

EMPLOYEE HANDBOOK & HEALTH AND SAFETY MANUAL

Last updated: April 2014



South • Southeast • Midwest • West • Northeast

Eklund's, Inc. | 2860 Market Loop, Southlake, Texas 76092 | p 817.949.2030 | f 817.488.9158

www eklunds.com

EMPLOYEE HANDBOOK	5
ABOUT EKLUND'S, INC. / BCE SPECIALTIES, INC.	6
Description	6
Mission Statement	6
Facilities and Locations	6
History	6
Organization Linkage	7
Beliefs/Vision and Tenets/Conduct	7
Beliefs/Vision for Eklund's/BCE Specialties, Inc.:	7
Tenets/Conduct:	7
POLICIES FOR EMPLOYMENT	8
Introduction, Disclaimers, Employment at Will Statement	8
Equal Employment Opportunity	8
Labor Laws	8
Orientation Period	8
Drug Free Work Environment	9
Impairment Prohibited	9
Possession Prohibited	9
Drug/Alcohol Testing	9
Inspections	10
Privacy	10
Disabilities	10
Rules of Conduct	10
Harassment	11
Business Ethics, Conflicts of Interest and Confidential Information	13
Computer and Internet Usage	13
Introduction – Computers	13
Personal Use	14
Access	14
Unacceptable Use	14
Best Practice Guidelines	14
Drafting Emails	14
Replying to Emails	15
E-mail Signatures	15
Disclaimer	15
Absence	15
Newsletters and News Groups	16
General Maintenance	16
Retention	16
Monitoring	16
Introduction – Internet	16
Personal Use	17
Access	17
Unacceptable Use	17
Download of Files and Software	17
Monitoring	17
Miscellaneous	18
Personal Auto Insurance Requirements	18
Frequent and Infrequent Drivers: Requirement for Employment for assigned role description	18
Proof of Coverage	18
Discipline	18
GENERAL OFFICE AND WORKING CONDITIONS	19
Work Hours	19
Inclement Weather	19
Telephone Usage	19
Personal Appearance and Uniforms	20
Equipment, Materials, Supplies and Tools	20
Out of Town Travel on Company Business	20
Credit Card Usage	21
Motor Vehicle Safety Policy	21
Purpose	21
Driver License Requirements Associated with Provision of Company Vehicle or Auto Allowance	21
Valid Driver's License Requirement	21
Compliance with Traffic Laws	22

<i>Use of Seat Belts</i>	22
<i>Prohibition Against Driving While Impaired</i>	22
<i>Discouragement of Cell Phone Use</i>	22
<i>Additional Circumstances Resulting in Prohibition of Driving for Company Business</i>	22
<i>Policy for Use of Company Owned Vehicle</i>	23
<i>Use of Personal Vehicles</i>	23
Tobacco Usage	23
PAYROLL	24
Pay Period, Pay Day, Time Keeping and Termination	24
Rates of Pay (Overtime)	24
Payroll Advances and Employee Loans	24
Return to Work Process	24
PERFORMANCE REVIEW	25
About Performance Reviews	25
WORKER'S COMPENSATION INSURANCE	26
Benefits	26
<i>Medical Care</i>	26
<i>Payment for Lost Wages</i>	26
<i>Accident Reports and Postings</i>	26
EMPLOYEE BENEFITS	27
Group Insurance	27
Personal Days Off and Application for Leave	27
Health and Wellness Program	27
Recognized Holidays	28
Other Leaves	28
<i>General Leave of Absence</i>	28
<i>Military Leave</i>	28
<i>Death in the Family</i>	28
<i>Jury Duty</i>	28
401(k) Retirement Savings Plan	29
Tuition Reimbursement	29
EKLUND'S HEATH AND SAFETY MANUAL	30
HEALTH AND SAFETY INTRODUCTION	31
HEALTH AND SAFETY POLICIES AND RESPONSIBILITIES	32
Health and Safety Policy Statement	32
Safety Responsibilities and Authority	32
<i>Occupational Safety and Health Act (OSHA) Compliance Officers</i>	32
<i>Safety Director</i>	33
<i>Office Safety Coordinator</i>	33
<i>Management and Supervisors</i>	33
<i>Employees</i>	33
HEALTH AND SAFETY COMMUNICATION	35
Safety Training	35
<i>General Safety Training</i>	35
<i>Specific Safety Training</i>	35
<i>Client or Contractor Safety Training</i>	36
Hazardous Materials Communications	36
<i>Hazardous Materials Safety Manual</i>	36
<i>Material Safety Data Sheets (MSDS)</i>	36
<i>MSDS Medical Use</i>	36
Progressive Safety Discipline	37
<i>General Safety Violations</i>	37
<i>Life Threatening Safety Violations</i>	37
Employee Safety Suggestions and Safety Committee	37
Keeping Employees Informed	38
<i>Required Postings</i>	38
<i>Examining Medical Records</i>	38
EMERGENCY PREPAREDNESS	39
Emergency Action Plan	39
<i>Emergency Evacuation of Premises</i>	39
WORKPLACE ACCIDENTS	40
Unsafe Acts	40
Unsafe Conditions	40
Accident Response and Reporting	40
<i>Near Miss Investigations</i>	41

First Aid	41
Workers Compensation	41
Medical Care.....	41
Payment for Lost Wages	41
Accident Reports and Postings	42
SAFETY RULES AND STANDARDS FOR ALL EMPLOYEES	43
Access to Medical and Exposure Records	43
Accident Record Keeping Requirements	43
Electrical.....	43
Ergonomics.....	43
Eye and Face Protection	43
Fire Protection and Evacuation Plan	44
Fit To Work	44
Flammable and Combustible Liquids	44
General Duty Clause.....	44
General Requirements	44
Horseplay	44
Housekeeping	44
Lifting.....	45
Medical Services and First Aid.....	45
Personal Protective Equipment.....	45
Safety Expectations.....	45
Signs.....	45
SAFETY RULES AND STANDARDS FOR CONSTRUCTION AND FIELD PERSONNEL	46
Awareness.....	46
Clothing	46
Confined Spaces	46
Confined Space Entry.....	46
Drinking Water	47
Hand Tools	47
Head Protection	47
Hearing Protection.....	47
Fall Protection.....	48
Slips, Trips, and Falls.....	48
Vehicle Safety	48
Washing Facilities	48
Lockout/Tagout.....	49
Respirator Protection	49
FORMS	50
EMPLOYEE HANDBOOK ACKNOWLEDGMENT FORM (EMPLOYER COPY)	51
EMPLOYEE HANDBOOK ACKNOWLEDGMENT FORM (EMPLOYEE COPY).....	52
EKLUND'S, INC. TUITION REIMBURSEMENT APPLICATION – PAGE 1	53
EKLUND'S, INC. TUITION REIMBURSEMENT APPLICATION – PAGE 2	544

EMPLOYEE HANDBOOK

Description

Eklund's crafts complete elevator cabs and custom elevator interiors. Our total elevator cab solutions include design, manufacturing, and installation of luxury, custom-crafted cabs and interiors, and a wide selection of customizable standard cab interiors. Installation is offered nationwide by our certified WBE installation partner, BCE Specialties

Mission Statement

Modern organizations and businesses need safe and aesthetically pleasing conveyance systems for people which radiate a sense of welcome, comfort, and security. Eklund's/BCE Specialties meets this need by providing complete architectural solutions through the design, manufacture, and installation of elevator and escalator products.

Facilities and Locations

Eklund's corporate headquarters and manufacturing facility:

- SOUTH - Southlake, Texas (2860 Market Loop)

Eklund's second manufacturing facility:

- NORTHEAST - Lanham, Maryland (9950 Business Parkway, Suite 100)

Other branch offices locations:

- SOUTHEAST - Houston, Texas (5201 Mitchelldale, Suite B-3)
- MIDWEST - Chicago, Illinois (4114 N. Nashville Ave.)
- WEST - Las Vegas, Nevada (6625 S. Valley View Blvd; Suite 100)

Showroom/BCE Specialties Headquarters

- Coppell, Texas (989 W. Sandy Lake Road)

History

Eklund's, Inc. was founded as a small shop in Grapevine, Texas by James (Jim) B. Eklund in 1983. Prior to founding Eklund's, Jim had spent his entire adult business career in the elevator cab and entrance business. His vision for Eklund's was to create a company whose top priority was, and still is today, customer service and satisfaction. Specialty elevator cabs were among the first orders for business, proving to be the beginning of Eklund's market niche in the elevator industry.

In 1983, Eklund's became incorporated and Bradley Eklund, Jim's son, became Vice President of Production. Beth Cunningham, Jim's daughter, joined the growing company as President in 1984. Beth also founded BCE Specialties, Eklund's installation partner.

Eklund's founder, Jim, retired from Eklund's in 2001 at age 65. Soon after, Brad departed from the family business to pursue his own life-long interests.

Jim passed away in December of 2012 at the age of 76. One of the pioneers in the elevator cab specialty trade, Jim Eklund's professional legacy lives on here at Eklund's.

Still family-owned and operated today, Beth Cunningham remains President. Jim's two grandsons, Heath Cunningham and Joseph Eklund, also have management positions within the company.

Since being founded in 1983, Eklund's has experienced continued growth in customer base, sales dollars, employees, manufacturing capacity, and service capabilities. Based in the South (Dallas/Fort Worth), additional sales offices and design showrooms are located in the Southeast (Houston, 1992), Midwest (Chicago, 1994), West (Las Vegas, 2008), and Northeast (Baltimore/Washington, 2011). Manufacturing facilities are located at our South and Northeast offices.

Organization Linkage

All work within the company is a series of connected processes which, as a whole, result in the corporate system as illustrated through our Linkage diagram. Eklund's/BCE Specialties uses Process Improvement through Charters and Plan-Do-Study-Act Cycles (PDSAs). More often than not, a Standard Operating Procedure (SOP) or an improvement to an existing SOP will complete the Charter process. A SOP is written to solidify the process defined/re-defined during the Charter. The SOP's main objective is to explicitly define the process through steps, operational definitions, and responsible parties within each step. Improving processes is a perpetual cycle driven by areas of concern decided by all stakeholders. Therefore, it is intended that SOP's are reviewed and modified as process improvement possibilities are identified.

Beliefs/Vision and Tenets/Conduct

Beliefs/Vision for Eklund's/BCE Specialties.:

By creating a skilled, trained workforce who believes in and reinforces constant improvement, Eklund's/BCE Specialties will address all market sectors relative to the need for architectural products for elevator cabs, entrances, and escalator cladding. Eklund's/BCE Specialties is recognized for its delivery of quality, integrity, communication, and integration of current technology to meet and exceed customer expectations.

Tenets/Conduct:

- Foster an environment of learning from mistakes so mistakes may become prospective improvements
- Encourage system feedback to all processes
- Understand market changes and the need to modify strategic focus
- Provide opportunities for all employees to be recognized for their participation in improving the system
- Stay cutting edge, using current technologies to increase value to the client
- Cultivate open forum culture where clients, employees, and vendors can speak openly within context of professionalism; all suggestions to be acknowledged
- Respect of all system stakeholders
- Expand our diversity to buffer market fluctuations
- Empower management to make decisions by using data to support their decisions
- Judicious use of resources
- **Integrity** – Foster Eklund's/BCE Specialties success while keeping high standards of values, principles, respect and beliefs, encourage others to do the same
- **Respect** – Respect the differences in personalities and skill set; treat clients, subordinates, peers, vendors as you wish to be treated at all times
- **Communication** – Openly share information that helps advance the success of Eklund's/BCE Specialties
- **Participation** – Active involvement in development and improvement of successful standard operating procedures which create a thriving system
- **Care** – Respect and care about others and their accomplishments
- **Enjoy** – Enjoy the interaction with those who you work with, make time to smile, and make others smile
- **Learn** – Voluntarily improve your knowledge and skills

Introduction, Disclaimers, Employment at Will Statement

This Employee Handbook has been prepared for Eklund's/BCE Specialties employees' use as members of the Eklund's/BCE Specialties team. The policies and procedures it contains shall supersede all previously issued policy and procedure written statements and established unwritten routines. From time to time the information in this handbook may become outdated or it may not be applicable anymore due to changes within Eklund's/BCE Specialties or changes in the law. When these situations occur, efforts will be made to issue revisions that shall be added to the handbook either as a supplement, replacement or addition.

Eklund's/BCE Specialties management hopes the information contained in this handbook will keep its employees better informed regarding the policies and procedures of Eklund's/BCE Specialties as well as answer their questions.

Comments, suggestions and questions regarding this handbook are encouraged as Eklund's/BCE Specialties tries to make it a usable tool for its employees. If an employee does not understand any aspect of this handbook, questions or comments should be addressed to the employee's immediate supervisor or the President.

