

POLICY NO: 300

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PAGE: 1 OF 2

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ARGOS USA PROCEDURE FOR HANDLING HARASSMENT COMPLAINTS

Purpose

The following guidelines establish a definite policy and procedure concerning the handling of a harassment complaint.

Scope

This policy applies to all Business Units of Argos USA.

Policy

All complaints will be handled in a timely and confidential manner by the Human Resources Director responsible for HR in the Business Unit. Information concerning the complaint will not be released or discussed with anyone who is not involved with the investigation.

The Company's system for resolving complaints is available to employees without fear of retaliation. An employee who believes retaliation has resulted from the reporting of a harassment complaint should immediately report this to the highest level manager at the work site (generally the Operations Manager, etc.) or the Human Resources Department.

Procedure

When a supervisor is informed of a possible harassment complaint, he/she should notify the Human Resources Department immediately.

Do not ignore any complaint – Any harassment complaint by an employee should be handled as an official notification of possible harassment. A complaint should not be disregarded because the complaining employee is uncomfortable with the investigation. All complaints must be reported/investigated by the Human Resources Department.

Investigation

Recognizing the sensitivity of the issue, a Human Resources Representative or designee will hold meetings with the parties involved with the matter. All complaints will be investigated thoroughly and without prejudice. All parties involved in the complaint will be given the opportunity to give their views.

Employees will not be pressured to drop or withdraw a harassment complaint. If the employee insists on withdrawing his/her complaint or preventing an investigation, the employee must state his/her intent or request in writing and forward it to the Human Resources Department.

POLICY NO: 300

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 2 OF 2

APPROVED: EF



Disciplinary Action

When the investigation has been completed:

If no evidence of harassment has been found, the Company's position will be explained to the complaining party. It will be emphasized that the Company intends to prevent harassment in the work place at all times, and that the Company has a harassment policy in effect to prevent it.

If evidence of harassment is found, appropriate disciplinary action, up to and including discharge will be taken under the Company's progressive discipline program as detailed in the counseling and discipline policy. The Company may accelerate the schedule below, depending on the severity of the harassment.

Definitions

Harassment includes verbal or physical conduct that denigrates or shows hostility toward an individual because of his/her race, color, religion, sex (including same sex), pregnancy, national origin, citizenship, age, disability, veterans' status, or other protected status, and that creates an intimidating, hostile, or offensive working environment for any employee regardless of whether or not that employee is a member of a protected status.

Harassment may also include, but is not necessarily limited to, photos/images, symbols, epithets, slurs, jokes, or other verbal or physical conduct relating to an individual's race, sex, color, religion, gender, national origin, age, disability or other protected status. Harassment may also include bullying, threatening, intimidating, use of vulgar or offensive language or behaviors towards or about any employee, regardless of whether or not that employee is a member of a protected status group.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that creates an offensive or hostile work atmosphere.

Behavior of this nature is unprofessional and can distract employees from performing their job functions. Therefore, any form of harassment, including sexual harassment, will not be tolerated. (Such behavior by vendors and other non-employees who have reason to be on Company premises or who otherwise have dealings with our employees also will not be tolerated.)

POLICY NO: 305

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 1 OF 2

APPROVED: EF



ARGOS USA PAYROLL PROCEDURES

Purpose

This policy communicates the payroll procedures with regard to payday and pay periods, early pay requests and wage deductions.

Scope

This policy applies to all employees of Argos USA.

Policy

Payday and Pay Periods

1. Hourly employees are paid weekly and salaried employees are paid semi-monthly. Pay week is defined as Monday through Sunday for hourly employees.
2. All direct deposit notifications are available online for all employees. Any "Live" checks for employees who have not yet set up direct deposit payments, will be sent to the employee's supervisor at his/her home plant. Please contact the payroll department for questions or to set up "Direct Deposit" payments.

Early Pay Requests

Early Pay Requests will not be honored except in the case of an **extreme** emergency. In the event of such an emergency (such as a death in the immediate family, etc.) an employee may obtain his or her pay after receiving authorization from the responsible Manager at the employee's home business unit or department.

Wage Deductions

1. The Company makes deductions from each employee's paycheck in accordance with various laws (e.g. deductions from Social Security and federal and state withholding taxes, etc.). To change federal or state withholding deductions, an employee must complete a new W-4 form which is available from the Human Resources.
2. In addition, employees may choose to participate in various Company benefit or other payroll deduction plans which require the employee's written authorization, except in the case where the deduction is for time not worked (i.e. "docking") or legally required "garnishments".

POLICY NO: 305

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 2 OF 2

APPROVED: EF



3. Managers and supervisors who are uncertain about whether a deduction is proper should seek guidance from Human Resources.
4. An employees who believes that an improper deduction was made, may raise this concern to the Human Resources Department. Every effort will be made to investigate, resolve promptly and communicate the results of any investigation of such a concern. The Company will reimburse the affected employee for any deduction it deems improper.

POLICY NO: 310

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 1 OF 4

APPROVED: EF



RETURN TO WORK PROCEDURES

Purpose

This policy outlines the processes to be followed when employees return to work following an extended absence due to a personal illness or work-related injury.

Scope

It is the responsibility of each Division and Department Head to fairly and consistently apply this policy in accordance with: (i) federal, state, and local laws (particularly the Americans with Disabilities Act, the Family and Medical Leave Act, federal and state Department of Transportation Regulations, and state Workers' Compensation laws) and (ii) business needs.

