDAs), and mobile phones via a secure, globally unlicensed short-range radio frequency. Source: Wikipedia

**Confidential or sensitive data** All data that is not approved for public release shall be considered confidential or sensitive.

# Workstation Security Policy

##### Purpose

The purpose of this policy is to provide guidance for workstation security for SpecChem workstations in order to ensure the security of information on the workstation and information the workstation may have access to.

##### Scope

This policy applies to all SpecChem associates, contractors, workforce members, vendors, and agents with a SpecChem-owned or personal-workstation connected to the SpecChem network.

##### Policy

Appropriate measures must be taken when using workstations to ensure the confidentiality, integrity and availability of sensitive information and that access to sensitive information is restricted to authorized users.

##### Data Security

Workforce members using workstations shall consider the sensitivity of the information that may be accessed and minimize the possibility of unauthorized access.

* 1. Physical Security

SpecChem will implement physical and technical safeguards for all workstations that access electronic protected health information to restrict access to authorized users.

##### Workstation Utilization

* + - Restricting physical access to workstations to only authorized personnel.
    - Securing workstations (screen lock or logout) prior to leaving area to prevent unauthorized access.
    - Enabling a password-protected screen saver with a short timeout period to ensure that workstations that were left unsecured will be protected
    - Complying with all applicable password policies and procedures.
    - Ensuring workstations are used for authorized business purposes only.
    - Never installing unauthorized software on workstations.
    - Storing all sensitive information, including protected health information (PHI) on network servers
    - Keeping food and drink away from workstations in order to avoid accidental spills.
    - Securing laptops that contain sensitive information by using cable locks or locking laptops up in drawers or cabinets.
    - Complying with the Portable Workstation Encryption policy
    - Complying with the Anti-Virus policy
    - Ensuring that monitors are positioned away from public view. If necessary, install privacy screen filters or other physical barriers to public viewing.
    - Ensuring workstations are left on but logged off in order to facilitate after- hours updates. Exit running applications and close open documents
    - Ensuring that all workstations use a surge protector ( not just a power strip) or a UPS (battery backup).
    - If wireless network access is used, ensure access is secure by following the Wireless Access policy

##### Enforcement

Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

##### Definitions

Term Definition

*Workstations* Laptops, desktops, PDAs, computer based medical equipment

containing or accessing patient information and authorized home workstations accessing the SpecChem network.

*Workforce Members* Associates, volunteers, trainees, and other persons under the direct

control of SpecChem.

# Acceptable Use Policy

##### Overview

Spec Chem’s intentions for publishing an Acceptable Use Policy are not to impose

restrictions that are contrary to Spec Chem’s established culture of openness, trust and integrity. Spec Chem is committed to protecting Spec Chem's associates,

partners and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

Internet/Intranet/Extranet-related systems, including but not l imited to computer equipment, software, operating systems, storage media, network accounts

providing electronic mail, WWW browsing, and FTP, are the property of Spec Chem.

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. Please review Human Resources policies for further details.

Effective security is a team effort involving the participation and support of every Spec Chem associate 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.

##### Purpose

The purpose of this policy is to outline the acceptable use of computer equipment at Spec Chem. These rules are in place to protect the associate and Spec Chem.

Inappropriate use exposes Spec Chem to risks including virus attacks, compromise of network systems and services, and legal issues.

##### Scope

This policy applies to associates, contractors, consultants, temporaries, and other workers at Spec Chem, including all personnel affiliated with third parties. This

policy applies to all equipment that is owned or leased by Spec Chem.

##### Policy

* 1. General Use and Ownership

While Spec Chem's network administration 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 Spec Chem. Because of the need to protect Spec Chem's

network, management cannot guarantee the confidentiality of information stored on any network device belonging to Spec Chem.

* + 1. Associates 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, associates should be guided by departmental policies on personal use, and if there is any uncertainty, associates should consult their supervisor or manager.