The contents of this handbook are presented as a matter of information only. While Eklund's/BCE Specialties believes in the plans, policies and procedures described herein, they are not conditions of employment. Eklund's/BCE Specialties employs on an employment-at-will basis. In other words, employment may be terminated by Eklund's/BCE Specialties or the employee at any time without notice and without specific cause. Similarly, Eklund's/BCE Specialties reserves the right to modify, revoke, suspend, terminate, or change any or all such plans, policies, or procedures, in whole or in part, at any time, with or without notice. The language used in this handbook is not intended to create nor is it to be construed to constitute a contract between Eklund's/BCE Specialties and any one or all of its employees.

Equal Employment Opportunity

Eklund's/BCE Specialties is an equal opportunity employer. All applicants and employees shall be recruited, interviewed, selected, promoted and treated without unlawful discrimination based upon age, disability, race, religion, sex, color, creed, national origin or veteran's status. Eklund's/BCE Specialties also makes reasonable accommodations for disabled employees when such accommodations do not impose an undue hardship on Eklund's/BCE Specialties and can be provided without a substantial or imminent safety risk.

Labor Laws

Eklund's/BCE Specialties abides by all Federal and applicable State employment laws including but not limited to: Equal Employment Opportunity Law, Employee Polygraph Protection Act, Americans with Disabilities Act, National Labor Relations Act, Fair Labor Standards Act, Child Labor Law, Minimum Wage, Workers Compensation, Unemployment Compensation, Family and Medical Leave Act, as well as OSHA.

Orientation Period

All new employees are subject to a minimum orientation period of ninety (90) days. This time period allows Eklund's/BCE Specialties management to appraise the employee's performance including work habits and skill sets and make a decision as to continued employment. Upon successful completion of the orientation period, the probationary employee's status will be changed to that of a regular employee. At all times, including after successful completion of the orientation period, employment with Eklund's/BCE Specialties is considered at-will, and the employment relationship may be terminated at any time for any lawful reason by either party.

Drug Free Work Environment

Eklund's/BCE Specialties is committed to providing a safe, healthy and drug/alcohol free work environment for its employees.

Impairment Prohibited

No employee will report for work or will work impaired by any substance, drug or alcohol, lawful or unlawful, except with management's approval. Such approval will be limited to lawful medications and based strictly on an assessment of the employee's ability to perform his/her regular or other assigned duties safely and efficiently. "Impaired" means under the influence of a substance such that the employee's motor senses (i.e., sight, hearing, balance, reaction, reflex) or judgment either are or may be reasonably presumed to be affected. Any violation of this policy may result in discipline, up to and including termination of employment.

Possession Prohibited

No employee at any job site will possess any paraphernalia nor quantity of any substance, drug or alcohol, lawful or unlawful, which in sufficient quantity could result in impaired performance, except for authorized substances. "Job Site" means any office, building, or property (including parking lots) owned or operated by the employer, or any other site at which an employee is to perform work for the employer. "Possess" means to have either in or on an employee's person, personal effects, motor vehicle, tools, and areas substantially entrusted to the control of the employee such as desks, files, and lockers. Authorized substances include only (1) lawful over-the-counter drugs (excluding alcohol) in reasonable amounts; and (2) other lawful (prescription) drugs or alcohol, the possession of which management has been advised and approved in advance. Any violation of this policy may result in discipline, up to and including termination of employment.

Drug/Alcohol Testing

For purposes of assuring compliance with the above, both employees and applicants for employment may be subject to drug/alcohol testing under the circumstances described below. "Drug/Alcohol Testing" means testing of blood, urine, breath, saliva, or otherwise as reasonably deemed necessary to determine possession, impairment, or under the influence of drugs/alcohol condition.

Applicants: Prior to assuming any job, an applicant may be subject to drug/alcohol testing incident to a physical examination after receiving a conditional offer of employment. Refusal to submit to such screening will foreclose any further action on the applicant's employment.

Employees: The drug/alcohol testing of employees will be the determination of appropriate management personnel. Any such testing will be under the circumstances described below. Prior to the implementation of any such testing, classes of employees that will be subject to inclusion will be so notified.

Suspected Impairment: When there is reasonable evidence to suspect any employee has reported to work or is working impaired, he or she may be subject to drug/alcohol testing. Refusal to submit to such testing will be considered an act of insubordination, and is grounds for disciplinary action, including termination of employment. When a supervisor has a reasonable suspicion that can be articulated from personal observation, (appearance, behavior, speech, body odor, etc.), that an employee has reported to work or is working impaired, and the supervisor has been trained in the signs and symptoms of alcohol and drug influence, intoxication and misuse, the supervisor may make the observation and take appropriate action, including requiring the employee to submit to drug/alcohol testing.

Post Accident/Incident: Any employee involved in either a job-related accident or job-related incident involving the apparent violation of a safety rule or standard, which did or could have resulted in serious injury or property damage, may be subjected to drug/alcohol testing. This also applies to any accident or incident involving the use of a motor vehicle while on company business. Refusal to submit to such testing will be considered an act of insubordination, and is grounds for disciplinary action, including termination of employment.

Safety Critical Jobs: Employees holding safety critical jobs are subject to drug/alcohol testing at any time on a random or other nondiscriminatory basis, as a term and condition of holding such jobs. Only those jobs the performance of which requires a high degree of care and caution in execution that even minor impairment would constitute an imminent hazard will classify as "safety critical." Any refusal by an employee in a safety critical job to submit to drug/alcohol testing will be considered an act of insubordination, and is grounds for disciplinary action, including termination of employment.

Inspections

For purposes of assuring compliance with the prohibition of possession, employees may be subject to inspections of the kinds and under the circumstances described below. Any refusal to submit to such an inspection will be treated as an act of insubordination, and is grounds for disciplinary action, including termination of employment.

Without Cause: An employee's locker, closet, work area, desk, files, company motor vehicle, toolbox and similar areas are subject to inspection at any time on a random or any other nondiscriminatory basis for purposes of this policy. Similarly, an employee's own car, lunch box, toolbox and like personal containers are subject to such inspection when brought into any job site.

Privacy

The results of any drug/alcohol testing will be considered a medical report and will be in strict compliance with any State or Federal regulations regarding drug/alcohol testing results.

Disabilities

This policy will be administered so as not to interfere with the rights of disabled applicants and employees, except to the extent any substance abuse disability would directly interfere with job performance.

Rules of Conduct

Policies outlining the conduct standards for employees are necessary for the orderly operation of Eklund's/BCE Specialties and for the benefit and protection of all employees. This section will review general conduct expectations and highlight activities that are not acceptable. This is not intended to be all-inclusive, but is to serve as a guide.

It is the responsibility of each employee to conduct him/herself in a manner that will not reflect unfavorably on the employee or Eklund's/BCE Specialties both on and away from the job. The highest level of conduct is expected when interacting with customers, fellow employees or any other persons with whom contact is made while serving as a representative of Eklund's/BCE Specialties.

Because safety is such an important aspect of employment with Eklund's/BCE Specialties, a separate section of this handbook is dedicated entirely to safety. See Safety Policy.

The following list provides an understanding of unacceptable conduct that may result in disciplinary action, up to and including termination of employment. It is not possible to list every conceivable infraction, or to anticipate the circumstances under which an infraction might occur. Therefore, the list below is not intended to be all-inclusive. Incidents of misconduct not listed may arise. It will be the responsibility of Eklund's/BCE Specialties management to evaluate such incidents taking into account the circumstances and the employee's record before taking action. Prohibited conduct includes, but is not limited to, the following:

- Discrimination or harassment for reasons of sex, color, race, religion, national origin, age, disability or veteran's status.
- Using threatening or abusive language, intimidating, coercing or interfering with other employees in the performance of their jobs.
- Gambling on Eklund's/BCE Specialties property or job site. (With prior management approval, employees may participate in "low stakes" contests and games that facilitate employee camaraderie, such as football game pools.)
- Dishonesty, misrepresentation of facts or falsification of records (including, but not limited to, time keeping hours, employment application, drivers license and driving record, social security number, etc.) regardless of when the misrepresentation or falsification is made and/or discovered. (Eklund's/BCE Specialties reserves the right to verify any such information at any time, including pre-employment background searches.)
- Horseplay or pranks that may be dangerous to oneself and/or others.
- Fighting on Eklund's/BCE Specialties property or job site.
- Deliberate destruction or abuse of Eklund's/BCE Specialties property.
- Possession of firearms or other dangerous weapons on Eklund's/BCE Specialties property or job site.

- Stealing private or Eklund's/BCE Specialties property.
- Sleeping during paid working hours.
- Insubordination.
- Deliberate or willful violation of rules.
- Being under the influence of, in possession of, or use of any intoxicating beverage or illegal drugs on Eklund's/BCE Specialties property or job site. (See Drug Free Work Environment Policy.)
- Conviction of a crime.
- Acts that bring discredit to Eklund's/BCE Specialties.
- Excessive absenteeism or tardiness.

Any employee, who engages in any form of misconduct, whether listed above or not, is subject to discipline up to and including immediate termination of employment. Acts that are in violation of laws will be reported to the appropriate authorities. (See Discipline Policy.)

Harassment

It is the obligation of all officers, managers, supervisors and any employee of Eklund's/BCE Specialties to provide a work environment free from harassment.

Eklund's/BCE Specialties requires all of its employees to maintain a working environment free from harassment. Harassment, as defined below, is unacceptable and will not be tolerated. Any employee, regardless of their level within Eklund's/BCE Specialties, who harasses another employee, will be subject to disciplinary action, up to and including termination of employment.

Eklund's/BCE Specialties prohibits any conduct or language that is offensive and based upon the individual's race, color, religion, national origin, age, disability, or gender. Eklund's/BCE Specialties further prohibits conduct that has the effect or purpose of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassing conduct includes, but is not limited to, the following:

- Epithets, slurs, negative stereotyping, or threatening, intimidating, or hostile acts that relate to race, color, religion, national origin, age, disability or gender.
- Written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, national origin, age, disability or gender; and that is placed on walls, bulletin boards or elsewhere on Eklund's/BCE Specialties property, job site or premises, circulated or otherwise made visible in the workplace.
- An unwelcome sexual advance, a request for sexual favors, and/or other verbal or physical conduct of a sexual nature constitute sexual harassment when:
- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.
- Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior, which is not welcome, which is personally offensive, and which therefore interferes with work effectiveness. Because no absolute definition of sexual harassment exists, all employees are expected to comply both with the letter and spirit of this policy. If in doubt, contact a Vice President or the President.

The following procedures have been established:

- Any employee, who believes he or she may have been subjected to harassment because of his or her race, color, religion, national origin, age, disability, or gender, should immediately notify his or her supervisor, a Vice President or the President.
- After such a complaint is received, a thorough, prompt and impartial investigation will be conducted and

appropriate disciplinary or remedial action will be taken if the complaint is found to have merit.

- Eklund's/BCE Specialties policy prohibits retaliation against any employee who submits a complaint or otherwise participates in the investigation of a complaint.

Business Ethics, Conflicts of Interest and Confidential Information

This policy sets forth the high ethical standards that employees and all others representing Eklund's/BCE Specialties are to maintain while conducting the business of Eklund's/BCE Specialties. Generally, Eklund's/BCE Specialties expects its employees to conform to the highest legal, ethical and moral standards. There is both a company obligation and an individual obligation to fulfill the intent of this policy.

This policy statement does not attempt to cover all facets of unacceptable behavior; rather, it is intended to serve as a general guideline that will:

- Assure compliance with laws and regulations that govern Eklund's/BCE Specialties business activities;
- Foster a standard of conduct that reflects credit on Eklund's/BCE Specialties and its employees;
- Protect Eklund's/BCE Specialties from financial loss; and,
- Preserve a company atmosphere in which personal integrity and dignity are not compromised.

Eklund's/BCE Specialties expects all employees to have a general knowledge of this policy, to conduct themselves in a manner that supports the intent of this policy, and to avoid circumstances that would violate this policy. Any clear violation of applicable laws or deviation from the ethical business standards set forth in this policy is grounds for disciplinary action, including termination of employment. Circumstances that raise a concern with an employee should be discussed with the employee's supervisor, or with a Vice President or the President. All inquiries will be kept confidential if necessary.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level (Vice President and above) of management of Eklund's/BCE Specialties. Business dealings with outside firms should not result in "unusual gains" for those firms. "Unusual gains" refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both. Promotional plans that could be interpreted to involve unusual gains require specific executive-level approval.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative, friend or acquaintance as a result of Eklund's/BCE Specialties business dealings. No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if an employee has any influence on transactions involving purchases, contracts, leases, or other similar transactions, it is imperative that he or she disclose to a Vice President or the President of Eklund's/BCE Specialties as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result in cases where an employee, relative, friend or acquaintance has a significant ownership in a firm with which Eklund's/BCE Specialties does business, and also when an employee, relative, friend or acquaintance receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Eklund's/BCE Specialties.