This policy applies to all employees of Argos USA. Unless otherwise noted, this policy applies only to those personal absences due to a personal illness or injury that extend to eight (8) or more consecutive days. Returning to work from an absence of shorter duration will be handled by the attendance program.

Policy

RETURN TO WORK GUIDELINES

1) Notification

An employee shall be required to notify his or her supervisor of the intent to return to work following time off for an approved leave of absence due to personal illness or work-related injury, including Worker's Compensation and Salary Continuation or Short Term Disability qualifying events. Employees who do not return to work or coordinate another return to work date with their supervisor within 72 hours (3 workdays) after being released to return to work by their health care provider will be considered by the Company to have abandoned their job.

2) Medical Certification

For all hourly production employees, the Company may require the employee to take a physical exam, at the Company's expense, to make a determination of the employee's ability to perform the essential functions of his or her position before making a return to work decision. Return to work status must be supported by an adequate medical certification following a work related injury. A medical certification must include a review and assessment of the employee's abilities to perform the essential function requirements of his or her position. For all salaried employees, the attending health care provider's release to return to work will usually be adequate. However the Company reserves the right to require a second opinion examination (see paragraph 3 below) at the Company's expense to determine the employee's ability to perform the essential functions of the position.

POLICY NO: 310

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 2 OF 4

APPROVED: EF



At the attending physician's request, the Company will provide to the employee or physician an essential functions list to be considered for the purposes of developing a medical return to work opinion. In cases where the employee's ability to perform the essential functions of the job is restricted or impaired, an attempt will be made to work out a possible accommodation to satisfy the requirements of the Americans With Disabilities Act, if applicable.

3) Second Medical Opinions

The Company may require the employee to take a physical exam at the Company's expense if the Company disagrees with the initial medical certification or feels additional medical documentation is required to make a determination of the employee's ability to perform the essential functions of his or her position before making a return to work decision. If the first and second opinions conflict, the Company may send the employee, at the Company's expense, for a third medical opinion. The third medical opinion will be binding on both the Company and the employee. In cases where the employee is unable to perform the essential functions of the job, an attempt will be made to work out a possible accommodation to satisfy the requirements of the Americans with Disabilities Act, if applicable.

4) Substance Testing

In addition to medical certification, and prior to an employee being released for return to duty, drug and alcohol testing may be required for all employees returning to work or modified duty after an absence of 8 or more consecutive days due to a personal illness or injury. Local Management has the discretion to require employees who are returning from absences of shorter duration to be required to also submit to substance testing. Drug and alcohol testing will be performed in accordance with the procedures detailed in the Company's Drug and Alcohol Policy.

Employees who fail to show up for a scheduled substance test without a reasonable and substantiated explanation acceptable to Management, or refuse to produce a sample on the day and time requested (after efforts have been made to assist the employee in providing a sufficient sample), will be subject to termination of employment.

5) Pregnancy/Maternity Leave Exclusion

Employees returning to work from a pregnancy or maternity-related leave of absence are specifically excluded from this Policy's substance testing requirements, unless employed in a safety-sensitive position. All other provisions of this Policy, however, can apply.

An employee who is on authorized Family and Medical Leave due to a personal injury or illness, and who returns to work within 12 weeks from the date of the onset of his or her illness or injury, will be returned to the same position previously held, provided the position has not been eliminated through reorganization or "down-sizing."

POLICY NO: 310

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 3 OF 4

APPROVED: EF



Employees who return to work within 180 days of the onset of their illness or injury may be returned to an available position that, in the judgment of Management, best matches his or her skills and abilities. If upon their return, no position is available for which they are qualified, with or without a reasonable accommodation, the returning employee will be laid off.

Employees who are not able to return to work within 180 days from the date of their illness or injury, with or without a reasonable accommodation, will continue to be shown as being on a Medical Leave of Absence without pay or benefits unless the Company becomes aware that the employee has taken other employment. If the employee has taken other employment, the employee's status will be changed to "Terminated."

MODIFIED DUTY

Please refer to the Company's Modified Duty Policy #565.

ACCOMMODATION OF DISABILITIES

Please refer to the Company's Accommodation for Disabilities #560.

RATES OF PAY, SERVICE TIME, AND FRINGE BENEFITS

Reinstatement of an employee returning to work from injury or illness will be governed by the following pay practices:

1. An employee returning to the same job will be paid the rate in effect at the time of his or her injury or illness or the comparable rate if a general increase has been given.
2. If returning to a lower rated job, the employee's wage rate will not exceed the top rate of the classification.
3. If the employee returns to the same job and the employee was due a merit review within 30 days of the injury or illness, the employee will be reviewed 30 days after his or her return. If, however, the employee returns to a different job, the employee will be reviewed on the regular established schedule.
4. Vacation will not accrue during periods of medical leave in excess of 30 days. Eligibility for vacation in the year of the employee's return to work will be determined by local Management practice.
5. An employee not will be eligible for paid holidays during periods of unpaid leaves of absence pursuant to the Company's Holiday Pay Policy.
6. Workplace service time will not accrue during periods of medical leave in excess of 30 days. If reassigned to a new position, the service time practices of the employee's new work organization will apply.

POLICY NO: 310

EFFECTIVE DATE: 1/1/2013

REVISION DATE: 10/1/2012

PAGE: 4 OF 4

APPROVED: EF



BENEFIT PLAN PARTICIPATION

Eligibility for, and continued participation in, the Company's employee savings, health and welfare, and disability plans are governed by specific rules established for each plan.

Employees who are on, or returning from, an extended leave of absence due to illness or injury should consult with the Human Resources Department for specific details on each plan.