* + 1. Spec Chem recommends that any information that users consider sensitive or vulnerable be encrypted.
    2. For security and network maintenance purposes, authorized individuals within Spec Chem may monitor equipment, systems, and network traffic at any time.
    3. Spec Chem reserves the right to audit networks and systems on a periodic basis to ensure compliance with this policy.

##### Security and Proprietary Information

* + 1. The user interface for information contained on Internet/Intranet/Extranet- related systems should be classified as either confidential or not confidential. Examples of confidential information include but are not l imited to: company private, corporate strategies, competitor sensitive, trade secrets, specifications, customer lists, and research data. Associates should take all necessary steps to prevent unauthorized access to this information.
    2. Keep passwords secure and do not share accounts. Authorized users are responsible for the security of their passwords and accounts. System level passwords should be changed quarterly, user level passwords should be changed every six months.
    3. All PCs, laptops and workstations should be secured with a password- protected screensaver with the automatic activation feature set at 10 minutes or less, or by logging-off (control-alt- delete for Win2K users) when the host will be unattended.
    4. Because information contained on portable computers is especially vulnerable, special care should be exercised.
    5. Postings by associates from a Spec Chem email address to newsgroups should contain a disclaimer stating that the opinions expressed are strictly their own and not necessarily those of Spec Chem, unless posting is in the course of business duties.
    6. All hosts used by the associate that are connected to the Spec Chem Internet/Intranet/Extranet, whether owned by the associate or Spec Chem, shall be continually executing approved virus-scanning software with a current virus database unless overridden by departmental or group policy.
    7. Associates must use extreme caution when opening e-mail attachments received from unknown senders, which may contain viruses, e-mail bombs, or Trojan horse code.

##### 4.3 . Unacceptable Use

The following activities are, in general, prohibited. Associates may be exempted from these restrictions during the course of their legitimate job responsibilities

(e.g., systems administration staff may have a need to disable the network access of a host if that host is disrupting production services).

Under no circumstances is an associate of Spec Chem authorized to engage in any activity that is illegal under local, state, federal or international law while

utilizing Spec Chem-owned resources.

The lists below are by no means exhaustive, but attempt to provide a framework for activities which fall into the category of unacceptable use.

System and Network Activities

The following activities are strictly prohibited, with no exceptions:

1. Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations, including, but not limited to, the installation or distribution of "pirated" or other software products that are not appropriately licensed for use by Spec Chem.
2. Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which Spec Chem or the end user does not have an active license is strictly prohibited.
3. Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws, is illegal. The appropriate management should be consulted prior to export of any material that is in question.
4. Introduction of malicious programs into the network or server (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.).
5. Revealing your account password to others or allowing use of your account by others. This includes family and other household members when work is being done at home.
6. Using a Spec Chem computing asset to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws in the user's local jurisdiction.
7. Making fraudulent offers of products, items, or services originating from any Spec Chem account.
8. Making statements about warranty, expressly or implied, unless it is a part of normal job duties.
9. Effecting security breaches or disruptions of network communication. Security breaches include, but are not limited to, accessing data of which the associate is not an intended recipient or logging into a server or account that the associate is not expressly authorized to access, unless these duties are within the scope of regular duties. For purposes of this section, " disruption" includes, but is not limited to, network sniffing, pinged floods, packet spoofing, denial of service, and forged routing information for malicious purposes.
10. Port scanning or security scanning is expressly prohibited unless prior notification to Spec Chem is made.
11. Executing any form of network monitoring which will intercept data not intended for the associate's host, unless this activity is a part of the associate's normal job/ duty.
12. Circumventing user authentication or security of any host, network or account.
13. Interfering with or denying service to any user other than the associate's host (for example, denial of service attack).
14. Using any program/script/command, or sending messages of any kind, with the intent to interfere with, or disable, a user's terminal session, via any means, locally or via the Internet/Intranet/Extranet.
15. Providing information about, or l ists of, Spec Chem associates to parties outside Spec Chem.