Outside employment by Eklund's/BCE Specialties employees that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals outside Eklund's/BCE Specialties for materials produced or services rendered while performing their Eklund's/BCE Specialties jobs.

The protection of confidential business information and trade secrets is vital to the interests and success of Eklund's/BCE Specialties. Any employee who improperly uses or discloses trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if he or she does not actually benefit from the disclosed information.

Employees must return all company property, including computer hardware and software, and any confidential business information upon termination of employment.

Computer and Internet Usage

Introduction – Computers

While email is often credited with revolutionizing business communication and enhancing productivity, the sheer volume can undermine these benefits. Additionally, as the use of email messages increases, both internally and to third parties via the Internet, Eklund's/BCE Specialties faces a number of risks.

Email may seem a more informal means of communication than letters or faxes. However, the same legal obligations and rights apply to email so sufficient care must be taken to protect Eklund's/BCE Specialties.

This Email Policy outlines the guidelines which must be followed at all times to minimize these business risks and maximize the benefits of email usage within Eklund's/BCE Specialties. Failure to conform to this policy may result in

disciplinary action. Eklund's/BCE Specialties reserves the right to amend this policy from time to time. Staff will be notified of any such amendment.

Personal Use

Eklund's/BCE Specialties email system is a corporate asset which must be used primarily for legitimate business purposes. Personal use is not forbidden, but such use must be limited and not affect work performance, or compromise the security or reputation of Eklund's/BCE Specialties. All messages received or distributed via the Company's email system remain Eklund's/BCE Specialties property.

Access

Personal mail boxes and passwords must not be shared:

- Do not leave your email accessible when away from your desk so others can read or send a message from your PC purporting to be you, or amend or delete emails in your email account. You will be held responsible for all inappropriate email activity from your account.
- If expecting email requiring attention while out of the office, use Outlook's 'Delegate' facility to enable others to read your emails and/or consider whether it is appropriate to automatically forward inbound email messages to a colleague.
- Staff must obtain approval before gaining access to the email account of a colleague in the event of either a planned or unplanned leave.

Unacceptable Use

It is strictly prohibited to send or forward emails either internally or externally which could show Eklund's/BCE Specialties in an unprofessional light; for example, messages must not:

- Contain offensive, racist or abusive language, obscene material, or used for the purpose of harassment;
- Be used for any illegal purpose;
- Be used to discuss rumors relating to any individual or company.
- Send or forward unsolicited emails, chain mail or emails with attachments known to have a virus.
- Disclose confidential or proprietary information without first obtaining the appropriate approval (note: email is not a secure method of transmitting such information).
- Forge or attempt to forge email messages, or disguise or attempt to disguise your identify when sending email.
- Set up rules to automatically forward emails received to a company email inbox to an external email address.

Best Practice Guidelines

Eklund's/BCE Specialties considers email an important means of communication and recognizes both the importance of well-worded messages and prompt replies where necessary to convey a professional image and deliver a high-quality customer service. The same care should be taken when drafting an email as for other communication. Therefore, the following guidelines should be followed when using email.

Drafting Emails

Consider whether email is the most appropriate means of communication. Research has shown that simple messages delivered by email are two times more likely to be misinterpreted than telephone conversations and three times more likely than face-to-face communication.

Situations where email is not likely to be an appropriate include communication:

- Of complex issues or concepts;
- Of a confidential or sensitive nature;
- Of messages whose meaning are sensitive to tone and interpretation;

- About an individual;
- To resolve a disagreement.

Use the subject line to summarize the content of the email to enable recipients to interpret and prioritize the message quickly. This also enables the sender and recipient to locate archived messages speedily.

Draft the email so it is brief, succinct and friendly in tone. Clearly state any action you expect the recipient to take.

The use of text abbreviations and characters such as smileys is not encouraged.

Emails should not be drafted in capital letters as this is more difficult to read.

Messages should be spell-checked before being sent.

Only mark messages as important when they require urgent attention by the recipient.

Use the 'cc' function to 'Carbon Copy' others sparingly. Consider whether it is really necessary to copy all recipients to reduce the volume of unnecessary email.

When sending attachments to colleagues internally, utilize the shortcut link instead of attaching documents to the email to prevent the unnecessary replication of files and minimize the size of the email.

Replying to Emails

As a general rule, recipients should respond to email within the same working day, if only to acknowledge receipt.

Prioritize emails requiring action and response. Those from customers and partners should generally take precedence over those from colleagues.

Consider whether it is necessary to reply to all recipients of a particular email, especially if the response is not intended for everyone on the original distribution list.

E-mail Signatures

Email signatures should be used to provide relevant contact information to external recipients and should contain your full name, job title, the trading name of Eklund's/BCE Specialties, telephone and facsimile numbers, email address, and the Eklund's/BCE Specialties website address. It should be laid out as follows:

First name Last name | Title
 Eklund's, Inc. and/or BCE Specialties, Inc.
 Address | City, State Zip
 p office# or cell phone# | f fax#
[email address](#) | [eklunds.com](#)



Disclaimer

All emails sent via the Internet should include Eklund's/BCE Specialties standard disclaimer as outlined below. This should not be removed under any circumstances.

CONFIDENTIALITY NOTICE

This message along with any enclosed documents is confidential and privileged information. It is intended only for the person(s) or organization(s) named above and any other use or disclosure is strictly forbidden. If this message is received by anyone else, please notify us at once by telephone and destroy such message without reading, printing, copying or forwarding it to anyone.

Absence

Before planned leave where email will be read only periodically or not at all, turn on Outlook's 'Out of Office Assistant' function clearly stating your dates of absence, whether email will be dealt with by someone else in your absence, and providing alternative contacts as required (note: this message should be worded professionally as it may be read by both colleagues and senders from outside Eklund's/BCE Specialties).

Newsletters and News Groups

Staff should obtain approval before subscribing to a newsletter or news group.

General Maintenance

To conserve email system capacity, proactively manage your inbox and sent items, deleting all emails you do not require a copy of.

To reduce the risk of receiving junk email, consider who you pass your email address to; there is a danger you and the entire firm will become the target of junk email. Should you have problems with unwanted emails, contact your direct supervisor.

Emails sent via the Internet are not secure. There is no guarantee of delivery and they may be tampered with by a third party. The content of a message can be modified or a message forwarded in a manner that gives the impression of it having originated elsewhere. It is therefore important to assess the authenticity of messages prior to making decisions based upon their contents.

Assume the contents of an email transmitted over the Internet may be accessible by individuals other than the intended recipients. They may be intercepted, incorrectly addressed or easily forwarded to third parties. Consequently, consider carefully the e-mail's contents to ensure no confidential or sensitive information is disclosed.

When using the Internet for bona fide business purposes, be careful not to include any wording which may be construed by a third party as legally binding or which may constitute an offer.

Users must take necessary precautions when receiving emails via the Internet with attachments. These could contain viruses and should be checked before opening. Never open email attachments from an unknown or unsolicited source – ***simply delete them.***

Do not reply to SPAM emails (mass marketing or inappropriate emails sent to a large number of addresses); this will only confirm your email address is valid and is likely to result in further SPAM emails being received. Simply delete them.

Retention

Emails should not be kept longer than necessary. Staff should proactively manage their email folders to ensure only relevant emails are retained.

Simply pressing the delete button to remove an email does not necessarily mean it will be erased in its entirety; it could remain in a trash folder or on the Eklund's/BCE Specialties backup files. If you have questions or concerns regarding the deletion of inappropriate, confidential or other emails contact your direct supervisor.

Monitoring

Eklund's/BCE Specialties will from time to time monitor staff email. Email messages and associated logs may be reviewed should Eklund's/BCE Specialties be required by law, to resolve a dispute or to investigate alleged contravention of this or any other Company policy. Monitoring procedures shall follow the principle of privacy and data protection in accordance with applicable laws and regulations.

Introduction – Internet

The Internet offers a valuable source of research and a means to conduct electronic commerce with other companies including suppliers and partners. It is also the means through which all of its employees access critical applications such as Autotask, ITSupport247, and online banking. As such, the Internet will be utilized to great benefit for Eklund's/BCE Specialties business.

This Internet Policy outlines the guidelines for use of the Internet which must be followed at all times. Failure to conform to this policy may result in disciplinary action including suspension and possibly termination.

Eklund's/BCE Specialties reserves the right to amend this policy from time to time. Staff will be notified of any such amendment.

Personal Use

The Internet must be used primarily for legitimate business purposes. Personal use is not forbidden, but such use must be limited and not affect work performance, IT network capacity, or compromise the security or reputation of Eklund's/BCE Specialties.

Access

Eklund's/BCE Specialties supports and encourages the use of the Internet, granting access to all of its employees for valid business needs.

Staff is personally responsible for taking all reasonable steps to prevent unauthorized use of the Internet via their network user account. Do not leave your Internet browser accessible when away from your desk. Staff will be held responsible for all Internet-related activities undertaken using their account.

Eklund's/BCE Specialties may block access to certain websites with inappropriate content or which present a perceived risk to the firm. However, Eklund's/BCE Specialties is under no obligation to block access to any particular website with inappropriate or illegal content.

Unacceptable Use

Any illegal or inappropriate use of the Internet is strictly forbidden. This includes access to, upload to, download from or transmission of material that contains offensive, racist, unlawful or obscene material. Should you be unsure of the suitability of any web page/site, you must consult your direct supervisor.

Chat rooms, bulletin boards and news groups enable participants to broadcast messages to a wide range of unknown recipients simultaneously. As electronic communication in this manner by staff results in either Eklund's/BCE Specialties name in the sender address or originating IP address (traceable to us), uncontrolled use of these facilities constitutes legal as well as reputation risks for Eklund's/BCE Specialties. Staff is therefore not permitted to use such publicly available facilities unless approval has been granted in advance.

Use of Instant Messaging Services (such as MSN Messenger) is not permitted unless written approval has been granted in advance. Under no circumstances may such services be used to send or receive files to either others within the firm or third parties.

Staff may not access personal email services via the Eklund's/BCE Specialties Internet connection without written approval being granted in advance.

Download of Files and Software

Staff is prohibited from downloading and/or installing any software from the Internet. Such action could:

- Infringe intellectual property rights of a third party;
- Introduce viruses into Eklund's/BCE Specialties IT network;
- Cause operational systems to cease operating correctly. Contact Beth Cunningham should you have a business need to install such software.

Data files (which includes documents, spreadsheets, presentations, pictures, audio or video) may only be downloaded from the Internet if:

- They have been checked for viruses;
- Are business relevant and are not prohibited material as outlined above (music, entertainment videos, games and screen savers are included within this list of prohibited materials);
- It does not infringe copyright.

Monitoring

Eklund's/BCE Specialties will monitor the activity of staff usage of the Internet and all office computers. Logs of such usage may be reviewed should Eklund's/BCE Specialties be required by law, to resolve a dispute or to investigate alleged contravention of this or any other Company policy. Monitoring procedures shall follow the principle of privacy and data protection in accordance with applicable laws and regulations.

Miscellaneous

Staff should obtain the appropriate permission from their direct supervisor before purchasing products or subscribing to services available via the Internet at Eklund's/BCE Specialties expense.

Personal Auto Insurance Requirements

When an employee is using their personal vehicle for a work-related purpose, the employee's personal auto insurance is primary. Eklund's/BCE Specialties auto insurance would be excess only for liability. Employees designated as both frequent and infrequent drivers must provide evidence of liability insurance for their personal vehicle as required by the corporate insurance provider to ensure adequate coverage in the event of an accident. Those drivers must also give consent to have DMV records verified at each annual renewal. Once all required information is processed and approved, notification will be given to authorize use of a personal vehicle.

For the purpose of this policy, the following are defined:

- *Frequent drivers*: Employees who are required to use their personal vehicle as part of their daily job and who are paid an auto allowance.
- *Infrequent drivers*: Those required to use their personal vehicle on an as needed basis.
- *Bodily Injury Liability Coverage*: Pays for another person's bodily injury or death in an accident that you may be found legally liable to pay.
- *Property Damage Liability Coverage*: Pays for damage to another person's car or property such as fences, buildings, utility poles, signs, and trees.
- *Declarations Page ("Dec Page")*: A page your auto insurance carrier sends you to show your premium and coverage. Liability coverage is usually shown as a set of three numbers: per person for bodily injury, per accident for bodily injury, and per accident for property damage.

Frequent and Infrequent Drivers: Requirement for Employment for assigned role description

Employees using a personal vehicle for work related tasks as defined in their assigned role description are required to carry the following coverage amounts:

Bodily injury per person = \$100,000.00

Bodily injury per accident = \$300,000.00

Property damage = \$50,000.00

Personal vehicle must be well maintained, the state inspection (if required) must be current, and the registration must be current. The **employee's** driving record will be checked annually. Approved employees will be listed as an Approved Driver by the corporate insurance provider.

Proof of Coverage

Employees using a personal vehicle for work-related tasks will be required to provide current proof of coverage by submitting the declaration page of their personal auto policy. An updated declaration page is required each time the employee's personal auto policy renews.

