



Employee Handbook

January 1, 2025

Letter from the president

Welcome to Work 'n Leisure Products (WNL Products)!

We are extremely pleased that you have joined us and I hope that you find your association with the company to be an enriching and engaging work experience.

As an employee of WNL Products, the importance of your contribution cannot be overstated. Customer Satisfaction is one of our main goals at WNL Products, and you are an important part of this goal, for your work directly influences our company's success and reputation.

This handbook is your guide to our policies. Of course, this handbook cannot cover every eventuality that may arise. Its purpose is to summarize or highlight current policies and practices for staff members. All policies are subject to change. If you have questions or would like more information, your manager is your most immediate source.

We invite you to share with us your questions and thoughts about work life at WNL Products. Please feel free to call upon any member of the Management Team or a human resources representative to assist you in any matter that concerns you and your job at WNL Products.

Sincerely,



Wayne Eddy, President

Table of Contents

The Employee Handbook	8
Receipt of Employee Handbook & Employment at Will Statement	9
Our Company	10
Company History	10
Company Mission	10
Commitment to Employees.....	10
Commitment to Our Customers	10
Total Quality Management.....	11
Continuity of Policies - Right to Change or Discontinue	11
Employment Policies	12
Employment at Will	12
Recruitment.....	12
Background Checks.....	12
Immigration Law Compliance and the I-9 Form.....	12
Equal Opportunity	13
Disability Accommodation.....	13
Sexual Harassment.....	14
Sexual Harassment Defined.....	14
Reporting Sexual Harassment.....	14
Retaliation	15
Pregnant Workers Fairness	15
New Hire	16
Introductory Period.....	16
Rehire.....	16
Relatives	16
Employee Orientation	16
Confidentiality of Company Information	17
Conflict of Interest/Code of Ethics	17
Care of Equipment	17
Personal Property	17
Medical Evaluations and Interviews.....	18
Grievance Procedure	18
Gratuities to Customer or Supplier Representation	18
Contact with the Media	18
Termination of Employment	19
Termination of Employment.....	19
Termination Overview	19
Voluntary Termination.....	19
Voluntary Termination Processing Procedures	19
Final Paycheck – Voluntary Termination	20
Involuntary Termination	20
Dismissal	20
Layoff.....	20
Involuntary Termination Processing Procedures.....	20
Final Paycheck – Involuntary Termination.....	20
Employment Status & Records	22
Anniversary Date	22
Reinstatement.....	22
Employment Status and Classification	22
Employment Status.....	22

Employment Classification.....	22
Access to Personnel Files.....	23
Notice Requirement.....	23
Reference Check Requests.....	23
Job Descriptions.....	23
Pay Equity.....	23
Change in Personal Data.....	24
Performance Management	25
Professional Development.....	25
Performance Review.....	25
Merit Pay Increase.....	25
Performance Improvement.....	26
Corrective Counseling.....	26
Health and Welfare Benefits	28
Health Insurance.....	28
Health Insurance Options.....	28
Health Insurance for Benefits-eligible Employees.....	28
Health Insurance for Non-Benefits-eligible Employees.....	29
Health Insurance Waiver Forms.....	29
Health Benefits Continuation (Mini-COBRA).....	29
Dental Insurance.....	29
Overview.....	29
Eligibility.....	29
Enrollment.....	29
Effective Date.....	30
Participation and Plan Details.....	30
Cost.....	30
Loss of Coverage.....	30
Short-term Disability Insurance.....	30
Overview.....	30
Eligibility.....	30
Enrollment.....	31
Effective Date.....	31
STD Payment.....	31
Getting Paid.....	31
Cost.....	31
Participation and Plan Details.....	31
Long-term Disability Insurance.....	31
Overview.....	31
Eligibility.....	31
Enrollment.....	31
Effective Date.....	31
LTD Payment.....	31
Getting Paid.....	32
Survivor Benefit.....	32
Own Occupation Period.....	32
Cost.....	32
Participation and Plan Details.....	32
Basic Life Insurance, Accidental Death and Dismemberment, Dependent Life Insurance.....	32
Overview.....	32
Eligibility.....	32
Enrollment.....	32
Effective Date.....	32
Life Insurance, AD&D, and Dependent Life Insurance Payments.....	33
Benefit Reduction Schedule.....	33

Beneficiary	33
Cost.....	33
Participation and Plan Details.....	33
Supplemental Life Insurance and Supplemental Dependent Life Insurance.....	33
Overview	33
Eligibility	34
Enrollment.....	34
Effective Date	34
Supplemental Life Insurance and Dependent Life Insurance Payments	34
Beneficiary	34
Cost.....	34
Participation and Plan Details.....	34
Workers' Compensation Insurance.....	34
401(k) Plan.....	35
Overview	35
Eligibility	35
Enrollment.....	35
Effective Date	35
Contribution Limits	35
Employer Matching Contribution	35
Time Off Benefits	36
Paid Time Off	36
Policy Overview	36
Eligibility	36
Earning PTO	36
Accrual of PTO Schedule	36
Requesting and Taking PTO	37
Negative PTO Balance	37
Individual Time Off Reports	Error! Bookmark not defined.
Holidays During PTO Time Off	37
PTO Carryover.....	37
Cashing In PTO	37
Forfeiting PTO Time	38
Changing Employment Status	38
Leaving the Company.....	38
Holidays	39
Observed Holidays	39
Weekend Holidays.....	39
Eligibility for Holiday Pay	39
Minimal Staff Holidays	39
Holidays During Vacation Time	39
Religious Holidays	40
Voting Leave	40
Jury Duty Leave	40
Witness Leave	40
Military Service Leave.....	40
Bereavement Leave.....	41
Medical Leave of Absence.....	41
Parental Leave.....	42
Military Leave.....	42
Memberships, Travel, and Expenses	44
Employee-Incurred Expenses and Reimbursement.....	44
Mileage Reimbursement.....	44
Travel Reimbursement.....	44
Payroll	45

Payroll Deductions	45
Mandatory Payroll Deductions	45
Optional Payroll Deductions	45
Other Payroll Deductions	45
Timekeeping	46
Non-Exempt Timekeeping	46
Exempt Timekeeping	46
Payday	46
Overtime Compensation	46
Workplace Guidelines	47
Code of Conduct	47
Customer and Public Relations	47
Workday	47
Meal and Rest Periods	47
Contact with the Company	48
On the Job Training	48
Parking	48
Non-Business or Social Visits	48
Personal Telephone Use	48
Employee Privacy	48
Attendance and Punctuality	49
Dress Code and Personal Hygiene	49
Housekeeping	49
Substance Abuse	49
Solicitation	50
Workplace Safety and Security	51
Employee Safety	51
Injured On the Job	51
Workplace Search Policy	52
Smoking	52
Emergency Closings	52
Workplace Violence	53
Workplace Violence Defined	53
Reporting Workplace Violence	53
Violation of the Policy	53
Concealed Weapons	53
Workplace Emergency Instructions	53
E-Policies	55
General Principles	55
Information Technology Resources Defined	55
Permitted General Access	55
User Responsibilities	55
Privacy	55
Sharing of Access	55
Prohibited Use	56
General e-Policies	56
Blogging and Instant Messaging (Chat) Policy	56
Other Prohibited Uses:	56
Acceptable E-mail Usage	56
E-mail Passwords	56
Forwarding E-mails	57
Confidential and Sensitive Information via E-mail	57
Management Access to Technology Resources	57
Information Assets are Company Property	57
Employee Privacy	57

Monitoring	57
Passwords	58
Data Collection by the Company	58
Telephone Use and Voicemail.....	58
Electronic Mail	58
Desktop Facsimile Use	58
Document Use	58
Internet Use	58
Deleted Information	58

The Employee Handbook

The Employee Handbook contains information about the employment policies and practices of WNL Products. Each employee is expected to read this handbook carefully, as it is a valuable resource for understanding your job and the company.

The policies and procedures in this handbook are not intended to be contractual commitments by WNL Products and employees shall not construe them as such.

The policies and procedures are intended to be guides to management and are merely descriptive to the suggested procedures to be followed. WNL Products reserves the right to revoke, change or supplement guidelines and policies at any time, without notice, to conduct its work in a manner that is beneficial to the employees and to the company. Any deletions, revisions, or additions must be in writing and must be signed by the president of WNL Products. No oral statements or representations can change the provisions of the Employee Handbook.

Neither this handbook nor any of the policies within are intended as a guarantee of continuity of benefits or rights. No permanent employment or employment for any term is intended or can be implied from any statements in this manual.

This Employee Handbook supersedes and replaces all prior Employee Handbooks and inconsistent verbal or written policy statements.

Receipt of Employee Handbook & Employment at Will Statement

I acknowledge that I have received my copy of the WNL Products Employee Handbook that outlines the policies, practices, and benefit guidelines of the company, and I have read, and I understand the information contained in the manual.

I understand that the employee handbook sets forth the terms and conditions of my employment, as well as the duties, responsibilities, and obligations of my employment with the company. I understand and agree that it is my responsibility to read the employee handbook and to abide by the rules, policies, and standards set forth in the handbook.

I also acknowledge that my employment with WNL Products is not for a specified period of time and can be terminated at any time for any reason, with or without cause or notice, by me or by the company. I acknowledge that no oral or written statements or representations regarding my employment can alter the foregoing. I also acknowledge that no manager or employee has the authority to enter into an employment agreement – express or implied – providing employment other than at-will.

I also acknowledge that, except for the policy of at-will employment, the company reserves the right to revise, delete, and add to the provisions of this employee handbook. All such revisions, deletions, or additions must be in writing and must be signed by the president of the company. No oral statements or representations can change the provisions of this employee handbook. I also acknowledge that, except for the policy of at-will employment, terms and conditions of employment with the company may be modified at the sole discretion of the company, with or without cause or notice, at any time. No implied contract concerning any employment-related decision, term of employment, or condition of employment can be established by any other statement, conduct, policy, or practice.

I understand that the foregoing agreement concerning my at-will employment status and the company's right to determine and modify the terms and conditions of employment is the sole and entire agreement between me and WNL Products concerning the duration of my employment, the circumstances under which my employment may be terminated, and the circumstances under which the terms and conditions of my employment may be terminated, and the circumstances under which the terms and conditions of my employment may change. I further understand that this agreement supersedes all prior agreements, understandings, and representations concerning my employment with the company.

If I have any questions regarding the content or interpretation of this employee handbook, I will bring them to the attention of the business manager.

Employee's Signature

Date

Name [Please Print]

Our Company

Company History

Work 'n Leisure Products, Inc. was founded in 1994 by Wayne Eddy. The company started as a supplier of personal safety equipment, such as back belts, work gloves, eye and ear protection, and more. As the company grew, so did its product offerings. From the humble beginnings of working out of a residence basement, and with only two employees, the need soon became apparent for more employees, as well as a true office and warehouse space. The company was moved to Granite Park in Milford, Massachusetts, in 1996.