##### Email and Communications Activities

1. Sending unsolicited email messages, including the sending of " junk mail" or other advertising material to individuals who did not specifically request such material (email spam).
2. Any form of harassment via email or telephone, whether through language, frequency, or size of messages.
3. Unauthorized use, or forging, of email header information.
4. Solicitation of email for any other email address, other than that of the poster's account, with the intent to harass or to collect replies.
5. Creating or forwarding "chain letters", "Ponzi" or other "pyramid" schemes of any type.
6. Use of unsolicited email originating from within SpecChem' s networks of other Internet/ Intranet/ Extranet service providers on behalf of, or to advertise, any service hosted by Spec Chem or connected via Spec Chem's network.
7. Posting the same or similar non-business-related messages to large numbers of Usenet newsgroups (newsgroup spam).

##### 4.4 . Blogging

1. Blogging by associates, whether using Spec Chem’s property and systems or personal computer systems, is also subject to the terms and restrictions set forth in this Policy. Limited and occasional use of Spec Chem’ s systems to engage in blogging is acceptable, provided that i t is done in a professional and responsible manner, does not otherwise violate Spec Chem’s policy, is not detrimental to Spec Chem’s best interests, and does not interfere with an associate's regular work duties. Blogging from Spec Chem’s systems is also subject to monitoring.
2. Spec Chem’s Confidential Information policy also applies to blogging. As such, Associates are prohibited from revealing any Spec Chem confidential or proprietary information, trade secrets or any other material covered by Spec Chem’s Confidential Information policy when engaged in blogging.
3. Associates shall not engage in any blogging that may harm or tarnish the image, reputation and/or goodwill of Spec Chem and/or any of its associates.

Associates are also prohibited from making any discriminatory, disparaging, defamatory or harassing comments when blogging or otherwise engaging in any conduct prohibited by Spec Chem’s Non-Discrimination and Anti- Harassment policy.

1. Associates may also not attribute personal statements, opinions, or beliefs to Spec Chem when engaged in blogging. I f an associate is expressing his or her beliefs and/or opinions in blogs, the associate may not, expressly or implicitly, represent themselves as an associate or representative of Spec Chem. Associates assume any and all risk associated with blogging.
2. Apart from following all laws pertaining to the handling and disclosure of copyrighted or export controlled materials, SpecChem’s trademarks, logos and any other Spec Chem intellectual property may also not be used in connection with any blogging activity

##### Enforcement

Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

##### Definitions

Term Definition

*Blogging* Writing a blog. A blog (short for weblog) is a personal online journal that is frequently updated and intended for general public consumption.

*Spam* Unauthorized and/or unsolicited electronic mass mailings.

# Server Audit Policy

##### 1.0 Purpose

The purpose of this policy is to ensure all servers deployed at SpecChem are configured according to the SpecChem security policies. Servers deployed at SpecChem shall be audited at least annually and as prescribed by applicable regulatory compliance.

Audits may be conducted to:

* Ensure integrity, confidentiality and availability of information and resources
* Ensure conformance to SpecChem security policies

##### Scope

This policy covers all servers owned or operated by SpecChem. This policy also covers any server present on SpecChem premises, but which may not be owned or operated by SpecChem.

##### Policy

SpecChem hereby provides its consent to allow Fore! Technologies to access its servers to the extent necessary to allow Fore! Technologies to perform scheduled and ad hoc audits of all servers at SpecChem.

##### Specific Concerns

Servers in use for SpecChem support critical business functions and store company sensitive information. Improper configuration of servers could lead to the loss of confidentiality, availability or integrity of these systems.

##### Guidelines

Approved and standard configuration templates shall be used when deploying server systems to include:

* + - All system logs shall be sent to a central log review system
    - All Administrator actions must be logged
    - Use a central patch deployment system
    - Host security agent such as antivirus shall be installed and updated
    - Network scan to verify only required network ports and network shares are in use
    - Verify administrative group membership
    - Conduct baselines when systems are deployed and upon significant system changes
    - Changes to configuration template shall be coordinated with approval of change control board

##### 3.2 Responsibility

Fore! Technologies shall conduct audits of all servers owned or operated by SpecChem. Server and application owners are encouraged to also perform this work as needed.