At no time is use of personal vehicle authorized without confirmation of approval.

Discipline

Rules infractions will be dealt with according to the seriousness of the offense, and violators will be subject to appropriate disciplinary action up to and including termination of employment. Some acts of misconduct, even if committed the first time, are so serious that, standing alone, they justify immediate discharge. Some examples of these offenses are violations of rules regarding theft, alcohol and drugs, insubordination, dishonesty, fighting, falsification of records, failure to cooperate or lying in an investigation, and unauthorized use of Eklund's/BCE Specialties communications and computer systems.

Violations of Eklund's/BCE Specialties (non-union) health and safety rules and practices will be handled under the Progressive Safety Discipline section of Eklund's/BCE Specialties (non-union) Health and Safety Program. (See Safety Policy.)

Work Hours

The following sets forth Eklund's/BCE Specialties normal work schedule.

Manufacturing	6:30 a.m. - 3:00 p.m.
Office	8:00 a.m. - 5:00 p.m.

For Manufacturing, the following schedule generally will be followed: A lunch break should be taken from 11:30 a.m. to 12:00 p.m.; breaks are generally provided at 9:30 a.m. to 9:40 a.m., and 1:30 p.m. to 1:40 p.m. For the Office, lunch should generally be taken from 12:00 noon to 1:00 p.m. This schedule may be altered by management due to business needs. Employees are to be informed of any alteration of this schedule in advance, if possible.

The normal workday is eight (8) hours, Monday through Friday, with overtime allowed at the discretion and prior authorization of management. Saturday and Sunday hours, if authorized, are flexible and will depend on business needs. As much notice as possible will be given when such a schedule is required.

It is important to Eklund's/BCE Specialties production schedule that all employees are reliable and punctual. If an employee is more than ten (10) minutes late, the time should be: (1) deducted from the daily total; or, (2) made up during lunch period or after hours, with the approval of the employee's supervisor. Repeated tardiness is grounds for disciplinary action, including termination of employment.

If an employee is ill or has an emergency situation which will cause him or her to be absent or late reporting to work, the employee must call the office within fifteen (15) minutes of the workday start and notify his or her supervisor or another member of management of the situation. Failure to adhere to this procedure and repeated absenteeism are grounds for disciplinary action, including termination of employment. Employees who are absent from work for three (3) consecutive days without giving proper notice to Eklund's/BCE Specialties will be considered as having voluntarily resigned from employment.

Inclement Weather

Eklund's/BCE Specialties recognizes that extreme or unusual weather may create difficulties for employees in reporting to work on time. In the event that Eklund's/BCE Specialties is closed due to an act of nature (blizzards, severe storms, etc.), all employees will be paid for the time they would have been regularly scheduled to work by utilizing Personal Days Off (PDO). Such time will not be applied in the computation of overtime pay.

To determine whether Eklund's/BCE Specialties will be closed due to acts of nature, employees should contact their supervisor. When in doubt, an employee is expected to report to work as long as public transportation is operating.

Employees are expected to make a good faith effort to report to work during inclement weather conditions if Eklund's/BCE Specialties is open for business. Those employees who are unable to get to work under these conditions will be required to use any available PDO. If the employee has no available PDO, then the time will be unpaid, except for employees who are not eligible for overtime. Employees, who are late because of the weather conditions, will be given the opportunity to make up their missed time if work schedules and conditions permit.

Telephone Usage

Use of Eklund's/BCE Specialties telephones is a part of the daily business procedure. Employees shall be expected to conduct telephone business efficiently and without tying up lines unnecessarily. Local practice dictates the appropriateness of telephone usage during normal working hours. For example, telephone usage in the manufacturing area should generally be limited to emergency calls during working hours. Personal cell phones may be used only on breaks. A telephone is provided in the break room for usage that complies with this policy.

Cellular phones are provided only to those employees who have a business need for such equipment. Cellular phones are to be used for business calls when other means of communicating are not appropriate in view of the situation. Charges for personal long distance calls are the employee's responsibility and should be handled accordingly.

(Also see Out of Town Travel on Company Business section.)

Personal Appearance and Uniforms

Grooming, attire and personal hygiene of employees project an image of Eklund's/BCE Specialties. Therefore, it is important for employees to comply with certain standards so they will reflect the most positive Eklund's/BCE Specialties image. Employees are expected to look presentable at all times and good personal hygiene should be practiced each day. In addition, hair and facial hair should be clean, trimmed and worn in a manner that will not pose a safety hazard.

Attire should be appropriate for the position held. In some cases, employees are required to wear uniforms. An additional required part of the uniform is an accurate twelve (12) foot (minimum) measuring tape. Employees will be notified by their supervisors if the uniform requirement applies to them.

For those required to wear uniforms, Eklund's/BCE Specialties provides each employee with changes of uniform clothing consisting of pants and shirts after 90 days of employment or at the end of probationary period. Jeans may be substituted for uniform pants as long as they are in good condition, i.e. clean and not torn or frayed. Each employee is responsible for abnormal damage to or loss of uniforms. When employment is terminated, an employee must return all uniforms. Failure to return any piece of uniform clothing will result in an appropriate deduction from any amount of monies owed to an employee to cover the replacement cost. Employees will be required to sign an acknowledgement confirming receipt of uniforms and possible reimbursement charges for replacement of lost or damaged uniforms.

Equipment, Materials, Supplies and Tools

In addition to the information below, employees should refer to Eklund's Safety Rules for additional information.

All equipment and supplies purchased by Eklund's/BCE Specialties shall remain the property of Eklund's/BCE Specialties. All employees are expected to maintain appropriate standards, safety and care for this property. Damage or failure of equipment shall be reported to a supervisor immediately.

Use of any Eklund's/BCE Specialties materials, even if perceived to be scrap, and/or the use of Eklund's/BCE Specialties tools or equipment by an employee for a personal project is prohibited unless a formal request is made and approved in advance by the employee's supervisor. Under no circumstances shall the duration of any approved personal usage be for more than two days; nor shall the personal project be for the purposes of resale.

Cell phones, radios, power tools and accessories are purchased by Eklund's/BCE Specialties and assigned to employees in accordance with job requirements.

If lost or damaged in excess of normal usage, employees are required to pay for their repair or replacement.

Employees are required to provide and maintain their own non-electric hand tools to fulfill their job requirements as a condition of employment. A list of required tools, which must comply with Eklund's/BCE Specialties standards for quality, maintenance and safety, will be provided. All power tools and specialty tools will be issued to employees by Eklund's/BCE Specialties. Employees' personal toolboxes are at any time subject to inspection by Eklund's/BCE Specialties management.

Eklund's/BCE Specialties requires employees to wear appropriate personal protective equipment in all operations where there is an exposure to hazardous conditions or where the need is indicated for using such equipment to reduce the hazards to employees. Generally, all employees involved in the manufacturing and/or installation process are required to wear approved steel-toed safety shoes. Eklund's/BCE Specialties has a practice of subsidizing the cost of this footwear up to \$25.00 once per year. Supervisors are responsible for informing affected employees of the current practice.

Appropriate eye and face protection shall be worn when machines or operations present potential eye or face injury. Eklund's/BCE Specialties has a practice of subsidizing the cost of prescription safety glasses. Supervisors are responsible for informing affected employees of the current practice. Any guests on the shop floor (business or personal) should also wear protective eye wear.

Out of Town Travel on Company Business

When traveling out of town, employees may be assigned a company cellular telephone. No collect calls or those charged to the motel room will be allowed. Personal use of company cellular telephones are allowed during out of town travel. Such usage is limited to a reasonable amount (up to three 10-minute calls per day).

Eklund's/BCE Specialties may provide company credit cards to be used for motel charges and gasoline for out of town trips. No personal charges are allowed. See Policy on Credit Card Usage.

Expense reports are generally due with the time card representing the week in which the travel occurred. All receipts for lodging and miscellaneous expenses must be attached to the expense report. A job number must accompany all expenses submitted for reimbursement.

Credit Card Usage

Eklund's/BCE Specialties credit cards are issued only to those employees making business travel arrangements or minor business-related purchases such as project supplies, parts, office supplies, that cannot be invoiced by the vendor. Personal usage of Eklund's/BCE Specialties credit cards is strictly forbidden. Receipts for all Eklund's/BCE Specialties credit card purchases must be turned in to Accounting, attached to the appropriate form, on a monthly basis. Failure to comply with expense report deadlines will result in the removal of the credit card. In this event, the employee will be required to request checks for purchases or use their own funds and submit a request for reimbursement, which must be submitted on the proper form and within 30 days of the purchase. Employees who misuse Eklund's/BCE Specialties credit cards will be subject to disciplinary action, up to and including removal of the credit card and termination of employment.

Motor Vehicle Safety Policy

Purpose

Eklund's/BCE Specialties places a premium on the safety of its employees and the general public in all aspects of its operations, including the operation of motor vehicles on the streets and highways. In order to promote safety and with a goal of reducing motor vehicle accidents and violations, all Company employees while driving a Company vehicle for Company business are required to read and comply with the following Motor Vehicle Safety Policy. Violations of the Policy can result in disciplinary action including, but not limited to employment termination, suspension, or revocation of the ability to drive for Company business.

Eklund's/BCE Specialties will check the driving record of any employee selected for a position where job duties include the operation of a motor vehicle. Failure to maintain an acceptable driving record may result in the loss of authorization to use vehicles, which could affect job status and compensation and may result in disciplinary action.

The operation by employees of company owned, leased, rental or personal vehicles as a part of their jobs is covered under a separate section of this policy. This policy states the responsibilities and requirements for all employees who are expected to operate vehicles safely to prevent accidents. Usage of company owned, leased or rental vehicles by anyone other than the authorized employee is strictly prohibited. This includes the authorized employee's family members. In addition, certain personal use of such vehicles is not covered by Eklund's/BCE Specialties insurance and the employee will be liable.

Driver License Requirements Associated with Provision of Company Vehicle or Auto Allowance

Any Eklund's/BCE Specialties employee who drives a company vehicle or receives an allowance, must, at all times, hold a valid driver's license that is not revoked or suspended in any state. Eklund's/BCE Specialties will check the employee's driving record before initially allowing any employee to drive a company vehicle or be paid an allowance and periodically thereafter. Each such employee must execute the appropriate documents necessary for Eklund's/BCE Specialties to obtain his or her driving history, commonly referred to as a motor vehicle record or "MVR." The executed appropriate MVR release documents must be kept in the employee's file at all times. The failure of that employee to grant authorization to Eklund's/BCE Specialties to obtain that employee's MVR will result in that employee not being allowed to drive an Eklund's/BCE Specialties company vehicle or any vehicle while conducting business for Eklund's/BCE Specialties. If a MVR indicates a poor driving record for newly assigned or current drivers, Eklund's/BCE Specialties has the right to restrict, limit or revoke driving privileges of any company vehicle or driving while on company business.

Valid Driver's License Requirement

All Drivers must hold a valid driver's license in the state in which their vehicle is principally garaged, and which permits operation of the type of vehicle being used by the driver.

In the event that the Driver's applicable license is suspended or revoked by the authority having jurisdiction, the Driver must report to their Supervisor within one (1) business day of that development.

Each employee must execute the appropriate documents necessary for Eklund's/BCE Specialties to obtain their MVR (Motor Vehicle Record). Failure to grant such authorization will result in revocation of driving privileges and/or the assigned company vehicle.

Compliance with Traffic Laws

Eklund's/BCE Specialties requires its Drivers to obey all local, State and Federal traffic laws.

- **Parking Violations**

It is the responsibility of each employee to park the vehicle they are driving in an appropriate parking space or legal parking area. Each employee is responsible for any parking violations they receive or any late fees, fines or court cost that may result from unpaid parking violations; unless prior arrangements have been made with your supervisor identifying unusual parking problems that could result in parking violations.

- **Traffic Citations**

It is the responsibility of each employee to follow the rules of the road, obeying all traffic laws. Each employee is responsible for any traffic citation they receive or any late fees, fines or court cost that may result from unpaid citations.

- **Supervisor Notifications**

It is the responsibility of the employee to notify a supervisor in the following instances:

- license is suspended or revoked
- moving violation
- DUI or DWI received
- Motor vehicle accident

Use of Seat Belts

Eklund's/BCE Specialties requires its Drivers to wear seat belts while operating a motor vehicle.

Prohibition Against Driving While Impaired

Eklund's/BCE Specialties prohibits its Drivers from driving while intoxicated or under the influence of any illegal or unlawfully possessed drug or any medication that impairs the Driver's abilities.

Discouragement of Cell Phone Use

Eklund's/BCE Specialties discourages its Drivers from using a cell phone while driving and requests that its Drivers make every attempt to plan calls so they occur while a vehicle is not being operated. Eklund's/BCE Specialties also encourages its Drivers to pull the vehicle off of the road into a safe area prior to making or receiving non-emergency cell phone calls whenever possible.