WNL Products began to branch out into First Aid Supplies – selling first aid kits and equipment to American Red Cross chapters, as well as other first aid organizations such as the American Heart Association and CPR training organizations. The office and warehouse space were again too small after this growth, so the company moved next door to a larger space, while adding even more employees.

In 2007, WNL Products again found itself in need of even more space, so another move brought the company to a location at Hopping Brook Park in Holliston, MA.

Most recently, in December of 2014, WNL Products created its own new space in Hopping Brook Park, at 275 Hopping Brook Road.

Company Mission

WNL Products' mission is to provide customers with the finest-quality products in a manner that is more efficient, economical, and profitable than our competitors. Future company growth and profitability will be the result of practicing total quality management and maximizing customer satisfaction. Satisfied customers will continue to do business with us and recommend us to others. WNL Products' employees play an important and valued role in customer satisfaction, as their work directly influences our company's excellent reputation.

Commitment to Employees

WNL Products recognizes that its staff is its most important strength, and therefore is committed to providing an excellent work environment, opportunities for self-development and growth, and monetary and non-monetary rewards for hard work and commitment.

We take great pride and care in the recruitment and selection of our employees. You have been selected because of what you can bring to this company. You represent the company, and it is up to you to take this responsibility seriously. Our company exists because of the joint efforts of its employees. Do not underestimate your contribution to our success.

Commitment to Our Customers

A great many people outside of our business invest their time, money, and faith in us. These are our customers, and they are the main component of our success. Our customers determine how fast we grow, how many people we employ, how many and what types of products we produce, and the profit we make.

A lot of hard work and commitment goes into bringing in new customers. We must continue that hard work to earn their confidence and loyalty. We must also retain our current customers while expanding our customer base. Customer retention is paramount to our success. In order to retain customers, we need to ensure that our excellent service continues by always offering our customers the best possible value and quality. Working together and working well provides us with the best

opportunity to ensure excellent service, a bright future, and the most important commodity, an excellent reputation.

Total Quality Management

Total Quality Management (TQM) is a company-wide commitment to develop processes that achieve high-quality products, excellent services, and customer satisfaction. TQM is also an effort to continually improve upon everything that we do. WNL Products is committed to TQM. Our customers benefit from our TQM efforts, and so do our employees.

All WNL Products employees are expected to participate in TQM. You can do your part by practicing excellence in all that you always do, and by making suggestions and recommendations in any area that you feel needs improvement.

Continuity of Policies - Right to Change or Discontinue

To preserve the ability to meet company needs under changing conditions, WNL Products may modify, augment, delete, or revoke any and all policies, procedures, practices, and statements contained in this handbook at any time without notice. Such changes shall be effective immediately upon approval by management unless otherwise stated.

No policy within this handbook is intended as a guarantee of continuity of benefits or rights. No permanent employment or employment for any term is intended or can be implied by statements in this handbook.

Employment Policies

Employment at Will

WNL Products is an At-Will Employer. This means that regardless of any provision in this handbook, either you or the company may terminate the employment relationship at any time, for any reason, with or without cause or notice.

Nothing in this employee handbook, or in any document or statement, written or oral, shall limit the right to terminate employment at will. No officer, employee, or representative of the company is authorized to enter into an agreement – express or implied – with any employee for employment other than at-will.

Recruitment

WNL Products provides equal employment opportunity to all applicants based on demonstrated ability, experience, and training.

As positions become available within the company, prior to outside recruitment, the human resources representative and hiring manager shall determine the availability of qualified candidates within the company. Recruitment may be conducted through schools, employment agencies, and company advertising.

Contact the human resources representative to discuss the most appropriate method of recruitment.

Background Checks

WNL Products desires to provide its staff and customers with a reasonably safe and secure environment, and to provide reasonable protection for the financial and material assets of the company.

As a condition of employment, applicants offered sensitive positions, and current employees transferring into sensitive positions, may be required to sign release of information forms authorizing WNL Products to make a thorough background check. This information is necessary to determine whether the applicant or employee has the required skills or competencies, has a history of safe driving, and/or has no relevant criminal history or offenses that may jeopardize the safety or welfare of the company's operations, employees, or customers.

Immigration Law Compliance and the I-9 Form

WNL Products is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate based on citizenship or national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9, which is the form that is required by the Department of Homeland Security - U.S. Citizenship and Immigration Services to document eligibility for employment in the United States.

All employees, citizens and non-citizens, hired after November 6, 1986, must complete Section 1 of this form within three (3) days of the date of hire, and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with WNL Products within the past three years, or if their previous I-9 is no longer retained or valid.

The Business Department will complete Form I-9 after examining the employee's documentation of identity and employment eligibility. The Business Department will also check the validity of Social

Security numbers used for Form I-9 documentation. Each document examined will be photocopied, and the copy will be maintained in the employee's personnel file folder.

If an employee is authorized to work in this country for a limited time period, the individual will be required to submit proof of renewed employment eligibility prior to expiration of that period to remain employed by the company.

If Form I-9 is not filled out within three days of the date of hire, or if any documentation used for the Form I-9 is not valid, the offer of employment will be withdrawn or employment will be immediately terminated.

Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

Equal Opportunity

WNL Products' policy is to select the best-qualified person for each position in the organization.

No employee of the company will discriminate against an applicant for employment, or a fellow employee because of race, creed, color, religion, sex, national origin, ancestry, age, or other physical or mental disability. No employee of the company will discriminate against any applicant or fellow employee because of the person's veteran status.

This policy applies to all employment practices and personnel actions including advertising, recruitment, testing, screening, hiring, selection for training, upgrading, transfer, demotion, layoff, termination, rates of pay, and other forms of compensation or overtime.

Further, race, color, religious creed, national origin, sex, pregnancy, sexual orientation, ancestry, age, veteran status, genetic information, handicap, admission to mental facility, and military membership are protected classes in Massachusetts.

You may discuss equal employment opportunity-related questions with any member of management or human resources.

Disability Accommodation

WNL Products is committed to complying fully with the Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. All employment decisions are based on the merit of the situation in accordance with defined criteria, not the disability of the individual.

Hiring procedures have been reviewed and provide people with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the essential duties of the position.

WNL Products will provide reasonable accommodation for the known disabilities of any employee, if such accommodation is required in order for the employee to perform the essential functions of the employee's job, and the accommodation would not cause undue hardship. In general, it is your responsibility to notify your manager of the need for accommodation. Upon doing so, your manager may ask you for your input or the type of accommodation you believe may be necessary for the functional limitations caused by your disability. Also, when appropriate, we may need your permission to obtain additional information from your physician or other medical or rehabilitation professionals.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation), as well as equal treatment in job assignments, classifications, organizational structures, position descriptions, and lines of progression. Leave of all types will be available to all employees on an equal basis.

WNL Products is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. WNL Products will follow any state or local law that provides individuals with disabilities with greater protection than the ADA.

This policy is neither exhaustive nor exclusive. WNL Products is committed to taking all other actions necessary to ensure equal employment opportunities for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

Sexual Harassment

WNL Products will not, under any circumstances, condone or tolerate conduct which may constitute sexual harassment on the part of its management, supervisors or non-management personnel. It is our policy that all employees have the right to work in an environment free from any type of illegal discrimination, including sexual harassment. Harassment of third parties by our employees is also prohibited.

Any employee found to have engaged in such conduct will be subject to immediate discipline up to and including discharge.

Sexual Harassment Defined

Sexual harassment is defined as:

- Making submission to unwelcome sexual advances or requests for sexual favors a term or condition of employment.
- Basing an employment decision on submission or rejection by an employee of unwelcome sexual advances, requests for sexual favors or verbal or physical contact of a sexual nature.
- Creating an intimidating, hostile, humiliating, or sexually offensive working environment or atmosphere either by:
 - a. Verbal actions, including calling employees by terms of endearment; using vulgar, kidding or demeaning language; or
 - b. Physical conduct, which interferes with an employee's work performance.

Sexual harassment includes:

- unwelcome sexual advances
- requests for sexual favors
- verbal harassment such as epithets, derogatory comments, or slurs
- uninvited physical touching or harassment, such as assault, impeding or blocking movement, or any physical interference with normal work conduct
- visual harassment, such as derogatory posters, cartoons, or drawings. This includes the dissemination of sexually explicit voice mail, e-mail, graphics, downloaded material or websites in the workplace.

Reporting Sexual Harassment

Any individual who believes he or she is subject to sexual harassment, or believes sexual harassment may be taking place whether it directly affects that individual or not, must report the circumstances as soon as possible in accordance with the following procedure:

1. Any employee who believes they has been sexually harassed or retaliated against for complaining of sexual harassment should report the situation immediately to one of the following:

Wayne Eddy
275 Hopping Brook Road., Holliston, MA 01746
(508) 893-0939
wayne@wnlproducts.com

Audrey Bennett
275 Hopping Brook Road., Holliston, MA 01746
(508) 893-0939
audrey@wnlproducts.com

Your supervisor

2. The company will investigate every reported incident immediately.
3. The company will conduct all investigations in a discrete manner.
4. The reporting employee and any employee participating in any investigation under this policy have the company's assurance that no reprisals will be taken because of a sexual harassment complaint made in good faith.

We strongly encourage employees to file a complaint of sexual harassment using our company's complaint procedure. However, using our internal complaint process does not prohibit you from contacting one of the following agencies:

- Massachusetts Commission Against Discrimination

Boston Office
One Ashburton Place
Room 601
Boston, MA 02108-1518
(617) 994-6000

Springfield Office
436 Dwight Street
Room 220
Springfield, MA 01103
(413) 739-2145

- EQUAL Employment Opportunity Commission

John F. Kennedy Federal Building
Government Center
4th Floor, Room 475
Boston, MA 02203
(617) 565-3200 (voice) (617) 565-3204 (TTY)

Complaints must be filed within 300 days of the adverse action.

Retaliation

It is expressly prohibited for an employee to retaliate against employees who bring sexual harassment charges or assist in investigating charges. Retaliation is a violation of this policy and may result in discipline, up to and including termination. No employee will be discriminated against, or discharged, because of bringing or assisting in the investigation of a complaint of sexual harassment.

Pregnant Workers Fairness

WNL Products will provide pregnant workers, or workers with pregnancy-related conditions (such as nursing), reasonable accommodation and protection from discrimination and retaliation in accordance with the Massachusetts Pregnant Workers Fairness Act (MPWFA)

New Hire

The human resources representative is responsible for having the new employee fill out all pre-employment forms, benefit applications, and enrollment forms; providing basic information on pay and leave policies, benefits, parking situations, and working hours, on the employee's first day of work.

Within the first week of employment, the human resources representative will conduct a new employee orientation.

Introductory Period

All newly hired employees are on an introductory period during their first 90 days of employment.