##### 3.4 Relevant Findings

All relevant findings discovered as a result of the audit shall be listed in the SpecChem tracking system to ensure prompt resolution or appropriate mitigating controls.

##### 3.4 Ownership of Audit Report

All results and findings generated by the Fore! Technologies team must be provided to appropriate SpecChem management within one week of project completion. This report will become the property of SpecChem and be considered company confidential.

##### Enforcement

Fore! Technologies shall never use access required to perform server audits for any other purpose. Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

# Email Use Policy

##### Purpose

To prevent tarnishing the public image of SpecChem When email goes out from SpecChem the general public will tend to view that message as an official policy statement from the SpecChem.

##### Scope

This policy covers appropriate use of any email sent from a SpecChem email address and applies to all associates, vendors, and agents operating on behalf of SpecChem.

##### Policy

* 1. Prohibited Use

The SpecChem email system shall not to be used for the creation or distribution of any disruptive or offensive messages, including offensive comments about race, gender, hair color, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. Associates who receive any emails with this content from any SpecChem associate should report the matter to their supervisor immediately.

##### Personal Use

Using a reasonable amount of SpecChem resources for personal emails is acceptable, but non-work related email shall be saved in a separate folder from work related email. Sending chain letters or joke emails from a SpecChem email account is prohibited. Virus or other malware warnings and mass mailings from SpecChem shall be approved by SpecChem administration before sending. These restrictions also apply to the forwarding of mail received by a SpecChem associate.

##### Monitoring

SpecChem associates shall have no expectation of privacy in anything they store, send or receive on the company’s email system. SpecChem may monitor messages without prior notice. SpecChem is not obliged to monitor email messages.

##### Enforcement

Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

##### Definitions

Term Definition

*Email* The electronic transmission of information through a mail protocol such as SMTP or IMAP. Typical email clients include Eudora and Microsoft Outlook.

*Forwarded email* Email resent from an internal network to an outside point.

*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.

*Sensitive information* Information is considered sensitive if it can be damaging to SpecChem

or its customers' reputation or market standing.

*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.

*Unauthorized Disclosure* The intentional or unintentional revealing of restricted information to

people, both inside and outside SpecChem, who do not have a need to know that information.

# Associate Internet Use Monitoring and Filtering Policy

##### Purpose

The purpose of this policy is to define standards for systems that monitor and limit web use from any host within SpecChem's network. These standards are designed to ensure associates use the Internet in a safe and responsible manner, and ensure that associate web use can be monitored or researched during an incident.

##### Scope

This policy applies to all SpecChem associates, contractors, vendors and agents with a SpecChem- owned or personally-owned computer or workstation connected to the SpecChem network.

This policy applies to all end user initiated communications between SpecChem’s network and the Internet, including web browsing, instant messaging, file transfer, file sharing, and other standard and proprietary protocols. Server to Server communications, such as SMTP traffic, backups, automated data transfers or database communications are excluded from this policy.

##### Policy

* 1. Web Site Monitoring

The Information Technology Department shall monitor Internet use from all computers and devices connected to the corporate network. For all traffic the monitoring system must record the source IP Address, the date, the time, the protocol, and the destination site or server. Where possible, the system should record the User ID of the person or account initiating the traffic. Internet Use records must be preserved for 180 days.

##### Access to Web Site Monitoring Reports

General trending and activity reports will be made available to any associate as needed upon request to the Information Technology Department. Computer Security Incident Response Team (CSIRT) members may access all reports and data if necessary to respond to a security incident. Internet Use reports that identify specific users, sites, teams, or devices will only be made available to associates outside the CSIRT upon written or email request to Information Systems from administration.