This policy states the responsibilities and requirements for all employees who are expected to operate vehicles safely to prevent accidents. Usage of company owned, leased or rental vehicles by anyone other than the authorized employee is strictly prohibited. This includes the authorized employee's family members. In addition, certain personal use of such vehicles is not covered by Eklund's/BCE Specialties insurance and the employee will be liable.

Additional Circumstances Resulting in Prohibition of Driving for Company Business

Eklund's/BCE Specialties reserves the right to prohibit a Driver from driving on Company business under any of the following circumstances:

- The Driver has misrepresented the facts of any situation;
- The Driver has used the vehicle for any purpose in violation of Federal, State or Local laws;
- The Driver left the scene of an accident without making required reports of such occurrence to the appropriate law enforcement authorities and/or fails to cooperate with such authorities.

Policy for Use of Company Owned Vehicle

Authorized Operators of Company Vehicles

- The Eklund's/BCE Specialties employee designated for that vehicle.
- Other employees of Eklund's/BCE Specialties as approved for company business.

Personal Use of Company Vehicles

- Employees assigned a company vehicle may use the vehicle for incidental personal use only.
- A company vehicle shall not be used for vacations, holiday trips, or weekend excursions. Any such personal use is prohibited.
- The personal use of a company vehicle is a privilege and can be modified or withdrawn at the sole discretion of Eklund's/BCE Specialties.

Employees are prohibited from:

- Carrying fire arms in company vehicles
- Carrying drugs, drug paraphernalia, or alcohol
- Smoking in company vehicles
- Transporting hitchhikers or strangers in company vehicles
- Operating motorcycles on company business
- Overloading a vehicle beyond its legal limit
- Adding non-OEM equipment or altering the vehicle from its original state or intended use
- The use of an Eklund's/BCE Specialties vehicle for any business other than Eklund's/BCE Specialties.

Use of Personal Vehicles

Occasionally, an employee may use his or her personal vehicle for Eklund's/BCE Specialties business purposes, but only when an Eklund's/BCE Specialties vehicle is not available and the trip is approved in advance by management.

The odometer readings when leaving and returning to the manufacturing facility should be recorded on an expense report. Reimbursement will be made at the prevailing rate allowed by the IRS.

Employees who are paid an auto allowance will be required to provide a copy of their personal automobile insurance policy declaration page and carry a minimum of \$300,000 combine single limit coverage.

Tobacco Usage

Eklund's/BCE Specialties prohibits all employees from smoking in the office, in the manufacturing facility, and in any Eklund's/BCE Specialties vehicle. Smoking shall be allowed in designated outdoor smoking areas only, which will be clearly marked with appropriate signs. Any and all city, county and state ordinances, as well as designations and specifications at job sites, regarding smoking shall be complied with to the fullest extent. Executive management shall be responsible for designating smoking and non-smoking areas.

In accordance with Eklund's/BCE Specialties (non-union) Safety Policy, safety of our employees, customers, and the general public is of primary concern. Therefore, all manufacturing facilities shall be designated as non-smoking areas due to the potential hazards that may exist.

In addition, to promote safety and good housekeeping, employees are not allowed to spit or otherwise dispose of smokeless tobacco products unless it is in an appropriate receptacle that can be disposed of properly.

Pay Period, Pay Day, Time Keeping and Termination

Eklund's/BCE Specialties work week runs from Monday through Sunday. Employees are paid for each work week on the following Friday (one week in arrears). Exceptions may occur due to recognized holidays.

Time keeping (either through paper time card or computerized system) must be completed or docked daily and turned in each Monday morning. Employees in branch offices must fax their time cards to Accounting prior to 10:00 a.m. each Monday. Adjustments may occur due to recognized holidays. They should then mail the original time card to Accounting. Supervisory approval of all time keeping is required prior to submitting to Accounting for payroll.

An employee who resigns will receive his/her paycheck on the next regular payday. An employee whose employment is terminated will receive his/her paycheck, less deductions for any outstanding indebtedness to Eklund's/BCE Specialties, in accordance with applicable state law.

In the month of January of every year, each employee will be mailed a IRS Form W-2 indicating wages actually received in the previous calendar year. This form will be mailed to the employee's address that is on file with Eklund's/BCE Specialties. It is the employee's responsibility to notify Eklund's/BCE Specialties of any change in mailing address.

Rates of Pay (Overtime)

The following overtime policy applies to non-exempt employees only. Exempt employees are not eligible for overtime.

Eklund's/BCE Specialties recognizes there may be circumstances requiring employees to work overtime. Whenever possible, prior notice shall be given to the employee so conflicts may be avoided.

Overtime shall be defined as hours actually worked in excess of 40 hours per workweek. However, Recognized Holidays are included and used to calculate overtime. Time recorded for Personal Days Off and other types of leave will **not** be used to calculate overtime.

Non-exempt employees will be compensated for overtime at 1.5 times their hourly wage rate. If work is required on Sunday and the employee has worked a minimum of eight (8) hours on Saturday and works in excess of 40 hours in the workweek, the pay for Sunday will be at 2.0 times their hourly wage rate. Employees shall not work overtime hours unless approved and scheduled in advance by their supervisor.

Payroll Advances and Employee Loans

Eklund's/BCE Specialties does not have a policy for granting payroll advances or employee loans.

Return to Work Process

Eklund's/BCE Specialties is committed to providing a safe and healthy workplace for its employees. Preventing injuries and illnesses is Eklund's/BCE Specialties primary objective. See Safety Policy for additional information.

If an employee is injured, Eklund's/BCE Specialties will use its return to work process to provide assistance. Eklund's/BCE Specialties policies and procedures have been developed to ensure that employees who are injured on the job will get immediate, appropriate medical attention. In addition, Eklund's/BCE Specialties will attempt to create opportunities for injured employees to return to safe, productive work as soon as medically possible.

Eklund's/BCE Specialties ultimate goal is to return injured employees to their original jobs. If an injured employee is unable to perform all the tasks of the original job, Eklund's/BCE Specialties will make every reasonable effort to provide alternative productive work that meets the injured employee's capabilities. Rate of pay for an alternative assignment will be determined by Eklund's/BCE Specialties management.

About Performance Reviews

Performance measurement is a dynamic process and, as new methods are developed, they will be incorporated as appropriate. At Eklund's/BCE Specialties, we believe the systems we design are the primary contributors to the success of the individual. Improving the system, processes, personal skills, and maintaining or improving equipment contributes to the success of each employee and the company. We believe measures are a valuable tool used to assist in the development of the employee. In the endeavor to help each employee reach their fullest potential in a positive and constructive environment, each role within the organization has defined processes and measures. Measures will be reviewed on control charts which indicate how well the person is working within the system and whether the person is the primary contributor to the results. All employees are responsible for documenting and fixing problems in the system, which include requesting training for present and future needs and improvement.

Eklund's/BCE Specialties encourages honest and open communication through learning and spreading knowledge formally and informally. Monthly review of measures with their supervisors is the formal format where employees can communicate issues and make suggestions. Each employee is personally responsible for documenting and communicating the following whenever it is identified:

- Equipment that needs repair or replacement
- Things that go wrong and can be prevented
- Things that could be made easier or more efficient
- Equipment or supplies that are needed
- Items that were identified as a problem or observation
- Safety Incidents and/or issues
- Things that have been learned

Use of the Model for Improvement's questions will occur routinely, so employees are encouraged to use this format during communication. Unacceptable system performance will be submitted for improvement projects. Employees with subject matter expertise will be expected to contribute to improvement efforts as part of their personal performance responsibilities.

Within 90 days of employment, supervisors will appraise personal performance as it relates to measures and improvement efforts. A determination will be reached, and each such employee shall then be classified as a regular employee, shall be terminated, shall resign, or shall mutually agree with Eklund's/BCE Specialties to an extended orientation (probation) period.

On a quarterly basis, the results of the company will be shared with all employees. Measures and improvement efforts will be reviewed. Reward funding based on corporate results will be made available to individuals based on their personal measures (FOM's).

At all times, employment is considered at-will and the employment relationship may be terminated at any time for any lawful reason by either party.

WORKER'S COMPENSATION INSURANCE

Each state has Workers' Compensation laws that guarantee certain benefits to employees who are injured or become ill because of their jobs. Any job-related injury is covered. The key is whether it was caused by the job. For example, some injuries incurred during off-duty company activities or horseplay in the office may not be covered. All injuries need to be reported to the Office Safety Coordinator immediately to determine if the injury is work related. ***Any delay in reporting an injury may result in the loss of the right to compensation benefits.***

Benefits

Medical Care

All medical treatment costs are paid directly by Eklund's/BCE Specialties Workers' Compensation insurance carrier. If Eklund's/BCE Specialties has designated a specific medical clinic and pharmacy to be used for obtaining treatment, the employee must use those facilities. If employees want to change doctors, they must receive authorization from the Workers Compensation Insurance agent assigned to the claim. If employees go to a doctor or pharmacy without authorization, it is at their own expense.

If Eklund's/BCE Specialties does not have a designated medical facility or pharmacy in the area, employees can use the medical facility or pharmacy of their choice as long as Workers Compensation is accepted.

Payment for Lost Wages

Employees are eligible for income payments equal to a percentage of their income. Payments will continue until a physician authorizes the employee to return to work.

Accident Reports and Postings

Copies of required accident reports and investigations are maintained by the HR/Administrative Assistant. A written report is maintained on each accident, injury, or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on the OSHA Log and Summary of Work-Related Injuries and Illnesses, Form 300A. Each year OSHA Form 300A is posted no later than February 1 until April 30 of the year following the year covered by the form. These records are maintained for five years from the date of preparation.

Within eight (8) hours after the death of any employee from a work-related incident or the in-patient hospitalization of three or more employees as a result of a work-related incident, you must orally report the fatality/multiple hospitalization by telephone or in person to the Area Office of the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor, that is nearest to the site of the incident. You may also use the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742).

Group Insurance

Eklund's/BCE Specialties provides basic health and term life with accidental death and dismemberment insurance for all full-time employees after ninety (90) days of employment. When an employee becomes eligible, he/she may elect to enroll his/her dependents for coverage at his/her expense. See the summary plan description and official plan documents for more information regarding these benefits.

The Consolidated Omnibus Budget Reconciliation Act of 1986, (COBRA), provides eligible terminating employees with a plan to continue health insurance plans after termination of employment. The coverage shall remain the same; however, the employee is responsible for the entire cost plus a 2% administrative cost. An appropriate notice explaining his/her rights will be provided when an employee's employment is terminated.

Personal Days Off and Application for Leave

Employees are eligible for Personal Days Off (PDO) each year based on their length of service in accordance with the following schedule. Personal Days Off may be used for vacation and/or sick days.

- 40 hours of PDO accrue on the first anniversary of the date of employment.
- 80 hours of PDO accrue on the second through the ninth anniversaries of the date of employment.
- 120 hours of PDO accrue on the tenth through the nineteenth anniversaries of the date of employment.
- 200 hours of PDO accrue on the twentieth and following anniversaries of the date of employment.

The appropriate hours of PDO become available on the employee's anniversary date of his/her employment. For example, if an employee is hired on February 10, 2013, he/she would accrue 40 hours of PDO on February 10, 2014. PDO must be used in 2-hour increments. All PDO hours should be used prior to the next anniversary of employment. No carryover from one anniversary year to the next is allowed.

With prior management approval, an employee may elect to be paid at the end of the anniversary year for unused PDO time in lieu of taking time off.

All PDO time and other leave without pay must be approved in advance. An application should be submitted to the employee's supervisor at least two (2) weeks in advance of the desired effective date. A copy of the approved/denied application will be returned to the employee. Any approved leave will be noted on the PDO calendar maintained by Accounting.

Approval of PDO leave is subject to consideration of existing workload, staffing levels, seniority, and timeliness of request.

When unscheduled PDO time and other leave without pay is due to illness and consists of two or more concurrent days off (or three intermittent days in a 30-day period), evidence of a doctor's visit may be required upon returning to work.

Health and Wellness Program

Eklund's/BCE Specialties cares about the health and well-being of their employees. Eklund's/BCE Specialties comprehensive wellness program is designed to be fun, informative, and helpful. Employees have the opportunity to earn a Wellness paid day off by participating in an annual health screening as well as meeting other requirements set each program year. Within this program, there are also many health and wellness resources available to the entire family.

Recognized Holidays

Eklund's/BCE Specialties observes seven (7) paid holidays per year. Generally, these holidays include:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Day

Management may alter this schedule to accommodate the calendar in any particular year.

An employee must work or be on pre-approved time off (either paid or unpaid) the day before and the day after the recognized holiday in order to receive holiday pay.