During the introductory period, you will be able to determine if your new job is suitable for you, and your supervisor will have an opportunity to evaluate your work performance. However, the completion of the introductory period does not guarantee employment for any period thereafter.

Employees become eligible for certain benefits only after completion of the introductory period, unless otherwise noted.

Rehire

Applications received from former employees will be processed using the same procedures and standards that govern all direct applications. The hiring manager will review the former employee's performance records and the circumstances surrounding termination of previous employment with the company. This information will be provided to the staff responsible for screening and interviewing applicants. WNL Products has no obligation to rehire former employees.

Employees who are rehired following a break in service more than one year other than an approved leave of absence must serve a new initial introductory period, whether such a period was previously completed or not. Such employees are considered new employees from the effective date of their re-employment for all purposes, including the purpose of measuring benefits.

Employees who are rehired following a break in service of less than one year will not be required to serve a new initial introductory period. Such employees are considered continuing employees, and all benefits and benefit calculations will pick up where they left off, less any paid-out accruals.

Relatives

WNL Products permits the hiring of relatives of current employees if the applicant is qualified and selected by the hiring manager. Only in extraordinary circumstances, with management approval, should a relative directly or indirectly supervise a related employee. A relative is defined as any person related to the employee by blood, marriage, or adoption in the following degrees: parent (including father-in-law and mother-in-law), child, grandparent, grandchild, brother, sister, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, and first cousin.

Employee Orientation

All new employees will participate in an orientation meeting within one month of their hire date. The orientation is designed to acquaint the new employee with the company and its policies. Managers will be responsible for ensuring the attendance of new employees at the company orientation sessions.

On the first day of employment, the employee's manager is responsible for assisting the employee in completing all check-in and benefit enrollment procedures with the Business Department. In addition, the manager will ensure that the new employee receives an introduction within the

company and is provided with in-depth information regarding their specific role and responsibilities within their department.

Each new employee will receive an Employee Handbook on his/her first day of work. This handbook must be read, and the receipt page must be signed and returned to the Business Department within the first five days of employment.

If you lose your employee handbook, or if it becomes damaged in any way, please notify your manager as soon as possible to obtain a replacement copy.

Your supervisor is responsible for the operations of your department. He/she is a good source of information about the company and your job.

Confidentiality of Company Information

It is the responsibility of all WNL Products employees to safeguard sensitive company information. The nature of our business and the economic well-being of our company are dependent upon protecting and maintaining proprietary company information.

Do not discuss the company's confidential business with anyone who does not work for us.

All current and former employee information is also confidential and should never be discussed with anyone outside of the company. Any telephone calls regarding employees, no matter how minor the request may seem, must be forwarded to the business manager.

Continued employment with the company is contingent upon compliance with this policy. Every company manager bears the responsibility for the orientation and training of their employees to ensure enforcement of company confidentiality.

Conflict of Interest/Code of Ethics

WNL Products' reputation for integrity is our most valuable asset, and is directly related to the conduct of our officers and other employees. Therefore, employees must never use their positions with the company, or any of its customers, for private gain, to advance personal interests, or to obtain favors or benefits for themselves, members of their families, or any other individuals, corporations, or business entities.

WNL Products adheres to the highest legal and ethical standards applicable in our business. The company's business is conducted in the strict observation of both the letter of the law and spirit of all applicable laws. The integrity of each employee is of utmost importance.

Employees of WNL Products shall conduct their personal affairs in such a fashion that their duties and responsibilities to the company are not jeopardized and/or legal questions do not arise with respect to their association or work with the company.

No employee of WNL Products shall engage in the same or a similar line of business or research as that carried out by the company. An employee shall not have a financial interest in a company which is a competitor of or supplier to the company.

Care of Equipment

Employees are expected to demonstrate proper care when using the company's property and equipment. No property may be removed from the premises without the proper authorization of management. If you lose, break, or damage any property, report it to your supervisor immediately.

Personal Property

WNL Products is not responsible for loss or damage to personal property. Valuable items, such as purses and all other valuables, should not be left in areas where theft could occur.

Medical Evaluations and Interviews

Once an employee has been hired, medical evaluations and/or interviews may be required to ensure that a prospective employee can perform their essential job-related tasks. Medical evaluations or interviews will be conducted whenever a job has special physical demands, or if a reasonable question exists concerning whether the employee would endanger their health or safety, or the health or safety of others in performing assigned tasks.

The medical evaluation will be at company expense and performed by a physician chosen by the company. The employee will be required to sign a written release of this information to the company. WNL Products will treat as confidential the information contained in a report of medical evaluation. The company will provide the employee with a copy of any written report it receives from the health professional with respect to the evaluation.

An employee's continued employment with WNL Products is conditioned upon successful completion of the medical evaluation.

Grievance Procedure

A grievance is considered to be any dispute between an employee and the company which impacts an employee's ability to perform their job.

An employee may express a verbal grievance to their immediate manager. If the concern is not resolved to the employee's satisfaction within one week, the employee may put in writing the details of their grievance and submit the grievance to the immediate manager.

The president, who will appoint a person to decide the matter, will review the written statement. The employee and their manager will request a hearing with the appointed person for a resolution of the problem. The problem will be discussed in the presence of the employee and manager. Final resolution of the grievance will be made by the appointed person and discussed with the employee and manager.

Gratuities to Customer or Supplier Representation

This policy establishes the ethical conduct to be maintained by employees in relationships with customers and suppliers.

As an employee, you may not receive, give, pay, promise, or offer to our customers anything of value, whether cash or any other property, for the purpose of securing or appearing to secure preferential treatment. This also includes any form of gratuity to or from employees of our customers or members of their families.

Any violation of this policy will constitute grounds for immediate termination.

Contact with the Media

All media inquiries regarding the company and its operations must be referred to the president. Only the president is authorized to make or approve public statements pertaining to the company or its operations. No employees, unless specifically designated by the president, are authorized to make those statements.

Termination of Employment

Termination of Employment

Termination Overview

Terminations will be treated in a confidential, professional manner by all concerned. The manager and Business Department will work together to ensure thorough, consistent, and evenhanded termination procedures. This policy and its administration will be implemented in accordance with the company equal opportunity statement.

Either the employee or employer can terminate the employment relationship with the company at any time and for any reason. The company subscribes to the policy of employment at will. Continued employment with the company is at the sole and exclusive option of company management. Permanent employment or employment for a specific term cannot be guaranteed or promised in the absence of a specific written contract of employment between an employee and the company.

Employment with the company is normally terminated through one of the following actions, within two classifications:

Voluntary Termination

Resignation - voluntary termination by the employee.

Involuntary Termination

Dismissal - involuntary termination by the company for any reason at any time with or without cause.

Layoff - involuntary termination due to reduction of the work force or elimination of a position.

Voluntary Termination

Should you decide to resign from WNL Products, you are asked to provide at least two weeks' advanced notice. Your thoughtfulness will be appreciated and will be noted favorably should you ever decide to reapply for employment with the company.

An employee desiring to terminate employment, regardless of employee classification, is expected to give as much notice as possible. Two weeks or ten working days is generally considered to be sufficient notice time to find a replacement.

Should an employee resign to join a competitor, if there is any other conflict of interest, or if the employee refuses to reveal the circumstances of their resignation and the future employer, the manager may require the employee to leave the company immediately rather than work during the notice period. This is not to be construed as a reflection upon the employee's integrity, but rather an action in the best interests of business practice. When immediate voluntary termination occurs for the above reasons, the employee will receive pay "in lieu of notice," the maximum being two weeks of pay based upon a typical, average workweek at the employee's straight-time rate or salary.

Employees terminating voluntarily are entitled to receive their current Paid Time Off balance.

Voluntary Termination Processing Procedures

1. The employee is asked to immediately notify his/her supervisor/manager at least two weeks prior to the desired resignation date. The Business Department will direct and coordinate the termination procedure.
2. On the final day of employment, the Business Department must receive all keys, ID cards, this employee handbook, and company property from the employee. The

company may take action to recoup any replacement cost and/or seek the return of company property through appropriate legal recourse.

3. The Business Department shall conduct an exit interview with the employee.

Final Paycheck – Voluntary Termination

In cases of voluntary termination (resignation), final paychecks will usually be issued on the next regular payday and directly deposited, as per regular instructions, or mailed to the employee's home. The final check shall include all earned pay and any expenses due the employee.

Final pay for non-exempt employees includes payment for all hours worked since the employee's last payday and payment for any earned but unused PTO time. Exempt employees final weekly pay will be prorated based on the percentage of the pay period actually worked, and payment for the current PTO balance.

Final pay is reduced by taxes and other required legal deductions, authorized deductions (such as employee contributions to the premium cost of the group health plan) and the outstanding balance of any advance of salary (including a negative PTO balance).

NOTE: WNL Products does not provide a "letter of reference" to former employees. Generally, WNL Products will confirm, upon written request, our employees' dates of employment and job title.

NOTE: You should notify the company if your mailing address changes during the calendar year in which termination occurs so that your tax information will be sent to the proper address.

Involuntary Termination

Dismissal

An employee may be dismissed at any time, for any reason, with or without cause, at the sole and absolute discretion of company management. In the case of dismissal, the company may, at its sole discretion, give some notice of its intent to dismiss an employee, but the company is not required to give any such notice.

Dismissed employees are entitled to receive their current PTO balance.

Layoff

When a reduction in force is necessary, or one or more positions are eliminated, the company will, at its sole discretion, identify the employees to be laid off. At the company's discretion, the company may or may not give two weeks' notice to the laid off employee.

Involuntary Termination Processing Procedures

1. The manager must immediately notify the Business Department of the desire to terminate an employee so that a termination checklist can be initiated. The Business Department will direct and coordinate the termination procedure.
2. The employee will meet with the supervisor/manager, and the human resource representative.
3. On the final day of employment, the Business Department must receive all keys, ID cards, this employee handbook, and company property from the employee. The company may take action to recoup any replacement cost and/or seek the return of company property through appropriate legal recourse.
4. The Business Department shall conduct an exit interview with the employee.

Final Paycheck – Involuntary Termination

Involuntarily terminated employees will receive their final paycheck immediately upon termination.

Final pay for non-exempt employees includes payment for all hours worked since the employee's last payday, and payment for the current PTO balance. Exempt employees' final weekly pay will be prorated based on the percentage of the pay period actually worked, and payment for the current PTO balance.

The final check shall include all earned pay and any expenses due to the employee.

Final pay is reduced by taxes and other required legal deductions, authorized deductions (such as employee contributions to the premium cost of the group health plan) and the outstanding balance of any advance of salary, including a negative PTO balance.

NOTE: WNL Products does not provide a "letter of reference" to former employees. Generally, WNL Products will confirm upon request our employees' dates of employment and job title.

NOTE: You should notify the company if your mailing address changes during the calendar year in which termination occurs so that your tax information will be sent to the proper address.