##### Internet Use Filtering System

The Information Technology Department shall block access to Internet websites and protocols that are deemed inappropriate for SpecChem’s corporate environment. The following protocols and categories of websites should be blocked:

* + - Adult/Sexually Explicit Material
    - Advertisements & Pop-Ups
    - Chat and Instant Messaging
    - Gambling
    - Hacking
    - Illegal Drugs
    - Intimate Apparel and Swimwear
    - Peer to Peer File Sharing
    - Personals and Dating
    - Social Network Services
    - SPAM, Phishing and Fraud
    - Spyware
    - Tasteless and Offensive Content
    - Violence, Intolerance and Hate
    - Web Based Email

##### Internet Use Filtering Rule Changes

The Information Technology Department shall periodically review and recommend changes to web and protocol filtering rules. Human Resources shall review these recommendations and decide if any changes are to be made. Changes to web and protocol filtering rules will be recorded in the Internet Use Monitoring and Filtering Policy.

##### Internet Use Filtering Exceptions

If a site is mis-categorized, associates may request the site be un-blocked by submitting a ticket to the Information Technology help desk. An IT associate will review the request and un-block the site if it is mis-categorized.

Associates may access blocked sites with permission if appropriate and necessary for business purposes. If an associate needs access to a site that is blocked and appropriately categorized, they must submit a request to their Human Resources representative. HR will present all approved exception requests to Information Technology in writing or by email. Information Technology will unblock that site or category for that associate only. Information Technology will track approved exceptions and report on them upon request.

##### Enforcement

The IT Security Officer will periodically review Internet use monitoring and filtering systems and processes to ensure they are in compliance with this policy. Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

##### Definitions

Term Definition

*Internet Filtering* Using technology that monitors each instance of communication

between devices on the corporate network and the Internet and blocks traffic that matches specific rules.

*User ID* User Name or other identifier used when an associate logs into the corporate network.

*IP Address* Unique network address assigned to each device to allow it to communicate with other devices on the network or Internet.

*SMTP* Simple Mail Transfer Protocol. The Internet Protocol that facilitates the exchange of mail messages between Internet mail servers.

*Peer-to-Peer File Sharing* Services or protocols such as BitTorrent and Kazaa that allow Internet

connected hosts to make files available to or download files from other hosts.

*Social Networking Services* Internet sites such as Myspace and Facebook that allow users to post

content, chat, and interact in online communities.

*SPAM* Unsolicited Internet Email. SPAM sites are websites link to from unsolicited Internet mail messages.

*Phishing* Attempting to fraudulently acquire sensitive information by masquerading as a trusted entity in an electronic communication.

*Hacking* Sites that provide content about breaking or subverting computer security controls.

## Code of Business Ethics and Employment Conduct for SpecChem

1. SpecChem intends to act with the highest degree of integrity and honesty, to comply with all applicable federal, state, and local laws and

regulations, and to otherwise fully comply with all of their government contracts.

1. This Code of Business Ethics and Associate Conduct is binding upon every director, officer, and associate of SpecChem, and every director, officer, and associate is expected to take whatever action may be necessary to

implement and follow its provisions in all respects.

1. All officers, directors, and associates of SpecChem are expected to

conduct themselves in accordance with all applicable laws, regulations, and basic tenets of business integrity and honesty in their business

dealings on behalf of SpecChem.

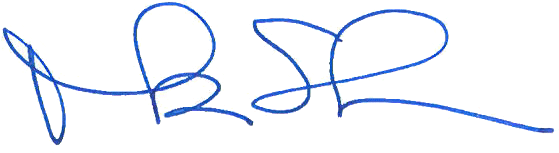
1. SpecChem will take appropriate disciplinary action against any director, officer, or associate whose conduct violates any applicable laws,

regulations, or basic tenets of business integrity and honesty.

1. Any director, officer or associate of Spec Chem who has any knowledge of any violation of law, regulations, or Government procurement guidelines committed by an associate of SpecChem, or an associate of the

government must report such violation to the quality assurance auditor for SpecChem, whose name, address, and telephone number will be

posted under the title of QAA.



