

POLICY NO: 100

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

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APPROVED: EF



## **ARGOS USA AT-WILL EMPLOYER STATEMENT**

Argos USA is an "at-will employer." As such, any employee can terminate the employment relationship with the Company, and likewise, the Company can terminate the employment relationship with any employee at any time with or without notice or cause, provided that employment terminations do not violate any laws or personal employment contracts.

Neither Company Policies nor any other Company communication (verbal or written) should be considered as an employment contract or a contractual obligation between the Company and its employees.

No employee, except the US, Chief Executive has the authority to enter into any employment contract for any specified period of time or to make any agreement contrary to the above statements.

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## **ARGOS USA EEO NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

### **Purpose**

The purpose of this policy is to establish a uniform policy and procedure with respect to non-discrimination of job applicants and employees.

### **Scope**

This policy applies to all employees at all locations of Argos USA.

### **Policy**

Argos USA is an Equal Opportunity Employer. It is the policy of the Company that employment decisions will be made without regard to race, color, sex, age, religion, national origin, genetic information, veteran status, disability, or any other protected status under federal, state, or local law where the qualified individual can perform all the essential functions of the job.

The Company will make reasonable accommodations for qualified individuals with known disabilities unless doing so would fundamentally alter the nature or operation of a job or result in an undue hardship on the Company.

All personnel actions, such as compensation, benefits, promotion, transfer, layoff, return from layoff, Company-sponsored training, tuition assistance, and Company-sponsored social and recreational programs, will be based on the principles of equal employment opportunity (EEO).

Breach of this EEO policy by any employee will be grounds for disciplinary action. Employees and applicants are protected from coercion, harassment, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation.

It is illegal and against the policy of the Company for any employee, male or female, to sexually harass another employee by (a) making unwelcome sexual advances, making requests for sexual favors, or making other verbal or physical conduct of a sexual nature a condition of any employee's continued employment, or (b) making submission to, or rejection of, such conduct the basis for employment decisions affecting the employee, or (c) creating an intimidating, hostile, or offensive working environment by such conduct.

It is also illegal and against the policy of the Company for any employee to harass another employee on the basis of race, sex, color, age, religion, national origin, veteran status, disability, or other protected status.

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Any employee who believes he or she has been subjected to harassment, discrimination, or retaliation at work by anyone, including supervisors, coworkers, customers, or visitors, is strongly encouraged to promptly report the matter to his or her immediate supervisor or manager through the Company's Problem Resolution Procedure Policy #435. If the immediate supervisor or manager is involved, the employee should report the matter to the Human Resources Department or to any other Argos USA official. It is important that employees report such incidents, because without employees' assistance, violations may go undetected.

In most cases, the Human Resources Department will be responsible for investigating complaints. Appropriate privacy safeguards will be applied and confidentiality will be maintained to the extent allowed by investigation of the situation.

Argos USA will take appropriate corrective action to remedy violations of this policy. No employee who brings a harassment complaint to the attention of the Company will suffer any retaliation or adverse employment decisions as a consequence. Any harassment, discrimination, or retaliation is considered to be a major violation of Company policy and will be dealt with accordingly, up to and including termination of employment, depending on the severity of the violation. It is also a violation of Company policy to file a false accusation of harassment, discrimination, or retaliation or to provide false or misleading information or obstruct the Company's investigation of such claims. Such improper conduct may also result in discipline, up to and including termination of employment.

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## **ARGOS USA POSITION CONCERNING UNIONS**

### **Purpose**

The purpose of this policy is to state our position concerning unions.

### **Scope**

This policy applies to all business units of Argos USA.

### **Policy**

Although the company recognizes and respects the right of all employees to join a labor organization in accordance to federal and state laws, it is the belief at Argos USA that problems between employees and management can be worked out satisfactorily through honest and frank discussions in an atmosphere of mutual trust, respect, and cooperation. Our workplace environment offers employees full communication with management at all levels.

Argos USA management believes that unions are essentially unnecessary in our Company. We firmly believe that all of us can make better progress and provide greater job security for ourselves and our families without disruptive influences of outside parties, including unions.

We encourage any employee who is approached by a union organizer to sign a "union card" or "union petition" to be very sure about what he or she is being asked to sign. Signing these type of documents are legally binding, therefore, before signing a union authorization document, we encourage employees to ask and direct any questions to his or her supervisor, local manager, or the Human Resources Department.

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## **ARGOS USA NON-RETALIATION**

### **Purpose**

The purpose of this policy is to establish a uniform policy and procedure with respect to non-retaliation against another employee who has exercised a legal right, opposed or participated in investigating an unlawful or unethical practice, or otherwise engaged in any legally protected activity.

### **Scope**

This policy applies to all employees of Argos USA.

### **Policy**

Argos USA is a respected leader in the building materials industry due in part to the commitment of the Company and its employees towards compliance with government regulation and adherence to the highest level of ethical standards. The company's continued success depends on our commitment to high standards and principles of business and personal conduct. This policy helps create an environment in which employees can, in good faith, report suspected violations of the Argos USA Code of Conduct, the law, improper conduct, or Company policy or procedure, participate in investigations into such matters, or otherwise engage in any legally protected activity without fear of retribution or retaliation.

It is strictly prohibited for any employee to take any adverse action or retaliation against another employee who has exercised a legal right, opposed or participated in the investigation of an alleged unlawful or unethical practice, or otherwise engaged in any legally protected activity. This policy should not be construed, however, as preventing, limiting, or delaying the Company from taking disciplinary action against any individual, up to and including termination, in circumstances (such as those involving issues of performance, conduct, attitude, etc.) where the Company deems disciplinary action appropriate.

Employees who feel they are being retaliated against in violation of this policy should report this conduct immediately to their manager or the Human Resources Department. Matters raised under this policy will be kept confidential to the maximum extent possible, unless confidentiality prevents the full and complete investigation of a particular matter or impairs other legitimate business concern.

Failure by an employee to observe this policy may constitute a breach of terms and conditions of employment and subject such employee to disciplinary action, up to and including termination of employment.