Employment Status & Records

Anniversary Date

An employee's anniversary date is defined as their first day on the job with the company. Performance reviews will be completed annually on the employee's anniversary date. If a review cannot be completed prior to the employee's anniversary date and a salary adjustment is in order, it will be made retroactive to the anniversary date.

Reinstatement

Employees who are reinstated into the company may maintain their original anniversary date for seniority purposes as well as for those benefit programs governed by the anniversary date. The policy will be as follows:

Layoff - Employees who terminate because of reduction in work force will maintain their original anniversary date for seniority purposes, if they are re-employed by WNL Products within one year after date of termination.

Voluntary Resignation - Employees who voluntarily terminate their employment with WNL Products may maintain their original anniversary date, subject to management approval, if they are re-employed by the company within six months after the date of termination. The company is under no obligation to rehire any such employee.

Termination - Employees who are re-employed by the company after termination will lose their original anniversary date for all purposes and be assigned a new date corresponding to their first day on the job after re-employment. This policy shall not apply to layoffs or to an employee who was erroneously terminated for cause and later reinstated.

Employment Status and Classification

Employment Status

There are three levels of employment status at WNL Products:

Regular Full-time - An employee who works 30 or more hours per workweek on a regularly scheduled basis. Regular Full-time employees are eligible for company benefits.

Regular Part-time - An employee who works less than 30 hours per workweek on either a regularly scheduled basis or on an irregular basis. Regular Part-time employees are not eligible for company benefits.

Temporary - An employee hired for a period not exceeding three months. An extension of a temporary work classification for an additional three-month period, or less, may be granted, if upon review by management, the assignment is clearly found to be necessary. A temporary employee may be full-time or part-time. In addition to the use of this classification for secretarial or clerical positions, it applies to students working part-time and those who work during the summer. Temporary employees are not eligible for company benefits.

Employment Classification

All employees are classified as exempt and non-exempt according to these definitions:

Exempt - Positions of a managerial, administrative, or professional nature or for outside sales, as prescribed by federal and state labor statutes, which are exempt from mandatory overtime payments.

Non-Exempt - Positions of a clerical, technical, or service nature, as defined by statute, which are covered by provisions for overtime payments.

If you are uncertain as to your status, please contact your supervisor/manager.

Access to Personnel Files

All personnel files maintained in the office of the business manager are private and confidential. No person (other than an authorized human resources representative or the employee accessing their own file) shall be permitted any access to these files.

WNL Products shall provide an employee with the opportunity to view the file within seven working days following receipt of a written request. If the company can reasonably show that such a deadline cannot be met, the company shall have an additional seven days to comply. Access to files shall be allowed only in the presence of an authorized office employee during regular office hours. Under no circumstance shall an individual have the right to remove the file from the office. After viewing, an employee may obtain copies of the information or documents in the personnel records at his/her own cost.

Notice Requirement

WNL Products shall notify an employee within 10 days of the employer placing in the employee's personnel record any information to the extent that the information is, has been used, or may be used, to negatively affect the employee's qualification for employment, promotion, transfer, additional compensation or the possibility that the employee will be subject to disciplinary action.

Reference Check Requests

WNL Products will not honor any oral requests for references. All requests must be in writing and on company letterhead. Generally, we will only confirm our employees' dates of employment and job title.

An employee, under no circumstance should provide an individual with information regarding current or former employees of our company. If you receive a request for reference information, forward it to the business manager immediately.

Job Descriptions

Job descriptions are available in the Business Department for all positions in the company. The items included in each position description are the following:

- Job identification.
- Essential job qualifications.
- Summary statement.
- Assigned responsibilities or duties; and
- Supervisor or manager.

Position descriptions are used to determine employee selection, job requirements, performance appraisals, organizational structure, and the relative worth of jobs in relation to each other.

Company management annually reviews all company positions to ensure equity and consistency in our human resource system.

Pay Equity

WNL Products will not pay wages to any employee at a rate less than the company pays employees of the opposite sex for comparable work (work that involves substantially similar skill, effort and responsibility, and is performed under similar working conditions).

This policy is to be construed in accordance with applicable federal and state laws and regulations.

Change in Personal Data

To aid you and/or your family in matters of personal emergency, we need to maintain up-to-date information.

Changes in name, address, telephone number, marital status, number of dependents, or changes in next of kin and/or beneficiaries should be given to the business manager promptly.

Performance Management

Professional Development

WNL Products believes in supporting the individual growth of employees. To encourage employee development, the company offers a professional development reimbursement program to eligible employees who attend job-related seminars.

To participate in this program, you must be a Regular Full-time employee.

Approval from your supervisor must be received prior to registration for the seminar. WNL Products will pay 100 percent of the cost of approved related seminars.

To keep our company informed of new developments, we ask that you share any new information presented at the seminar with the rest of the staff.

Performance Review

Your performance is important to WNL Products. Once each year, on or about your anniversary date, your direct supervisor will review your job progress within our company and help you set new job performance plans.

Our performance review program provides the basis for better understanding between you and your direct supervisor, with respect to your job performance, potential, and development within the company.

New employees will additionally have a performance review at the end of the 90-day introductory period.

During the performance review, the employee will be evaluated on several competencies. The competencies include, but are not limited to knowledge, productivity, quality, initiative, dependability, attendance, and reliability. You will have specific goals and objectives within some of the competency topics, and the completion of those goals and objectives will drive the score for that competency. Factors will include how well the employee has met the objectives agreed upon in the last review, and the employee's level of contribution to the success of the department/division relative to other employees.

The manager shall verify that the employee is familiar with their job duties, previous goals, and the appraisal criteria. At the conclusion of the performance appraisal, the employee will be requested to sign the appraisal verifying that he or she participated in the evaluation. The employee should be encouraged to submit comments about the appraisal that will become part of the record. A date for the next appraisal shall be agreed upon and noted on the appraisal form. The employee must be given a signed copy of the appraisal. The appraisal is then submitted for review by the next level of management.

Merit Pay Increase

At WNL Products, pay increases are related to an employee's performance. A decision relating to the employee's merit increase in pay will be made after the performance review and rating process has been completed. Merit increases in pay are neither automatic nor periodic. Regardless of performance review scores, merit pay increases may not be awarded in the event of financial or economic reasons, or other business needs.

Any merit increase in pay will be retroactive to the anniversary date of hire. The manager will forward a merit increase recommendation with the appraisal to the next level of management. They are reserved for employees who show consistent achievement of job requirements and higher.

Performance Improvement

Performance improvement may be suggested whenever company management believes that an employee's performance is less than satisfactory and can be resolved through adequate counseling. Corrective counseling is completely at the discretion of company management. The company desires to protect its investment of time and expense devoted to employee orientation and training whenever that goal is in the company's best interests. The company expressly reserves the right to discharge "at will." Even if corrective counseling is implemented, it may be terminated at any step at the discretion of management. Management, in its sole discretion, may warn, reassign, suspend, or discharge any employee at will, whichever it chooses and at any time.

The manager, with assistance of the human resources representative, will determine the course of action best suited to the circumstances.

Corrective Counseling

If a performance improvement plan does not result in improved performance; or in the event of minor workplace or policy violations, the employee will be put through the corrective counseling process.

The corrective counseling process includes the following steps:

1. Verbal counseling
2. Written warning
3. Probation
4. Termination

Verbal counseling - As the first step in correcting unacceptable performance or behavior, the manager will review pertinent job requirements with the employee to ensure their understanding of them. The manager will document the verbal counseling for future reference immediately following the review, and this documentation will become part of the employee's personnel file, although the manager may direct that the record of verbal counseling be removed after a period of time, under appropriate circumstances.

Written warning - If the unacceptable performance or behavior continues after verbal counseling, the next step will be a written warning. Certain circumstances, such as violation of a widely known policy or safety requirement, may justify a written warning without first using verbal counseling. The written warning defines the problem and how it may be corrected. A written warning becomes part of the employee's personnel file, although the manager may direct that the written warning be removed after a period of time, under appropriate circumstances.

Probation - If the problem has not been resolved after a written warning, or the circumstances warrant it, the individual will be placed on probation. Probation is a serious action in which the employee is advised that termination will occur if improvement in performance or conduct is not achieved within the probationary period. The human resources representative and the employee's manager, after reviewing the employee's corrective counseling documentation, will determine the length of probation. A written probationary notice to the employee is prepared by the manager.

The manager will personally meet with the employee to discuss the probationary letter and answer any questions. The employee should acknowledge receipt by signing the letter. If the employee refuses to sign, the manager may sign attesting that it was delivered to the employee and identifying the date of delivery. The probationary letter becomes part of the employee's personnel file.

On the defined probation counseling date or dates, the employee and manager will meet to review the employee's progress in correcting the problem which led to the probation.

At the completion of the probationary period, the human resources representative and the manager will meet to determine whether the employee has achieved the required level of performance and to consider removing the employee from probation, extending the period of probation, or taking further action.

Termination – Involuntary termination is reserved for those cases that cannot be resolved by corrective counseling or in those cases where a major violation has occurred.

The employee will be notified of the termination by the manager and will be directed to report to the human resources representative for debriefing and completion of termination documentation.

The following definitions and classification of violations, for which corrective counseling, performance improvement, or other disciplinary action may be taken, are merely illustrative and not limited to these examples. A particular violation may be major or minor, depending on the surrounding facts or circumstances.

Minor violations - Less serious violations that have some effect on the continuity, efficiency of work, safety, and harmony within the company. They typically lead to corrective counseling unless repeated or when unrelated incidents occur in rapid succession. Some examples of minor violations include:

- Excessive tardiness.
- Unsatisfactory job performance.
- Defacing company property.
- Interfering with another employee's job performance.
- Excessive absenteeism.
- Failure to observe working hours, such as the schedule of starting time, quitting time, rest and meal periods.
- Performing unauthorized personal work on company time.
- Failure to notify the manager of the intended absence either before or within one hour after the start of a shift.
- Unauthorized use of the company telephone, Internet, or equipment for personal business.

Major violations - These more serious violations would include any deliberate or willful infraction of company rules and may result in immediate termination of employment. Some examples of major violations include:

- Fighting on company premises.
- Repeated occurrences of related or unrelated minor violations, depending upon the severity of the violation and the circumstances.
- Any act which might endanger the safety or lives of others.
- Departing company premises during working hours for personal reasons without the permission of the manager.
- Bringing firearms or weapons onto the company premises.
- Deliberately stealing, destroying, abusing, or damaging company property, tools, or equipment, or the property of another employee or visitor.
- Disclosure of confidential company information or trade secrets to unauthorized persons.
- Willfully disregarding company policies or procedures.
- Willfully falsifying any company records.
- Failing to report to work without excuse or approval of management for three consecutive days.
- Bringing software into the company and installing it on company computers without authorization.
- Violating the terms set out in the e-Policy.