Mike Shull President SpecChem

## Code of Ethics and Associate Conduct Receipt Form

I certify that I have received a copy of the SpecChem Code of Business Ethics and Associate Conduct. I further agree to abide by statements and policies

contained therein.

Associate/ Agent Date

## Associate Handbook

Acknowledgement and Receipt Form

The policies set forth in this handbook may be changed by Spec Chem at any time, for any reason, with or without notice to associates. This handbook supersedes any

previous company policy statements. Nothing in this handbook is intended to constitute an employment contract; all associates are employed at the will of Spec Chem. Nothing in this handbook is intended to create an employment

relationship of any definite duration, nor shall anything in this handbook be

interpreted as a waiver by Spec Chem of its rights to terminate any associate at any time, with or without cause or notice. No person other than the President of

SpecChem has the authority to make representations to the contrary.

I certify that I have received a copy of the SpecChem Associate Handbook. I further acknowledge that I have read the information it contains, will ask questions i f I do

not understand any of the information and agree to abide by statements and policies contained therein, including future changes or additions to the Handbook.

Associate Date

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( Detach and place in Personnel Fi le) HANDBOOK RECEIPT FORM

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I certify that I have received a copy of the SpecChem Associate Handbook. I further acknowledge that I have read the information it contains, will ask questions i f I do

not understand any of the information and agree to abide by statements and policies contained therein, including future changes or additions to the Handbook.

Associate Date

Associate Uniform Policy

After a minimum of 60 days of employment, Spec Chem associates are eligible for

uniforms. Spec Chem has a national standardized uniform and service agreement that covers all locations across the country. Each site maintains a local

driver/ representative.

Each associate will be allotted the following clothing to be used for work:

**( 11) shirts**

**( 11) pants**

**( 2) jackets**

In addition to uniforms, Associates will be assigned the **required PPE ( Personal**

**Protection Equipment)** to perform essential functions of their job. These may include a respirator, facial protection, glasses, and gloves. Respirators are to be used and

kept at the facility where work is performed.

The shirts may be a variety of long and short-sleeved versions but will total no more than eleven ( 11 ) units combined. The pants may also be a variety of long pants and

shorts but will total no more than eleven ( 11 ) units combined. Plant Managers will inform associates of any plant- specific requirements.

Eligible associates will be allowed two ( 2 ) jackets which, during the summer months, will be turned in during periods of non- use. The site plant managers will coordinate this effort with the associates and their local driver representative.

**Associate responsibilities:**

* Wear uniform and PPE during work hours to maintain a professional, organized, and safe work environment.
* Promptly communicate with site plant manager regarding any issues with uniform damage or delivery service.
* Keep track of entire uniform inventory.
* Associates have an obligation to turn in all uniform pieces to the plant manager should employment cease with SpecChem.

**Important to note:**

Failure to turn in all uniforms and PPE upon separation of employment will result in payroll deductions from the associate’ s final paycheck to cover replacement costs. Charges will be consistent with that of current uniform company piece rates.

**Print Associate Name Associate Signature and Date**

Cell Phone, Radio, & Headphone Policy Receipt & Acknowledgement

For the safety, productivity, and professionalism of all Spec Chem Plant locations:

Production Associates may use cell phones during breaks in break rooms. Production Associates are not to use cell phones on the production floor.

Managers and Assistant Managers should carry their company phones at all

times. Cell phones can stay in an associate's vehicle, in the Manager’ s office, in a locker, or in the Plant’s Break Room. For emergencies, all associates will be given both managers’ numbers and the number to the plant’s office.

Music in each department is limited to one stationary AM/FM radio. Radios will maintain professional volume and content, both determined by

management’ s discretion. Additionally, headphones will not be used in any capacity on the production floor.

Print Associate Name Associate Signature and Date

Zero Tolerance Policy

Acknowledgement and Receipt Form

I acknowledge that I have received, read, and understand the Zero Tolerance policy of SpecChem as outlined in the involuntary termination section of the Handbook. I understand that failure to comply with the policy could result in disciplinary action up to and including termination of employment.

Associate Date