Other Leaves

General Leave of Absence

Situations arise due to illness, injury or temporary disability of an employee or family member that may render an employee unable to work. Eklund's/BCE Specialties has made provisions, which may allow an unpaid General Leave of Absence that permits time off (after Personal Days Off are used) but also provides the employee the security of returning to work at the expiration of the leave. General Leave must be requested in writing stating the reason for the leave and the requested duration. If the leave is requested for medical reasons, a physician's statement is required. Any employee returning from a leave due to personal medical reasons is required to provide a physician's release to return to work. Eklund's/BCE Specialties management may use its discretion in approving any requested leave and will notify the employee as soon as possible if the leave is approved or not.

Military Leave

Employees may serve in the military in a reserve capacity or on an extended active duty assignment. Any employee desiring Military Leave to engage in active or inactive military training duty in the armed forces of the United States (including the National Guard) must submit a written request as soon as it is known that military service is scheduled. A copy of the military orders must accompany the request. Such leave is subject to reasonableness and good faith on the part of the employee. Reasonableness is partly determined by the communicated policies and legitimate needs of Eklund's/BCE Specialties and the timing of the request. The duration of the Military Leave is limited to the period of the military training. Reinstatement from Military Leave shall be granted in accordance with state and federal law.

Death in the Family

If there is a death in an employee's immediate family, the employee will be allowed up to three days unpaid funeral leave. Immediate family is defined as: spouse, domestic partner, children, parents, siblings, grandparents, grandchildren, aunt, uncle, niece/nephew, brother-in-law, sister-in-law, son-in-law, daughter-in-law, mother-in-law, and father-in-law. An employee may elect to have this time counted as Personal Days Off (PDO) and if needed, should request additional travel time from their immediate supervisor.

Jury Duty

If an employee is called for jury duty, he/she will be permitted to take the necessary time off but only for the time that juror functions are required. As soon as the employee is informed that he/she is a candidate for jury service, the employee's supervisor should be provided a copy of such notice.

Employees on jury duty will be paid their regular wages by Eklund's/BCE Specialties, not to exceed eight (8) hours per day, minus any compensation received for jury service. Time paid for jury duty does not count in determining overtime for the week.

401(k) Retirement Savings Plan

Eklund's/BCE Specialties provides a retirement and profit sharing plan for its full-time employees to assist in providing a better standard of living after retirement than employees may have from Social Security and their personal savings alone. Employees become eligible after they have completed twelve (12) months of service and they have attained the age of 21. Plan entry dates are January 1 and July 1. When an employee becomes eligible, a summary plan description is provided.

Plan participants are allowed to make elective deferrals of their compensation from 1% to 100%, up to Federal tax law limitations. Matching contributions, as a percentage of the participant's elective deferrals, may be made in an amount to be determined by Eklund's/BCE Specialties each year. In addition, Eklund's/BCE Specialties will determine the amount of any profit sharing contributions, if any, it will make to the plan each year.

An annual statement of total benefits accrued and vested is furnished to all participants.

Tuition Reimbursement

Eklund's/BCE Specialties recognizes that the skills and knowledge of its employees are critical to the success of the organization. The Tuition Reimbursement program encourages professional and personal development through formal education so that employees can maintain and improve job-related skills. Eklund's/BCE Specialties may pay the full cost of tuition for courses, which will improve an employee's job performance. Employees should contact a Vice President or the President and complete an application form for inclusion in the program in advance of enrolling in the desired course.

Reimbursement will require proof of satisfactory completion of the course. Reimbursement will be made in accordance with applicable tax laws. Employees may be required to enter into a payback agreement, which would be activated in the event of termination of employment, prior to receiving benefits under this program.

The tuition reimbursement application is located in the FORMS section on pages 55 - 56.

EKLUND'S & BCE SPECIALTIES (NON-UNION) HEATH AND SAFETY MANUAL

HEALTH AND SAFETY INTRODUCTION

Every employee should have a written injury and illness prevention program. The contents of this manual provide the framework for Eklund's/BCE Specialties (non-union) program. Please read it carefully. While no plan can guarantee an accident-free workplace, following the safety procedures set forth in this manual will significantly reduce the risk of danger to you and your coworkers.

Company policy, as well as state and federal laws, make the safety and health of our employees the first consideration in operating our business. Safety and health in our business must be a part of every operation, and every employee's responsibility at all levels. It is the intent of Eklund's/BCE Specialties to comply with all laws concerning the operation of the business and the health and safety of our employees and the public. To do this, we must constantly be aware of conditions in all work areas that can produce or lead to injuries. No employee is required to work at a job known to be unsafe or dangerous to his or her health. Your cooperation in detecting hazards, reporting dangerous conditions, and controlling workplace hazards is a condition of employment.

The personal health and safety of each employee of Eklund's/BCE Specialties is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity. To the greatest extent possible, management will provide all mechanical and physical protection required for personal health and safety, but our employees must bear primary responsibility for working safely. Common sense and caution can prevent most accidents from occurring.

HEALTH AND SAFETY POLICIES AND RESPONSIBILITIES

Health and Safety Policy Statement

Eklund's/BCE Specialties is committed to safety and to eliminating both human suffering and the financial costs of accidents. We recognize that it is important to our successful operation to prevent the occurrence of incidents that lead to injuries or illnesses. We all must be committed to the performance of our duties in a safe manner. Accidents occur because of either unsafe acts by people or unsafe conditions in the work area. The objective of this safety statement is to communicate Eklund's/BCE Specialties commitment and intent to eliminate accidents. To this purpose, we make the following statements.

- The safety of our employees, clients, and the general public is of primary concern. We accept our responsibility to provide a safe and healthful work environment with proper equipment, to provide adequate training to ensure every employee is prepared to work safely, to require compliance with established rules and procedures and follow operating practices which result in safe working conditions on company premises and job sites.
- Safety will take precedence over expedience or shortcuts. Each employee has the responsibility to avoid unsafe acts and conditions even when working alone on job sites. OSHA and other applicable regulations must be observed and maintained as a minimum standard.

By observing and managing these objectives, our safety record can assist Eklund's/BCE Specialties in being unsurpassed in the delivery of design, planning, and construction services.

Safety Responsibilities and Authority

All employees play an important role in helping to ensure a healthy and safe work environment. Certain employees and government agencies have specific responsibilities and authority. This section defines the roles of the following groups.

- Occupational Safety and Health Act (OSHA) Compliance Officers
- Safety Director
- Office Safety Coordinators
- Management and Supervisors
- Employees

Occupational Safety and Health Act (OSHA) Compliance Officers

Federal and/or state compliance officers have full legal authority to enter and inspect premises or job sites without delay, at a reasonable time, upon presentation of credentials. Compliance officers should be treated professionally, courteously, and offered full cooperation. The Office Safety Coordinator or a designated employer representative may accompany the official and is entitled to a closing conference at which safety violation abatement procedures/timetable will be given.

Compliance officers are entitled to interview and take written statements from employees. Basically the compliance officer has as many or more rights as a police officer with a warrant.

The OSHA compliance officer has authority to issue citations in the following categories. Employers may contest any citation, pay the appropriate penalty, and abate the hazard.

- Serious violations
- Non-serious violations
- Willful violations
- Repeated violations
- Notice of imminent danger

Safety Director

Eklund's/BCE Specialties Safety Director has the authority to implement the company's safety program. The Safety Director's name and telephone number is posted in each office with other safety and emergency-related contacts.

The Safety Director's responsibilities include the following.

- Developing and maintaining Eklund's/BCE Specialties (non-union) overall safety program.
- Coordinating and responding to outside safety consultants, third-party claim administrators, safety material vendors, medical clinics, attorneys, and injured employees.
- Maintaining company-wide safety and accident records.
- Assisting with safety-related training for management and employees.
- Ensuring compliance with appropriate federal, state, and local health and safety regulations.
- Ensuring that all employees receive a copy of the Eklund's/BCE Specialties (non-union) Health and Safety Manual.
- Assisting with serious accident investigations and fraudulent claims as necessary.

The Safety Director has authority to issue directives to all personnel on safety and accident prevention program issues or procedures.

Office Safety Coordinator

Each office shall have a designated Safety Coordinator responsible for assisting the Safety Director in implementing and maintaining Eklund's/BCE Specialties (non-union) safety program within the particular office or site.

The Office Safety Coordinator's responsibilities include the following.

- Maintaining the office Hazardous Materials Safety Manual.
- Ordering and maintaining proper inventory of safety-related equipment and material.
- Assisting with safety-related training for all employees.
- Providing office safety and accident information to the Safety Director.
- Maintaining postings for health and safety-related notices and warnings.
- Accompanying OSHA compliance officers during on site inspections or accident investigations.
- Maintaining office health and safety training records.
- Conducting random job site safety surveys to determine safety conditions and evaluate client/employee safety awareness.

Management and Supervisors

Under federal and state occupational state laws, managers and supervisors are fully responsible for the prevention of employee work-related injuries or illnesses. While the Safety Director is responsible for coordinating the safety program, management bears the ultimate responsibility of ensuring compliance.

Management's responsibilities include the following.

- Providing resources for training, personal protective equipment, etc. as necessary.
- Ensuring compliance with safety directives.
- Ensuring contracts are in compliance with OSHA standards and Eklund's/BCE Specialties (non-union) safety program.

Management has authority to implement discipline in safety-related matters.

Employees

Ultimately each employee is responsible for his or her own health and safety. No employee is required to work at a job that is unsafe or dangerous to his or her health. Employee cooperation in complying with safety regulations and

in detecting unsafe or dangerous conditions will help ensure a safer work environment.

Employees safety responsibilities include the following.

- Reviewing and following the safety rules and guidelines contained in the Health and Safety Manual.
- Complying with Eklund's/BCE Specialties (non-union) injury and illness prevention program as well as the safety programs of clients when working in the field.
- Reporting for work in a fit condition to do their job. (Unfit persons will not be permitted to work.)
- Avoiding the use of any substance that may impair the employee's ability to perform his/her job in a safe manner.
- Wearing suitable work clothing, footwear, and personal protective equipment as directed or needed.
- Driving defensively when using vehicles on company business.
- Correcting unsafe conditions or practices that may lead to accidents.
- Participating in work-related and job site safety training and orientations sessions.
- Reporting every injury that occurs on the job and in the shop to the designated Office Safety Coordinator as soon as possible.

Under federal and state OSHA regulations, Eklund's/BCE Specialties (non-union) is required to have an effective system for communicating with employees on health and safety matters applicable to their jobs. General and specific safety training is OSHA mandated. Other training and communications programs are designed to address these needs. Employers are required to have a progressive discipline system to reinforce the seriousness of health and safety communication training.

Safety Training

The purpose of safety training is to ensure that managers and employees understand their safety roles and responsibilities, thereby avoiding work-related injuries and illnesses. Under OSHA, safety training is required as follows.

- For new employees.
- For employees reassigned to a new job.
- When new substances, processes, procedures, or equipment are introduced.
- When new information is available on a previously unrecognized hazard.
- For managers and supervisory staff to become familiar with hazards to which their employees may be exposed.

General Safety Training

All employees will receive training in general safe work practices. This training will begin during new employee orientation and will be ongoing. Some of the topics in which all employees will receive instruction will include the following.

- Health and safety rules.
- Medical and first aid procedures.
- Fire prevention and use of fire extinguishers.
- The importance of reporting to work free of the influence of alcohol or drugs.
- Emergency preparedness procedures.
- Personal protective equipment.
- Good housekeeping practices.
- Safe operation of machinery and equipment.
- Lifting procedures.
- Using and understanding the Hazardous Materials Safety Manual.

Specific Safety Training

Specific safety training is required for jobs that produce a special or specific hazard. In addition to receiving general safety training, employees will receive specific safety training in the following areas.

- When required to use hazardous substances or materials.
- When exposed to unsafe work conditions.
- Prior to beginning work at a new project.
- During periodic safety communication meetings for all employees working in the construction environment.
- When using a ladder.
- When welding metals

Client or Contractor Safety Training

Our clients or construction contractors must provide general or specific training as necessitated by the hazards our employees are exposed to on job sites. This includes training covering any exposure to hazardous substances. Employees working on these projects are required to participate in this training.

Hazardous Materials Communications

Under federal and state OSHA, employees have a right to know about the hazards of substances they are exposed to in the course of their everyday work. In order to comply with OSHA regulations and to ensure our employees understand the hazards of the material they work with, Eklund's/BCE Specialties provides the following training and communication.

- A written Hazardous Materials Safety Manual.
- Centrally located Material Safety Data Sheets (MSDS) with ongoing training on their use.
- Ongoing training in the hazards of materials they use and how to properly handle these materials.

Hazardous Materials Safety Manual

The Hazardous Materials Safety Manual is kept in a prominent location in each office and is maintained by the Office Safety Coordinator. This manual contains the following information.