NOTE: WNL Products expressly reserves the right to terminate "at will." Even if corrective counseling is implemented, the employee may be terminated at any step at the discretion of management. Management, in its sole discretion, may warn, reassign, suspend, or terminate any employee at will, whichever it chooses, and at any time.

Health and Welfare Benefits

WNL Products has developed a comprehensive set of employee health and welfare benefit programs to supplement our employees' regular wages. Our benefits represent a hidden value of additional income to our employees.

This section of the employee handbook describes the current health and welfare benefit plans maintained by the company. Refer to the actual plan documents and summary plan descriptions if you have specific questions regarding the benefit plan. Those documents are controlling.

Unless otherwise noted, the employee benefits outlined in this section are available only to benefits-eligible employees, who are:

Regular Full-time - An employee who works 30 or more hours per workweek on a regularly scheduled basis.

The company reserves the right to modify its benefits at any time. Employees will be informed of any changes.

Health Insurance

Health Insurance Options

Regular Full-time employees are eligible to enroll in the company-sponsored health insurance plan.

Part-time employees (employees regularly scheduled to work less than 30 hours per week) are not eligible to enroll in the company-sponsored health insurance plan but can obtain health insurance coverage through the Health Insurance Marketplace, or they can obtain health insurance coverage on their own.

Health Insurance for Benefits-eligible Employees

All Regular Full-time employees are eligible to enroll in the company-sponsored health insurance plan, at a single, employee plus one, or family level. In addition to comprehensive health benefits, the health insurance plan includes a prescription drug program, annual routine eye exams, pediatric dental services, and other member programs and services.

Employees can enroll in the health insurance plan, or make changes to the level of coverage only at specific times, which are:

- within 30 days of the date of hire (coverage begins on the first of the month following completion of the 90-day introductory period).
- within 30 days of a qualified change in status (coverage begins on the first day of the qualified change in status).

NOTE: A qualified change in status is defined as a change in family status, including marriage, divorce, death of a spouse, death of a child, birth of a child, adoption of a child, or termination of employment of your spouse.

- during an open enrollment period, which takes place once per year (coverage begins the first day of the new plan year). You will be notified of an upcoming open enrollment period and the date of the new plan year.
- after an involuntary loss of other health insurance coverage. Documentation of the involuntary loss of coverage will be required, and coverage will begin on the day after the involuntary loss of coverage.

Participation in the health insurance plan is subject to all terms and conditions of the agreement between the company and the health insurance company. A full plan description, eligibility requirements, employee contribution table, and enrollment materials are available in the office of the business manager.

Employees will contribute a portion of the insurance premium, which will be deducted from the employee's wages or salary through the company's Section 125 pre-tax deduction plan. The employee contribution percentage may change from plan year to plan year. Employees may ask the business manager about the current contribution percentage.

A change in employment classification that would result in loss of eligibility to participate in the health insurance plan (such as termination or change to a non-benefits-eligible status) may qualify an employee for benefits continuation under the Consolidated Omnibus Budget Reconciliation Act (COBRA).

Since health insurance is a very complex and expensive employee benefit, employees should consult the plan summary document given to all eligible employees. Enrollment materials are available in the office of the business manager.

Health Insurance for Non-Benefits-eligible Employees

The Massachusetts Health Connector offers many health insurance plans under which non-benefits-eligible employees (Part-time) may choose to enroll.

Health Insurance Waiver Forms

WNL Products employees who have declined to participate in the company-sponsored health insurance plan and/or have declined to participate in the employer's Section 125 plan must complete and return a Health Insurance Waiver form to the business manager. You can get a Health Insurance Waiver form from the office of the business manager.

Health Benefits Continuation (Mini-COBRA)

The Massachusetts small group continuation of coverage law (Mini-COBRA) gives employees of small businesses with 2-19 employees and their qualified beneficiaries the opportunity to continue health insurance coverage under the company's health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under Mini-COBRA, the employee or beneficiary pays the full cost of coverage at the company's group rates plus an administration fee of no more than 2%. WNL Products provides each eligible employee with a written notice describing rights granted under Mini-COBRA when the employee becomes eligible for coverage under the company's health insurance plan. The notice contains important information about the employee's rights and obligations.

NOTE: To obtain cost information, contact the office of the business manager or a human resources representative.

Dental Insurance

Overview

WNL Products offers eligible employees a dental insurance plan which pays benefits for various dental services based on a rate schedule. See the business manager or a human resources representative for the plan booklet for details.

Eligibility

Regular Full-time employees are eligible for the Dental plan.

Enrollment

Eligible employees may enroll in the company-sponsored dental insurance plan, at a single or family level.

Employees can enroll in the dental insurance plan, or make changes to the level of coverage only at specific times, which are:

- within 30 days of the date of hire (coverage begins on the first of the month following completion of the introductory period).
- within 30 days of a qualified change in status (coverage begins on the first day of the qualified change in status).

NOTE: A qualified change in status is defined as a change in family status, including marriage, divorce, death of a spouse, death of a child, birth of a child, adoption of a child, or termination of employment of your spouse.

- during an open enrollment period, which takes place once per year (coverage begins the first day of the new plan year). You will be notified of an upcoming open enrollment period and the date of the new plan year.
- after an involuntary loss of other dental insurance coverage. Documentation of the involuntary loss of coverage will be required, and coverage will begin on the day after the involuntary loss of coverage.

Enrollment materials are available from the business manager or a human resources representative.

Effective Date

Coverage under the Dental plan for eligible employees who enroll begins on the first of the month following completion of the introductory period.

Participation and Plan Details

Participation in the Dental plan is subject to all terms and conditions of the agreement between WNL Products and the dental insurance carrier. For details of the Dental plan including plan options, benefit amounts, limitations, restrictions, and other exclusions, see the plan document provided to all eligible employees. Contact the Business Office or a human resources representative for more information about Dental plan benefits.

Cost

Employees will contribute a portion of the insurance premium, which will be deducted from the employee's wages or salary through the company's Section 125 pre-tax deduction plan. The employee contribution percentage may change from plan year to plan year. Employees may ask the business manager about the current contribution percentage.

Loss of Coverage

A change in employment classification that would result in loss of eligibility to participate in the dental insurance plan (such as termination or change to a non-benefits-eligible status) does not qualify an employee for benefits continuation under the Consolidated Omnibus Budget Reconciliation Act (COBRA).

Short-term Disability Insurance

Overview

WNL Products provides a short-term disability (STD) plan for eligible employees who are unable to work because of a qualifying disability due to an injury, illness, or pregnancy-related disability. Some disabilities may not be covered or may have limited coverage.

Eligibility

Regular Full-time employees are eligible for the STD plan.

Enrollment

Eligible employees are automatically enrolled in the STD plan.

Effective Date

Coverage under the STD plan for eligible employees who enroll begins after the completion of the introductory period.

STD Payment

In the event of a qualified disability due to injury or sickness, your benefit would be the lesser of 60% of your weekly base salary or \$1,000 per week. Your payment may be reduced by deductible sources of income and disability earnings.

Getting Paid

STD payments begin after you have been disabled for fourteen (14) consecutive calendar days (the first fourteen days of a disability are not covered under the STD plan; this is known as the elimination period). The disability benefit is paid until the date the employee is able to return to work, or up to 13 weeks.

Payments for a pre-existing condition will be limited to a maximum of two (2) weeks.

Cost

The cost of the STD insurance plan is fully paid for by WNL Products. However, employees are responsible for the tax on the premiums which will be taken through payroll deductions.

Participation and Plan Details

Participation in the STD plan is subject to all terms and conditions of the agreement between WNL Products and the disability insurance carrier. For details of the STD benefits plan including plan options, benefit amounts, when they are payable, limitations, restrictions, and other exclusions, see the plan document provided to all eligible employees. Contact the Business Office or a human resources representative for more information about STD benefits.

Long-term Disability Insurance

Overview

WNL Products provides a Long-Term Disability (LTD) plan for eligible employees who are unable to work because of a qualifying disability due to an injury, illness, or pregnancy-related disability. Some disabilities may not be covered or may have limited coverage.

Eligibility

Regular Full-time employees are eligible for the LTD plan.

Enrollment

Eligible employees must enroll in the LTD plan within 30 days of their hire date.

Effective Date

Coverage under the LTD plan for eligible employees who enroll begins after the completion of the introductory period.

LTD Payment

In the event of a qualified disability due to injury or sickness, your benefit would be the lesser of 60% of your monthly base salary or \$6,000 per month. Your payment may be reduced by deductible sources of income and disability earnings.

Getting Paid

LTD payments begin after you have been disabled for 90 consecutive calendar days (the first 90 days of a disability are not covered under the LTD plan; this is known as the elimination period). For a disability starting before the employee reaches age 60, the maximum payment period will last until the Social Security Normal Retirement Age is reached, based on the table in the plan document. If the disability begins after age 65, benefits are paid for a limited number of months, based on the table in the plan document.

Survivor Benefit

Three (3) times the last monthly benefit after it is reduced by disability earnings you receive.

Own Occupation Period

The first twenty-four (24) months of benefit payments from this plan. (See plan document for definition of "own occupation.")

Cost

The cost of the LTD insurance plan is fully paid for by WNL Products. However, employees are responsible for the tax on the premiums which will be taken through payroll deductions.

Participation and Plan Details

Participation in the LTD plan is subject to all terms and conditions of the agreement between WNL Products and the disability insurance carrier. For details of the LTD benefits plan including plan options, benefit amounts, when they are payable, limitations, restrictions, and other exclusions, see the plan document provided to all eligible employees. Contact the Business Office or a human resources representative for more information about LTD benefits.

Basic Life Insurance, Accidental Death and Dismemberment, Dependent Life Insurance

Overview

WNL Products offers Basic Life Insurance and Accidental Death and Dismemberment Insurance to eligible employees.

Life Insurance offers you and your family important financial protection from the losses associated with your untimely death by paying your beneficiary a benefit.

Accidental Death and Dismemberment (AD&D) pays an additional benefit to your beneficiary if your death is caused by an accident; and it pays you a benefit if you suffer dismemberment in an accident.

Dependent Life Insurance pays you a benefit upon the death of a spouse or a dependent child.

Eligibility

Regular Full-time employees are eligible for the Life Insurance, AD&D, and Dependent Life Insurance plans.

Enrollment

Eligible employees must enroll in the Life Insurance, AD&D, and Dependent Life Insurance plans within 30 days of their hire date.

Effective Date

Coverage under the Life Insurance, AD&D, and Dependent Life Insurance plans for eligible employees who enroll begins after the completion of the introductory period.

Life Insurance, AD&D, and Dependent Life Insurance Payments

Life Insurance: In the event of your death, your named beneficiary will receive a benefit amount that is equal to your Basic Annual Earnings, rounded to the next higher \$1,000 multiple, if not already one, to a maximum of \$100,000.

Accidental Death and Dismemberment: If your death is caused by an accident, your named beneficiary will receive a benefit amount equal to 100% your Life Insurance benefit in addition to the Life Insurance benefit. If you suffer accidental dismemberment, the plan pays you a percentage of your Life Insurance benefit, based on your loss and a table in the plan document.

Dependent Life Insurance: You will receive a benefit amount of \$10,000 in the event of your spouse's death. You will receive a benefit amount of \$5,000 in the event of a dependent child's death.

Benefit Reduction Schedule

The life insurance and AD&D benefit is reduced to 65% of the scheduled amount at age 65, and 50% of the scheduled amount at age 79.

Beneficiary

You can name anyone as your beneficiary, including a trust or an estate, or you can name multiple beneficiaries who will split the benefit.

Unless you specifically name someone else, the beneficiary you select for your Life Insurance plan will also be the beneficiary for your AD&D plan.

You are the beneficiary for your Dependent Life Insurance Plan.

Cost

The cost of the Life Insurance, AD&D, and Dependent Life Insurance plans are fully paid for by WNL Products. However, employees are responsible for the tax on the premiums which will be taken through payroll deductions.

Participation and Plan Details

Participation in the Life Insurance, AD&D, and Dependent Life Insurance plans is subject to all terms and conditions of the agreement between WNL Products and the insurance carrier. For details of the Life Insurance, AD&D, and Dependent Life Insurance plans, including plan options, benefit amounts, when they are payable, limitations, restrictions, and other exclusions, see the plan document provided to all eligible employees. Contact the business manager or a human resources representative for more information.

Supplemental Life Insurance and Supplemental Dependent Life Insurance

Overview

WNL Products offers Supplemental Life Insurance and Supplemental Dependent Life Insurance to eligible employees.

Supplemental Life Insurance offers you and your family important financial protection from the losses associated with your untimely death by paying your beneficiary a benefit. This payment would be in addition to the basic life and accidental death and dismemberment insurance payments.

Supplemental Dependent Life Insurance pays you a benefit upon the death of a spouse or a dependent child.

Eligibility

Regular Full-time employees are eligible for the Supplemental Life Insurance and Dependent Life Insurance plans.

Enrollment

Eligible employees must enroll in the Supplemental Life Insurance and Dependent Life Insurance plans within 30 days of their hire date.

Effective Date

Coverage under the Supplemental Life Insurance and Dependent Life Insurance plans for eligible employees who enroll begins after the completion of the introductory period.

Supplemental Life Insurance and Dependent Life Insurance Payments

Supplemental Life Insurance: In the event of your death, your named beneficiary will receive a benefit amount that is equal to the amount you chose during the enrollment process. Benefit amounts are available from \$10,000 to \$100,000, in \$10,000 increments.

Supplemental Dependent Life Insurance: You will receive a benefit amount of \$10,000 in the event of your spouse's death. You will receive a benefit amount of \$5,000 in the event of a dependent child's death.

Beneficiary

You can name anyone as your beneficiary, including a trust or an estate, or you can name multiple beneficiaries who will split the benefit.

You are the beneficiary for your Dependent Life Insurance Plan.

Cost

The cost of the Supplemental Life Insurance and Dependent Life Insurance plans are paid by you, through pre-tax payroll deductions. However, employees are responsible for the tax on the premiums which will be taken through payroll deductions.

Participation and Plan Details

Participation in the Supplemental Life Insurance and Dependent Life Insurance plans is subject to all terms and conditions of the agreement between WNL Products and the insurance carrier. For details of the Supplemental Life Insurance and Supplemental Dependent Life Insurance plans, including plan options, benefit amounts, when they are payable, limitations, restrictions, and other exclusions, see the plan document provided to all eligible employees. Contact the business manager or a human resources representative for more information.

Workers' Compensation Insurance

WNL Products insures all employees against accidental injuries occurring on the job, in accordance with the Massachusetts Workers' Compensation Law. Coverage begins on the date of employment and covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment.

Employees must report all accidents immediately to their supervisor or department manager, and the manager must notify the business manager or a human resources representative within 24 hours. If the supervisor or department manager is not available, the employee should notify the business manager or a human resources representative. No matter how minor an on-the-job injury may appear, it is important that it is reported immediately. This procedure will enable an eligible employee to qualify for coverage, in a timely manner. Failure to immediately report an injury to your supervisor could jeopardize your claim.

WNL Products asks for your assistance in alerting management to any condition which could lead to or contribute to an employee accident. Additionally, the company will attempt to provide reasonable accommodation which is medically necessary, feasible, and does not impose an undue hardship on the company as prescribed by applicable federal, state, or local law.

401(k) Plan

Overview

WNL Products offers eligible employees the option of investing in a pretax salary deferral plan, known as a 401(k) Plan, or in a post-tax salary deferral plan, known as a Roth 401(k) plan. These plans are intended to be used in combination with your Social Security benefits and personal resources to provide you with supplemental income upon retirement. See the business manager or a human resources representative for plan differences.

Eligibility

All employees are eligible to enroll in the 401(k) plan after completing the introductory period.

Enrollment

Employees may enroll in a 401(k) plan any time after becoming eligible. Enrollment material and plan descriptions are available from the business manager.

Effective Date

Employee contributions will begin with the first paycheck following enrollment.

Contribution Limits

Employees can make contributions up to 96% of their pay to a 401(k) plan. Employee contributions are 100% vested immediately.

Employer Matching Contribution

WNL Products will match employee contributions by up to 4% based on the following schedule:

Employee Contribution of 1%, Employer Contribution = 1%

Employee Contribution of 2%, Employer Contribution = 2%

Employee Contribution of 3%, Employer Contribution = 3%

Employee Contribution of 4%, Employer Contribution = 3.5%

Employee Contribution of 5% or more, Employer Contribution = 4%

Employer contributions are automatic and are 100% vested immediately.

Time Off Benefits

WNL Products has developed a comprehensive set of employee time off benefit programs, some of which are paid time off programs for eligible employees, others are unpaid. Our benefits represent a hidden value of additional income to our employees.

This section of the employee handbook describes the current time off benefit plans maintained by the company. Refer to the actual plan documents and summary plan descriptions if you have specific questions regarding the benefit plan. Those documents are controlling.

Unless otherwise noted, the employee benefits outlined in this section are available only to benefits-eligible employees, who are:

Regular Full-time - An employee who works 30 or more hours per workweek on a regularly scheduled basis.

The company reserves the right to modify its benefits at any time. Employees will be informed of any changes.

Paid Time Off

Policy Overview

The WNL Products Paid Time Off (PTO) policy is a combined bank of time used for vacation, sickness, and other personal time, (i.e., doctor appointments, personal business transactions, school appointments, and other personal necessities which cannot be attended to before or after work hours) under a single accrual. The WNL Products PTO program offers flexibility and privacy for employees to schedule non-work events. PTO time is earned at the end of each pay period that the employee is actively employed, based on the Accrual of PTO Schedule.

The WNL Products PTO program is in complete compliance with the Massachusetts Earned Sick Time law. Note that once you use all your PTO hours in a given calendar year, you are out of paid time off, even for sick days. Any time taken off once you are out of paid time off will be unpaid time off.

Eligibility

If you are a Regular Full-time employee (regularly work 30 or more hours per workweek), you are eligible for the WNL Products PTO policy.

Earning PTO

You begin earning PTO on your first day of employment, as long as you are eligible for the PTO policy. The amount of time that you will earn each pay period is based on your length of service. Earned PTO increases at certain length of service intervals, based on the table in the *Accrual of PTO Schedule* section. The time earned for your first pay period of employment may be prorated based on the number of days remaining in that first pay period.

Accrual of PTO Schedule

As long as you remain eligible for the PTO policy, you will earn PTO at the end of each pay period of active employment based on the following schedule:

Length of Service	Hours Accrued Per Pay Period	Yearly Maximum Accrued
0-1 years	3.08	80 Hours (10 days)
After 1 full years	4.62	120 Hours (15 days)
After 5 full years	6.15	160 Hours (20 days)
After 10 full years	7.69	200 Hours (25 days)

NOTE: Regular Full-time employees who work less than 40 hours per week earn PTO time at a proportional rate, based on the hours normally scheduled to work. These employees should consult with the business manager or a human resources representative about their PTO earning schedule.

NOTE: Although earning PTO time begins on the date of hire, a new employee cannot use PTO time until he/she has successfully completed the 3-month introductory period.

Requesting and Taking PTO

After you successfully complete your 90-day introductory period, you can request and use PTO time. You will not be allowed to request or use PTO time if you have a negative PTO balance of a maximum of 5 days (see *Negative PTO Balance* below).

You can use PTO time in half-day increments; or in hourly increments if the reason for the time off is for sick time. You can request PTO time for up to ten consecutive days. Special management approval will be necessary for any time in excess of ten consecutive PTO days.

To use PTO time for non-sickness reasons, you must submit your request in writing to your supervisor at least two weeks in advance of the first day to be taken. PTO time cannot be taken unless, and until the request is granted.

PTO time will be granted or denied after your supervisor considers operating requirements, staffing levels, and possible scheduling conflicts. In the event of PTO scheduling conflicts, length of service may be used to determine which employee gets the time off. If PTO time is denied, you can submit an alternate PTO request.

Once granted, PTO time requested will be recorded and deducted from your PTO balance.

WNL Products recommends that you request your desired PTO time as much in advance as possible. Making non-refundable deposits and reservations that may carry cancellation penalties, purchasing non-refundable airline tickets, and coordinating time with fellow vacationers, etc., before your PTO time is granted could result in financial loss if your PTO request is denied for any reason. WNL Products is not responsible for any financial loss that you or any affected traveling companion incur when a PTO time request is denied at any time for any reason.

Negative PTO Balance

After you successfully complete your 90-day introductory period, you can request and use more PTO than you have accrued, but the request cannot result in a negative PTO balance of more than 5 days.

Holidays During PTO Time Off

If a company paid holiday falls within your desired vacation period, you do not need to use PTO for that day. You will be paid for the day off under the Company's Holiday policy.

PTO Carryover

Time off is healthy for employees, and WNL Products encourages you to use earned PTO. However, sometimes you may end the year with some remaining PTO time. You are allowed to carry over a limited amount of PTO from the end of one calendar year into the next.

You may carry over a maximum of 5 PTO days from the end of any calendar year into the next calendar year. If you have any PTO above the 5-day carryover limit at the end of the calendar year, you will forfeit that time. To avoid or minimize PTO forfeiture, you can also cash in a limited amount of unused PTO during a limited time period. (See *Cashing In PTO* below).

Cashing In PTO

WNL Products understands that sometimes you may approach the end of a calendar year with more than the maximum carry-over amount of 5 PTO days (see PTO Carryover above), or you may want to carry over less than 5 days, or none at all. To help you avoid or minimize any PTO forfeited due to

the 5-day carryover rule, or to help you manage future PTO balances, you have a year-end opportunity to be paid for up to 5 PTO days (in 4-hour increments) in lieu of taking the actual time off. You cannot cash in any **PTO** before it is earned (the result of the cash-in cannot result in a negative PTO balance).