- An inventory of all hazardous substances in the office listing the substance and its location. Old materials or materials no longer used should be identified for legal and safe disposal.
- Material Safety Data Sheets (MSDS) for all hazardous substances stored in the office.
- Names and telephone numbers for:
 - Emergency response
 - Nearest hospital
 - Eklund's/BCE Specialties Safety Director
 - Eklund's/BCE Specialties Office Safety Coordinator
 - Area Environmental Protection Agency (EPA) office
 - Area OSHA office

Material Safety Data Sheets (MSDS)

MSDS shall be kept for all hazardous substances stored or used in Eklund's/BCE Specialties offices or on Eklund's/BCE Specialties job sites. Hazardous substances are any substances that damage the skin, eyes, or lungs including combustibles, compressed gas, explosives, carcinogens, corrosives, and sensitizers - basically anything requiring or containing a warning label. All MSDS are kept in the Hazardous Materials Safety Manual for review by all employees. MSDS should also be kept and displayed in close proximity to any hazardous substances that require special precautions or protection while using or handling.

Each vehicle must carry MSDS appropriate for hazardous materials being transported.

Contractors should be asked to furnish MSDS to Eklund's/BCE Specialties management with details of any hazardous materials to which any Eklund's/BCE Specialties employees may be exposed.

If any new significant health information is added to MSDS, the Office Safety Coordinator will do the following.

- Distribute new copies of the MSDS to replace the superseded one.
- Retrain employees on the new information as soon as possible.

MSDS Medical Use

Employees who sustain a hazardous material injury or illness requiring medical treatment should be in possession of the appropriate MSDS at the time of the first (emergency) medical treatment. The MSDS provides useful treatment information and emergency phone numbers to treating physicians.

Progressive Safety Discipline

Under OSHA, all employers are required to have a progressive safety discipline procedure. Even though the person to benefit most from safety is the employee, this does not guarantee they will always observe safety rules. Progressive discipline will ensure employees comply with health and safety work practices. **Safety absolutely will not take second place to expediency and shortcuts.**

General Safety Violations

Employees are subject to the following progressive discipline if they are unwilling or unable to work to the company safety rules and standards. The progressive safety violations policy is as follows.

- **First Violation**
 - Employees will be advised that they are not working safely. They will be instructed on (1) how to safely perform the operation, and (2) the reason for performing the operation safely.
- **Second Violation**
 - The supervisor will issue a written Employee Safety Warning Report, and the employee's file is noted. Depending on the seriousness of the violation, the employee may be subject up to a three-day suspension without pay.
- **Third Violation**
 - Same as the second violation. A third violation within any six-month period will result in further disciplinary action up to and including termination. A written Employee Safety Warning Report will be issued. The employee's file is noted.

Life Threatening Safety Violations

Definition: As a general rule, a life-threatening safety violation is one which may cause immediate threat to life or serious injury to the employee personally or to another individual.

- **First Violation**
 - A thorough investigation will be undertaken to determine the cause of the violation. Depending on the findings, the following actions may be taken.
 - A suspension without pay (for a period to be decided upon).
 - Deliberate, willful neglect and/or gross negligence: Employees may be IMMEDIATELY TERMINATED.
 - A written Employee Safety Warning Report will be issued. The employee's file is noted.

Employee Safety Suggestions and Safety Committee

The prevention of work-related illnesses and injuries is of primary importance at Eklund's/BCE Specialties. No employee is required to work at a job that is unsafe or dangerous to his or her health. Employees have the right and are encouraged to raise safety concerns and suggestions at any time. Each employee has the responsibility to report unsafe conditions to management as soon as the condition is recognized.

A Central Safety Committee composed of all members of management (those with supervisory responsibilities), Safety Coordinators (from each location), Safety Committee Members (two or three employees selected by their peers), and the Safety Director will meet monthly to address injury and accident prevention, health and safety issues, employee safety suggestions, and the status of all injured employees. Minutes of the safety meeting will be posted for employees review.

Keeping Employees Informed

Employers are responsible for keeping employees informed about OSHA and about the various health and safety matters with which they are involved.

Required Postings

Federal OSHA and states with their own occupational health and safety programs require that each employer post certain materials at prominent locations in the workplace. These include the following.

- Job Safety and Health Protection workplace poster (OSHA 2203 or state equivalent) informing employees of their rights and responsibilities under the Act. Besides displaying the workplace poster, the employer must make available to employees, upon request, copies of the Act and copies of relevant OSHA rules and regulations.
- Summaries of petitions for variances from standards or record keeping procedures.
- Copies of all OSHA citations for violations of standards. These must remain posted at or near the location of alleged violations for three days, or until the violations are corrected, whichever is longer.
- Log and Summary of Occupational Injuries and Illnesses (OSHA 200). The summary page of the log must be posted no later than February 1 and must remain in place until March 1.

Examining Medical Records

All employees have the right to examine any records kept by their employers regarding their exposure to hazardous materials or the results of medical surveillance.

Occasionally OSHA standards or National Institute of Occupational Safety and Health (NIOSH) research activities will require an employer to measure and record employee exposure to potentially harmful substances. Employees have the right (in person or through their authorized representative) to be present during the measuring, as well as to examine records of the results.

Under these substance-specific requirements, each employee or former employee has the right to see his or her examination records and must be told by the employer if exposure has exceeded the levels set by standards. The employee must also be told what corrective measures are being taken.

EMERGENCY PREPAREDNESS

An emergency action plan is a critical element in Eklund's/BCE Specialties (non-union) Health and Safety Program. This plan will provide each office the means for handling natural disasters or other emergency conditions that can be reasonably anticipated. A practical emergency plan, simple in format, easily understood and properly prepared in anticipation of predictable disasters or emergencies will assist in minimizing injuries, damage, trauma, or environmental damage associated with the event.

Emergency Action Plan

Each office has an Emergency Action Plan posted in prominent locations throughout the premises to facilitate the orderly evacuation of personnel in case of an emergency or natural disaster. The plan is to be maintained and updated by the Office Safety Coordinator. The Emergency Action Plan includes the following.

- Emergency escape procedures and emergency escape route assignments.
- Procedures to be followed by employees who remain to maintain critical operations before they evacuate.
- Procedures to account for all employees after emergency evacuation has been completed.
- The preferred means of reporting fires and other emergencies.
- Names or regular job titles of persons who can be contacted for further information or explanation of duties under the plan.

Emergency Evacuation of Premises

Not all emergencies require an evacuation of the workplace. The office management or delegated representative shall make the decision whether or not to evacuate. If evacuation is required, the office manager and delegated supervisors will be responsible for accounting for employees and any visitors on the premises. Upon reaching a designated reunion point, a head count should be taken to ensure no employee is left in danger. Special prior arrangements are necessary for disabled employees.

WORKPLACE ACCIDENTS

Most workplace accidents are caused by either unsafe acts or unsafe conditions. While it is not possible to provide a complete list of acts and conditions, the following are regarded as the basic unacceptable acts and conditions that exist throughout all industries.

Unsafe Acts

Definition: The unsafe act is a violation of an accepted safe procedure that could lead to an accident.

- Operating equipment without authority.
- Failing to warn of unsafe conditions.
- Operating at improper speed or using equipment improperly.
- Making safety devices inoperable or using defective equipment.
- Failing to use personal protective equipment.
- Loading or placing improperly and lifting improperly.
- Servicing equipment in motion.
- Drinking, drugs, or horseplay
- Failing to wear safety belts.
- Failing to use safety devices.

Unsafe Conditions

Definition: The unsafe condition is a hazardous physical condition or circumstances that could lead to an accident.

- Inadequate guards or protections from moving machinery.
- Defective tools, equipment, substances.
- Congestion and excavation.
- Inadequate warning system or medical planning.
- Fire and explosion hazards.
- Substandard housekeeping.
- Hazardous atmospheric conditions such as gases, dusts, fumes, or vapors.
- Excessive noise.
- Radiation exposures and overhead electrical cables.
- Inadequate illumination or ventilation.

By avoiding unsafe acts and creation of unsafe conditions, employees remove the fundamental causes of most accidents.

Accident Response and Reporting

The following procedure is to be used if an employee is injured at work. **ALL** injuries, no matter how slight, are to be reported to the Office Safety Coordinator.

Severe injury requiring immediate emergency care

- Call for emergency services.
- Provide on-site first aid until emergency services arrive.
- Immediately notify the Office Safety Coordinator and office management.

Injury requiring non-emergency medical treatment.]

- Provide on-site first aid.
- Send employee to company authorized medical facility if designated; if not, send employee to nearest medical treatment facility.
- Immediately notify the Office Safety Coordinator and office management.

Injury requiring on site medical treatment only.

- Provide on-site first aid.
- Immediately notify the Office Safety Coordinator and office management.

Near Miss Investigations

In addition to accidents that cause injury, accidents with no injuries (near-misses which could have caused injury but didn't) must be reported and investigated. Non-injury accidents and near-miss incidents should be reported to the Office Safety Coordinator immediately. It is of utmost importance to determine the cause of any accident or potential accident in order to identify and remove possible hazards before they cause an injury.

First Aid

Responders trained in first aid and appropriately stocked first aid cabinets are available at each job site. The more hazardous the work and equipment, the greater the need for well-trained first aid responders. Management will enlist volunteers for training by agencies such as the American Red Cross.

In case of a serious injury requiring immediate care, the local emergency services should be contacted. Some offices have company designated medical clinics. If additional non-emergency medical treatment is required, the employee should be taken to the designated clinic. If no specific clinic has been identified, the employee can be taken to the nearest medical facility or the facility of their choice.

Workers Compensation

Each state has Workers Compensation laws that guarantee certain benefits to employees who are injured or become ill because of their jobs. Any job-related injury is covered. The key is whether it was caused by the job. For example, some injuries incurred during off-duty company activities or horseplay in the office may not be covered. All injuries need to be reported to the Office Safety Coordinator immediately to determine if the injury is work related. **Any delay in reporting an injury may result in the loss of the right to compensation benefits.**

Medical Care

All medical treatment costs are paid directly by Eklund's/BCE Specialties Workers Compensation insurance carrier.

If Eklund's/BCE Specialties has designated a specific medical clinic and pharmacy to be used for obtaining treatment, the employee must use those facilities. If employees want to change doctors, they must receive authorization from the Safety Director. If employees go to a doctor or pharmacy without authorization, it is at their own expense.

If Eklund's/BCE Specialties does not have a designated medical facility or pharmacy in the area, employees can use the medical facility or pharmacy of their choice.

Payment for Lost Wages

Employees are eligible for income payments equal to a percentage of their income. Payments will continue until a physician authorizes the employee to return to work.

Accident Reports and Postings

Copies of required accident reports and investigations are maintained by the Office Safety Coordinator. A written report is maintained on each accident, injury, or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on the OSHA Log and Summary of Occupational Injuries, Form 200. Every year a summary of all reported injuries or illnesses is posted no later than February 1 for one month until March 1 on OSHA Form 200. These records are maintained for five years from the date of preparation.

A report must be made to the local OSHA office within eight hours if the injury results in death or overnight hospitalization of three or more employees.

SAFETY RULES AND STANDARDS FOR ALL EMPLOYEES

It is the policy of Eklund's/BCE Specialties to provide and maintain a safe workplace and safe working conditions. Each employee has an individual responsibility to prevent accidents. Employees are expected to perform their work in a safe manner and to familiarize themselves with the rules and standards that pertain to their jobs. The following rules and standards have been developed to ensure a safe working environment for all employees. All employees are expected to follow these rules and standards at all times.

Access to Medical and Exposure Records

Every employer must permit employees, their representatives, and OSHA officials' access to the employer's exposure and medical records. This refers to employees who will be exposed to toxic substances or other harmful physical agents.

Accident Record Keeping Requirements

Within eight hours after its occurrence, an employment accident which is fatal to one or more employees or which results in the overnight hospitalization of three or more employees shall be reported by the employer, either orally or in writing, to the nearest OSHA area director.

Records shall be kept for all accidents that result in a fatality, hospitalization, lost workdays, medical treatment, job transfer or termination, or loss of consciousness.

Records must be maintained for five years at the establishment and must be available for inspection by representatives of OSHA or a designated state agency.

Electrical

Extension cords shall be used on a temporary basis only and are not meant as a permanent outlet. Extension cords shall be the three-wire type, shall be protected from damage, and shall not be fastened with staples, hung from nails, or suspended from wires. Spliced, worn, or frayed cords shall not be used. Every extension cord should be carefully inspected before use.

Receptacles for attachment plugs shall be of the approved, concealed contact type. Where different voltages, frequencies, or types of current are supplied, receptacles shall be of such design that attachment plugs are not interchangeable.

Each breaker or disconnect switch shall be clearly marked to indicate its purpose.

Ergonomics

Furniture should be adjustable, positioned and arranged to minimize strain on all parts of the body. The glare of a computer screen should be minimized by indirect lighting or a glare screen to prevent eyestrain.

Repetitive motions can harm back, shoulders, neck, wrists, and other parts of the body, so employees shall not proceed with a task when they are physically feeling an impairment. Each employee should take periodic breaks to stretch arms, wrists, and hands.