To help you plan your carry-over and/or cash-in strategy, you will receive notification of your projected year-end PTO balance during the last pay period of each calendar year. You should consult with a human resources representative if you are unclear about your options.

To cash-in PTO time, you must submit a PTO Cash-in Request form to a human resources representative during the final pay period of the year. Upon submission of a PTO Cash-in Request form, your PTO balance will immediately be reduced by the amount of days for which you are requesting a cash-in. Your payout will be included in your paycheck following the close of the final pay period of the year.

Forfeiting PTO Time

Your PTO balance cannot exceed 5 days at the end of any calendar year. Up to 5 PTO days can be carried over into the next calendar year. Any PTO time in excess of 5 days (the maximum carryover) will be deducted from your PTO balance at the end of the calendar year, and that time will be forfeited. To minimize or avoid forfeited PTO time, you have the opportunity to cash in PTO at the end of the year (see *Cashing In PTO* above).

Changing Employment Status

If you change from a Regular Full-time employee to a non-benefits-eligible employee, you will have your PTO balance paid out in your paycheck following your change in status date. The accrual for the final pay period of Regular Full-time employment will be prorated based on the number of full-time days you work in the pay period of your employment status change. If you have a negative PTO balance on the change of your employment status date, that amount (based on your full-time rate of pay) will be deducted from your paycheck following the change of your employment status date.

If you change from a non-benefits-eligible employee to a Regular Full-time employee, the time you have worked as a non-benefits-eligible employee will be totaled to come up with a full-time equivalency. You will begin earning PTO as of the date of your change in employment status based on the Earned Time Off Schedule.

For example, if you have worked 20 hours per week for 2 years, a full-time equivalency would be one year of service. Therefore, as of your date of employment status change, you will begin earning PTO at the 1+ year rate of 4.62 hours per pay period (up to 120 hours maximum per year). In addition, you would be assigned a PTO anniversary date of one year prior to your change of employment status. Therefore, after your first year of full-time work, you will have reached your two-year anniversary for the sake of the PTO policy (2 years at 20 hours per week, plus 1 year at 40 hours per week is equivalent to 2 years of full-time work).

Your first PTO accrual will be prorated based on the time remaining in the pay period of the change of employment status.

Leaving the Company

Upon termination of employment, any PTO time that you have scheduled but not yet used will be credited back into your PTO account as earned but unused PTO time. If you have completed your 3-month introductory period before your termination date, you will be paid for any earned but unused PTO time upon termination.

If you have a negative PTO balance upon termination, your final paycheck amount will be reduced by the amount of your negative PTO balance.

NOTE: The above policy is the Standard PTO policy. Regular Full-time employees regularly scheduled for less than 40 hours per week have a prorated PTO policy

which affects the earning rate and certain maximums such as the carry-over, cash-in, and negative balance. See the Business Manager for details.

Holidays

Observed Holidays

WNL Products observes, and is closed on the following eight holidays each year:

- New Year's Day
- Martin Luther King, Jr. Day
- Presidents Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus Day
- Veterans' Day
- Thanksgiving Day
- Day After Thanksgiving Day
- Christmas Day

Additional holidays may be added each year at WNL Products' discretion.

Weekend Holidays

If a holiday falls on a Saturday, it is normally observed on the preceding Friday. If a holiday falls on a Sunday, it is normally observed on the following Monday.

Eligibility for Holiday Pay

Eligible employees (Regular Full-time employees) receive pay for a holiday that falls on a day they are normally scheduled to work, beginning on their hire date, there is no requirement to satisfy the introductory period.

Exempt employees will receive holiday pay in proportion to the number of hours they normally are scheduled to work.

Non-exempt employees must work their scheduled workday before and after the holiday in order to be paid for the holiday, unless they are absent with prior permission from their supervisor.

Non-eligible employees (Part-time and Temporary) do not receive pay for a holiday that falls on a day that they are normally scheduled to work.

WNL Products reserves the right to allow for additional holidays to be observed. Employees will be notified of additional holidays at the beginning of each calendar year. Eligible employees will be paid for any additional observed holidays.

Minimal Staff Holidays

Certain holidays may require a minimal staff due to business need. Managers will alert any employee who will be required to work on a paid holiday. If an eligible employee is required to work on a scheduled holiday, the employee will be paid for hours worked at their regular pay in addition to holiday pay.

Holidays During Vacation Time

If a designated holiday falls within an employee's vacation period, no PTO time is deducted for that day.

Religious Holidays

Employees may take religious holidays not designated as a company holiday either without pay, or with pay by using PTO. Prior approval in advance must be obtained from the employee's manager.

Voting Leave

WNL Products believes that every employee should have the opportunity to vote in any state or federal election, general primary or special primary. An employee will be granted unpaid time off in order to vote for the first two hours the polls are open if the employee is otherwise scheduled to work those hours, and they apply for voting leave.

Exempt employees will be provided time off with pay when necessary, in compliance with state and federal wage and hour laws.

Employees must notify their supervisor of the need for leave as soon as possible. When you return from voting leave, you must present a voter's receipt to your supervisor as soon as possible.

Jury Duty Leave

Regular Full-time employees summoned for jury duty will receive their regular wages for the first three days. After the first three days, jury duty leave is granted on an unpaid basis.

Part-time and Temporary employees summoned for jury duty are granted unpaid time off in order to serve.

Exempt employees may be provided with time off with pay when necessary to comply with state and federal wage and hour laws.

It is the employee's responsibility to make arrangements with their supervisor as soon as a summons is received

You are expected to return to work if you are excused from jury duty during regular working hours.

Witness Leave

WNL Products will grant employees unpaid time off for court appearances as a witness when the employee must serve or is required to appear as a result of a court order or subpoena.

Time off for witness leave will only be granted for the time you are required to be in court. The time off will be unpaid.

Employees must notify their supervisor as early as possible to arrange for a witness leave. A copy of the court order or subpoena must be supplied to the employee's supervisor when requesting time off.

Military Service Leave

WNL Products will grant an employee who is required to fulfill military obligations in any branch of the Armed forces of the United States, or in state military services the necessary time off. Any such employee will also be reinstated in accordance with federal and state law.

The time off will be unpaid, except where state law dictates otherwise. Exempt employees may be provided time of with pay when necessary to comply with state and federal wage and hour laws.

Accrued PTO time may be used for this leave if the employee so chooses.

Military orders must be presented to your supervisor, and you must make arrangements for the leave as early as possible prior to your departure. Employees are required to give the company advanced notice of service obligations unless military necessity makes doing so impossible. You must also notify your supervisor of your intent to return to employment based on requirements of the

law. Your benefits may continue to accrue during the period of the leave in accordance with state and federal laws.

Additional information regarding military leave may be obtained from the business manager or a human resources representative.

Bereavement Leave

Regular Full-time employees who have completed their introductory period are eligible for three (3) paid days off to attend to family matters for the death of the following immediate family members:

- Spouse
- Sister
- Grandparent
- Domestic Partner's Parent
- Parent
- Child
- Parent-in-law
- Brother
- Grandchild
- Domestic Partner

Regular Full-time employees who have completed their introductory period are eligible for one (1) unpaid day off for to attend the funeral of aunts, uncles, nieces, and nephews.

Requests for bereavement leave should be made to your immediate supervisor as soon as possible.

Medical Leave of Absence

Upon written application by an employee who has at least 90 days of continuous service with the company, WNL Products will grant to the employee, for an appropriate period of time, a leave of absence without pay for illness or pregnancy subject to the requirements set forth below. The company reserves the right to request a certificate or statement from the employee's physician establishing the employee's physical need for the leave of absence. An employee returning to work from a leave of absence in the case of illness or pregnancy will present a certificate or statement from the employee's physician indicating that the employee is able to return to work.

An employee need not apply for an illness or pregnancy leave of absence if the absence will not exceed five working days. However, the employee must notify their department manager no later than the day of such absence.

The following requirements will be applicable to employees on all types of leaves of absence:

- An employee on any leave of absence shall not return to work prior to the expiration of their leave without the prior written consent of the company.
- An employee who does not return to work at the end of their leave of absence will be considered to have voluntarily resigned from employment with WNL Products.
- If an employee returns to work within eight weeks after the leave of absence begins, the company will return the employee to the employee's previous job, if the job exists and if the employee remains qualified and able to perform the work in such job.
- If an employee returns to work more than eight weeks after the leave of absence begins, the company shall not be required to return the employee to any job within the company.
- An employee who accepts other employment while on any leave will be deemed to have voluntarily resigned their employment with the company.
- Group insurance participation for eligible employees on a leave of absence will continue during the leave but will terminate on the first day after the day on which the leave of absence ends, if the employee does not return to work. During the leave, the employee will be responsible for any employee contribution to group benefit plans. Employees will be advised by the business manager about the amount and method of payment of their portion of the health insurance and/or dental insurance premiums

The time that an employee is on leave of absence will be counted as time worked for determining whether or not the employee is entitled to other company benefits, subject, of course, to the specific provisions of any health insurance policy, retirement plan, or other benefit package. Similarly, an employee's length of service will continue to accrue while the employee is on a leave of absence.

Parental Leave

Regular Full-time employees who have completed their introductory period are eligible for unpaid parental leave.

Parental Leave in Massachusetts is available to women and men. Two employees seeking protected leave for the birth or adoption of a child are allowed only eight weeks in total for the same child. In other words, two employees taking leave for the birth of one child cannot claim eight weeks each for one child, but rather eight weeks total for both employees.

Eligible employees are entitled to a leave of up to eight (8) weeks for:

- giving birth to a child; or
- adopting a child under the age of 18; or
- adopting a child under the age of 23, if the child is mentally or physically disabled.

Eligible employees are required to provide two weeks' notice of their departure date and intention to return.

Benefits during Leave - Eligible employees may use, but are not required to use, accrued PTO time during a parental leave.

The Company will maintain group health insurance and group dental insurance coverage during a covered parental leave on the same terms as if the employee continued to work. Employees will be advised by the business manager about the amount and method of payment of their portion of the health insurance premiums.

The Company will maintain other benefits, such as life and disability insurance during any covered parental leave. The employee will be responsible for the premium payment and/or tax payment on the premium, as per company policy.

Upon Completion of the Leave - At the end of the leave, eligible employees are entitled to return to their previous or similar position, without detriment to pay, hours, status, length of service credit or seniority, unless other employees of equal service time and status in the same or similar positions have been laid off due to a reduction in force.

In the event an employee does not return from a covered parental leave, except if the reason is due to the continuation, recurrence, or onset of a serious health condition, or other circumstances beyond the control of the employee, the Company will recover any health insurance and/or dental insurance premiums it paid during the unpaid portion of any leave by deducting any such amounts from amounts due the employee, if any, or by otherwise seeking recovery of the premium through the legal process. The employee will also be considered to have resigned from the company and employment will be terminated.