Eye and Face Protection

Eye and face protection shall be worn when machines or operations present potential eye or face injury.

Eye and face protective equipment shall meet the requirements of ANSI Z87.1-1968, Practice for Occupational and Educational Eye and Face Protection.

Eye protection should be available for visitors to wear while in the shop area.

Fire Protection and Evacuation Plan

Be aware of the means of egress and evacuation from a job site before you become involved in the actual work. Being prepared will prevent you from panicking at the time of a fire.

Do not use the elevator in any fire situation.

Fit To Work

No one shall be permitted to work while the employee's ability or alertness is impaired by fatigue, illness, or other causes that might expose the employee or others to injury.

Anyone under the influence of intoxicating liquor or drugs, including prescription drugs that might impair motor skills and judgment, shall not be allowed on the job.

Flammable and Combustible Liquids

Approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids.

Flammable liquids shall be kept in closed containers when not actually in use.

General Duty Clause

Under section 5(a)(1) of OSHA 1970: Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are more likely to cause death or serious physical harm to his employees.

General Requirements

The employer shall initiate and maintain such programs as may be necessary to provide for frequent and regular inspections of the job site, materials, and equipment.

The employer shall instruct each employee in the recognition and avoidance of unsafe conditions and in the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

Horseplay

Horseplay, scuffling, and other acts which tend to have an adverse influence on safety or well-being of other employees are prohibited.

Housekeeping

Good housekeeping not only improves the appearance of the workplace, it also helps prevent fires, accidents, and personal injuries. Clean work areas enable you to maintain a high standard of quality in your work.

Fire extinguishers must remain accessible at all times. Means of egress should be kept clear and not blocked, well-lighted, and unlocked during work hours. Excessive combustibles (such as paper) may not be stored in work areas.

Aisles and hallways must be kept clear at all times. Workplaces are to be kept free of debris, floor storage, and electrical cords.

Adequate aisle space is to be maintained. File cabinet drawers should be opened one at a time and closed when work is finished.

Lifting

Be careful if you have to lift something. Back injuries can be prevented by following these simple Six Commandments of Lifting.

- Get a firm footing.
- Bend your knees.
- Tighten your stomach muscles.
- Lift with your legs.
- Keep the load close to your body.
- Keep your back straight.
- Get help with heavy or bulky materials to avoid dropping the load or getting thrown off balance.
- Have just one person give commands when team lifting big loads. Before lifting, check for a clear path and have a clear view while carrying the load.

Medical Services and First Aid

The employer shall ensure the availability of medical personnel for advice and consultation on matters of occupational health.

When a medical facility is not reasonably accessible for the treatment of injured employees, a person trained to render first aid shall be available at the work site.

First aid supplies approved by the consulting physician shall be readily available.

Personal Protective Equipment

The employer is responsible for requiring the wearing of appropriate personal protective equipment in all operations where there is an exposure to hazardous conditions or where the need is indicated for using such equipment to reduce the hazards to the employees.

Employees shall wear and maintain designated protective equipment as determined by the employees' supervisor.

Safety Expectations

Report any unsafe act or condition immediately to your supervisor. If the act or condition can be easily corrected, DO IT!

Attend all required safety meetings and training sessions.

Report all work-related injuries and illnesses to the Office Safety Coordinator.

Never sacrifice safety for production; good common sense will prevent most accidents.

Signs

Make sure to pay attention to all signs. There are seven different types of signs.

- Danger
- Caution
- Exit
- Safety Instruction
- Directional
- Traffic
- Accident Prevention Tags

SAFETY RULES AND STANDARDS FOR CONSTRUCTION AND FIELD PERSONNEL

Working in the field exposes employees to additional hazards not normally found in an office environment. Additional rules and standards have been developed to provide appropriate safety awareness and protection for these employees. Employees working at construction sites must follow these additional rules and standards as well as those outlined in Section 500 of the Eklund's/BCE Specialties (non-union) Health and Safety Manual.

Awareness

Be aware of working going on around you. Keep clear of suspended loads, traffic areas, loads and traffic areas.

Read danger warnings on containers and equipment. Follow all safety precautions.

Clothing

Wear clothing suitable for weather and your work. Torn or loose clothing, cuffs, and neckwear are hazardous.

Jewelry (rings, bracelets, neck chains, etc.) should not be worn.

Wear sturdy shoes suitable for your trade and keep shoes in good condition. Approved steel-toed safety shoes are required for those employees working in the manufacturing facility and at installations. Worn and thin-sole shoes and sandals will not be worn.

Use gloves or other suitable skin protection when handling rough materials, chemicals, and hot or cold objects.

Confined Spaces

Confined spaces involve the following:

- Adequate size and configuration for employee entry.
- Limited means of entry or outlet.
- Not designed for continuous employee occupancy.
- Examples of confined spaces include tanks, vessels, silos, vaults, pits, open-topped spaces more than four feet deep, pipelines, ducts, sewers, and tunnels.

A permit is required to enter a confined space if the space includes, or potentially includes, hazards relating to atmospheric conditions such as the following:

- Toxic conditions.
- Flammable conditions.
- Asphyxiating conditions.
- Engulfing conditions.
- Has an internal construction such that an entrant could be trapped or asphyxiated by inwardly conveying walls or by a floor that slopes downward and tapers to a smaller cross section.

Confined Space Entry

When possible, work shall be done outside of a confined space.

When confined space entry is necessary, the following procedure shall be used.

- The area will be inspected by the Office Safety Coordinator or a designated representative to determine if a confined space entry permit is required.
- If a permit is required, all entry is restricted to those with permits.
- The atmosphere shall be tested by trained personnel or a qualified consultant.

- If the atmosphere is acceptable, the Office Safety Coordinator or a designated representative shall inform the employee of potential hazards and complete the Confined Space Entry Permit. Atmospheric conditions will be monitored continuously while the space is occupied.
- If the atmosphere is unacceptable, entry will not be allowed until the atmospheric conditions are acceptable.
- An entry attendant will be present at the entry position and remain in contact with the entrant for the duration of the operation.
- Entrant shall be attached to a retrieval system (retrieval line, chest or full body harness, and lifting device) or have a procedure implemented for local fire and rescue to respond.
- Upon completion of the work, the Confined Space Entry Permit shall be turned in to the Office Safety Coordinator or a designated representative for logging.

Drinking Water

An adequate supply of water shall be provided in all places of employment.

Portable drinking containers shall be capable of being tightly closed and be equipped with a tap.

The common drinking cup is prohibited.

Unused disposable cups shall be kept in a sanitary container, and a receptacle shall be provided for used cups.

Hand Tools

Employers shall not issue or permit the use of unsafe hand tools.

Wrenches shall not be used when jaws are sprung to the point that slippage occurs. Impact tools shall be kept free of mushroomed heads. The wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.

Electric power operated tools shall be either approved double insulated or be properly grounded.

Head Protection

Helmets shall be worn in any area where there is a possibility of danger of head injuries from impact, flying or falling objects, or electrical shock or burns.

Hearing Protection

Ear protective devices shall be used when sound levels exceed the levels in the following table. Plain cotton is not considered a proper ear protection device.

Duration Per Day Hours	Sound Level dBA Slow Response
8.0	90
6.0	92
4.0	95
3.0	97
2.0	100
1.5	102
1.0	105
0.5	110
0.25 or less	115

Fall Protection

When employees work twelve (12) feet or more above the floor, ground or water surface, they shall be provided and shall use a personal fall arrest system or safety net system, unless the installation or use of the fall arrest system poses a greater exposure to risk than the work being performed.

Ladders, scaffolds, cable platforms, temporary floors, safety lines, and belts may be used instead of safety nets. If no fall protection is in place, do not work in that area.

Slips, Trips, and Falls

Slips, trips, and falls are caused by the combination of FRICTION, MOMENTUM, and GRAVITY. Be sure to avoid wet spots such as oil, ice, and puddles that may be prime areas to get hurt. Also, manhole covers can be very slick. Expect the unexpected!

When entering a construction site, be sure to wear shoes or boots that have the proper heels and soles. Traction is vital to preventing a fall.

Vehicle Safety

Seat belts shall be worn in all vehicles by all occupants.

A person driving company vehicles shall have a valid driver's license for the type of vehicle driven.

Employees should not drive while under the influence of alcohol or drugs, whether illegal or prescribed. This means drugs that may adversely affect the mental or physical functional ability of the employee to safely perform his or her duties.

Operators should check the condition of the following items at least once a week.

- Brakes
- Lights
- Tires, tread, wear, and air pressure
- Wipers
- First aid kit
- Fire extinguisher

All vehicles should have a fire extinguisher of sufficient size mounted on a bracket in an accessible location.

Flammable materials should be transported only in an approved container.

A well-stocked first aid kit should be in each vehicle and stored behind the seat on the driver's side.

As few objects as possible should be carried in the compartment with personnel in order to prevent damage to life and limb in case of an accident.

Gasoline should not be hauled in the trunk of a sedan with a two-way radio under any conditions.

No vehicle should carry more than its designed load limit, and the load is to be well balanced.

All local and state highway rules and regulations should be complied with. Citations for any and all violations are the employee's responsibility and must be reported to management immediately.

Washing Facilities

The employer shall provide adequate washing facilities for employees engaged in the application of harmful substances or in operations where harmful contaminants are used.

Washing facilities shall be in close proximity of the work site and shall be equipped to remove all harmful substances.

Lockout/Tagout

A written hazardous energy control program must be used by work groups that service and maintain machines and equipment where the unexpected energization or startup of machines or equipment, or release of stored energy, could cause injury.

Exceptions to this are as follows.

- Construction, agricultural, and maritime employment.
- Oil and gas well drilling and servicing.
- Utility power generating facilities.
- Cord and plug connected electrical equipment that is unplugged when the plug is under exclusive control of the employee.

Respirator Protection

Approved respirators shall be worn at all times where work is necessary in contaminated areas. Employees will be governed by all standards of the Respirator Program in effect.

FORMS

EMPLOYEE HANDBOOK ACKNOWLEDGMENT FORM (EMPLOYER COPY)

The Employee Handbook and Health and Safety Manual describes important information about Eklund's/BCE Specialties (non-union), and I understand that I should consult my supervisor, a Vice President or the President regarding any questions not answered in the handbook. I have entered into my employment relationship with Eklund's/BCE Specialties voluntarily and acknowledge that there is no specified length of employment. Accordingly, either Eklund's/BCE Specialties or I can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described in the handbook are necessarily subject to change, I acknowledge that revisions to the handbook may occur, except to Eklund's/BCE Specialties (non-union) policy of employment-at-will. All such changes will generally be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the President of Eklund's/BCE Specialties has the ability to adopt any revisions to the policies in this handbook.

Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Employee's Signature

Date

Employee's Name (Typed or Printed)

EMPLOYER COPY: Please sign this form and turn in to Human Resources.

EMPLOYEE HANDBOOK ACKNOWLEDGMENT FORM (EMPLOYEE COPY)

The Employee Handbook and Health and Safety Manual describes important information about Eklund's/BCE Specialties, and I understand that I should consult my supervisor, a Vice President or the President regarding any questions not answered in the handbook. I have entered into my employment relationship with Eklund's/BCE Specialties voluntarily and acknowledge that there is no specified length of employment. Accordingly, either Eklund's/BCE Specialties or I can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described in the handbook are necessarily subject to change, I acknowledge that revisions to the handbook may occur, except to Eklund's/BCE Specialties policy of employment-at-will. All such changes will generally be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the President of Eklund's/BCE Specialties has the ability to adopt any revisions to the policies in this handbook.

Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Employee's Signature

Date

Employee's Name (Typed or Printed)

EMPLOYEE COPY: Please retain for your records.

Name _____

Date of Hire _____ Request Date _____

I request approval to take the following course(s) under the Tuition Reimbursement Program:**COURSE:** _____**SCHOOL:** _____**REASON FOR TAKING COURSE:** _____

_____**BEGINNING DATE:** _____**COMPLETION DATE:** _____**CLASS SCHEDULE:** _____

I understand that I must pay the cost of tuition and fees in advance, and upon successful completion of the course(s), Eklund's will reimburse me at the appropriate rate as outlined in the policy. I understand that I must furnish a grade report and receipts of expenses before reimbursement will be made. I also understand that if I leave the company within 12 months of reimbursement, I may be required to repay any amount received and such amount may be deducted from any final payments due to me.

Employee's Signature Date_____
Supervisor Signature Date_____
Executive Signature Date***Original to Employee File, Copy to Accounting & Employee***

Name _____

Request Date for Reimbursement _____

I have completed the course(s) and submit my expenses and grade report for reimbursement (receipts attached):

COURSE: _____

GRADE: _____

TYPE OF EXPENSE: _____

COST: _____

Employee's Signature Date

Supervisor Signature Date

Executive Signature Date

Original to Employee File, Copy to Accounting & Employee