NOTE: This leave may run concurrently with any other leave where permitted by state and federal law.

Military Leave

Employees who are required to fulfill military obligations in any branch of the armed forces of the United States, or in state military services, will be given the necessary time off and reinstated in accordance with federal and state law.

The time off will be unpaid, except where state law dictates otherwise. Exempt employees may be provided with time off with pay when necessary to comply with state and federal wage and hour laws.

Accrued paid time off may be used for this leave if the employee chooses. Military orders should be presented to your supervisor and arrangements for the leave must be made as early as possible before departure. Employees are required to give advanced notice of their service obligations to the company, unless military necessity makes this impossible. You must notify your supervisor of your intent to return to employment based on the requirements of the law. Your time off benefits may continue to accrue during the period of leave in accordance with state and federal law.

Benefits during Leave - Eligible employees may use, but are not required to use, accrued PTO time during a military leave.

The Company will maintain group health insurance coverage during a covered military leave on the same terms as if the employee had continued to work. Employees will be advised by the business manager about the amount and method of payment of their portion of the health insurance premium.

The Company will maintain other benefits, such as life and disability insurance during any covered military leave. The employee will be responsible for the premium payment and/or tax payment on the premium, as per company policy.

Additional information regarding military leaves may be obtained from the office manager.

Memberships, Travel, and Expenses

Employee-Incurred Expenses and Reimbursement

WNL Products will pay all actual and reasonable business-related expenses incurred by employees in the performance of their job responsibilities. Their manager must approve all such expenses incurred by an employee before the accounting department makes payment.

Expense reports are to be submitted and supported by evidence of proof of purchase, e.g., receipts. Expense reports are due in the Accounting Department on the last working day of each month.

Mileage Reimbursement

Employees of WNL Products who use their personal vehicle for company purposes will be provided with an automobile allowance of the IRS standard rate as of current taxable year. Normal daily commute is not reimbursable. The employee assumes liability for their personal vehicle in work-related travel. Use of a personal vehicle is always for the employee's benefit and will never be required by the company. Employees must sign a statement confirming that they have a valid driver's license and sufficient vehicle liability insurance.

Mileage reimbursement will be approved by your manager by submitting an expense report detailing the purpose of such travel, date of travel, and mileage traveled. All such expense reports must be submitted for approval as soon as possible but no later than 60 days after the expense was incurred.

Requests for reimbursement are due in the business office on the last working day of each pay period. The employee's reimbursement will be available on the following pay day.

Travel Reimbursement

This policy establishes the general guidelines and procedures to be followed when business travel is required.

- Travel-related expenses are to be detailed on the company travel reimbursement form.
- Employees who prefer to use their personal vehicles for their convenience on company business, including trips to the airport, will be reimbursed at the standard company mileage rate, provided that the time and distance involved is reasonable under the circumstances.
- All parking expenses and highway tolls incurred as a result of business travel will be reimbursed.
- All air travel must be approved in advance by the employee's manager unless unavoidable. All travel will be by coach class whenever possible. The duplicate airline ticket receipt should be attached to the company reimbursement form.
- Employees should select moderately priced lodging convenient to their destination to minimize time and expense. A detailed receipt from the hotel or motel must accompany the reimbursement form unless such is unavailable, in which case, a credit card receipt is acceptable.
- Employees must submit receipts for meals with the reimbursement form. Reasonable tips, when paid by the employee and noted on the receipt, will be reimbursed.
- Travel reimbursement requests are due on the last working day of each month.

Payroll

Payroll Deductions

Mandatory Payroll Deductions

The following mandatory deductions will be made from every employee's gross wage: federal income tax, Social Security FICA tax, and applicable city and state taxes.

Every employee must fill out and sign a federal withholding allowance certificate, IRS Form W-4, on or before their first day on the job. This form must be completed in accordance with federal regulations. The employee may fill out a new W-4 at any time when their circumstances change. Employees who paid no federal income tax for the preceding year and who expect to pay no income tax for the current year may fill out an Exemption from Withholding Certificate, IRS Form W-4E. Employees are expected to comply with the instructions on Form W-4. Questions regarding the propriety of claimed deductions may be referred to the IRS in certain circumstances.

Optional Payroll Deductions

Optional deductions include the portion of Group Health Insurance not paid by the company, the cost for Voluntary Supplemental Insurance, 401(k) contributions, and taxes on the premiums for Life, LTD and STD, which are deducted from each payroll check. Health and Dental Insurance premiums, Voluntary Supplemental Insurance premiums, and 401(k) contributions are all deducted on a pre-tax basis, as long as the employee has enrolled in the Section 125 plan. All other deductions are taken on an after-tax basis.

NOTE: Every employee will receive an annual Wage and Tax Statement, IRS Form W-2, for the preceding year on or before January 31. An employee who believes that their deductions are incorrect for any pay period, or on their W-2, should check with the business manager immediately.

Other Payroll Deductions

It is the policy of WNL Products that exempt employees pay will not be "docked" or subject to deductions in violation of salary pay rules issued by the United States Department of Labor and any corresponding rules issued by the state government, as applicable; however, the company may make deductions from employees' salaries in a way that is permitted under federal and state wage and hour rules. Employees will be reimbursed in full for any isolated, inadvertent, or improper deductions as defined by law.

Thus, exempt employees may be subject to the following salary deductions, except where prohibited by state law, but only for the following reasons:

- Absence for one or more full days due to sickness or disability after PTO time has been exhausted and before STD payments begin, if applicable.
- Suspension for violations of safety rules of major significance.
- Suspensions of one or more full days for violations of workplace conduct rules, such as rules against sexual harassment and workplace violence.
- Full days not worked in a pay period prior to the hire date, and full days not worked in a pay period after the termination date, resulting in a proportional rate of an employee's full salary.
- Any unpaid leave.
- Any negative PTO balance upon termination.

Timekeeping

Accurate record keeping of time worked is the responsibility of every WNL Products employee. Federal and state laws require the company to keep an accurate record of time worked to calculate employee pay and benefits. Time worked is all the time actually spent on the job performing assigned duties.

Non-Exempt Timekeeping

Non-exempt employees should accurately record the time they begin and end their workday. They should also record the beginning and ending time of any split shift or departure from work for personal reasons. This information should be transferred to their timesheet for submission to their supervisor. For payroll purposes, the workweek begins on Monday and ends on Sunday. Time sheets are due to the supervisor by the end of the day every other Friday. Pay periods are two work weeks.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Non-exempt employees should report to work no more than 10 minutes prior to, and not after their scheduled starting time, nor stay more than 10 minutes after their scheduled stop time without expressed, prior authorization from their manager.

It is the employee's responsibility to sign their time records to certify the accuracy of all time recorded. The manager will review and then initial the time record before submitting it for payroll processing. In addition, if corrections or modifications are made to the time record, the manager must verify the accuracy of the changes by initialing the time record.

Overtime work must always be approved by the manager before it is performed.

Exempt Timekeeping

Exempt employees are required to keep accurate records of PTO time used. This information should be reported via PTO Usage Sheets and submitted to the business manager by the Monday following the close of each pay period.

Payday

Our employees are paid every two weeks, 26 times annually. Paydays, therefore, are every other Friday following the close of the pay period, throughout the calendar year.

Overtime Compensation

There may be times when you will need to work overtime so that we may meet the needs of our customers.

Non-exempt: Non-exempt employees will be paid at the rate of one and one-half times their regular rate of pay for hours worked more than 40 hours in a single workweek. Only actual hours worked are counted in establishing a 40-hour work week.

Overtime is never at the employee's discretion. It shall only be incurred and paid for at the request of the company through the employee's manager. Supervisors/managers shall ensure that no unauthorized overtime hours are worked.

Exempt: Exempt employees are not paid overtime, nor are they granted compensatory time off.

Workplace Guidelines

Code of Conduct

One essential goal of WNL Products is to uphold ethical standards in all our company activities. Each employee has an obligation to observe and follow the company's policies and to always maintain proper standards of conduct. If an individual's behavior interferes with the orderly and efficient operation of a department, corrective disciplinary measures will be taken.

Disciplinary action may include verbal warning, written warning, suspension with or without pay, and/or dismissal. The appropriate disciplinary action will be determined by the company. The company does not guarantee that one form of action will necessarily precede another.

The following may result in disciplinary action, up to and including dismissal: violation of the company's policies or safety rules, insubordination, unauthorized or illegal possession, use or sale of alcohol or controlled substances on work premises or during working hours, while engaged in company activities or in company vehicles; unauthorized possession, use, or sale of weapons, firearms, or explosives on work premises; theft or dishonesty; physical harassment; sexual harassment; disrespect toward fellow employees, visitors or other members of the public; performing outside work or use of company property, equipment or facilities in connection with outside work while on company time; poor attendance or poor performance. These examples are not all-inclusive. We emphasize that dismissal decisions will be based on assessment of all relevant factors.

Nothing in this policy is designed to modify our employment-at-will policy.

Customer and Public Relations

WNL Products' reputation is built on excellent service and quality work. Maintaining this reputation requires the active participation of every employee.

The opinions and attitudes that customers have toward our company may be determined for a long period of time by the actions of one employee. It is sometimes easy to take a customer for granted, but if we do, we run the risk of losing not only that customer, but their associates, friends, or family who may also be customers or prospective customers.

Each employee must be sensitive to the importance of providing courteous treatment in all working relationships.

Workday

Business hours at WNL Products are 8:00 a.m. to 4:30 p.m., Monday through Friday.

Meal and Rest Periods

Meal Period for Non-exempt employees - A 30-minute, unpaid lunch break should be taken each day. Your supervisor or manager is responsible for approving and scheduling lunch periods.

Meal Period for Exempt employees - A 60-minute lunch break may be taken each day. Your supervisor or manager is responsible for approving and scheduling lunch periods.

Rest Period - Each employee is allowed one paid 15-minute rest period for each four hours worked. For every two hours of overtime worked, an additional 15-minute rest period is allowed.

Contact with the Company

The company should always know your location during business hours. You must notify the business manager if you plan on being out of the office during business hours.

On the Job Training

Your supervisor is responsible for initiating all on-the-job training for employees within your department. This may include safety training, participation in off-site training and continuing education when necessary for job safety and work performance. Training will be conducted during regular working hours whenever possible.

WNL Products will pay for any required training programs. Employees may be tested from time to time to evaluate the effectiveness of the training program.

If you have any questions regarding training, you should see your supervisor.

Parking

Employee parking is available on a first-come, first-served basis in designated areas of the Company parking lot. No employee parking is permitted at any time in spaces clearly marked as reserved.

NOTE: Under no circumstances will the company be responsible or liable in any way for property damage to employee-owned cars while parked in the company parking lots. Lock your car and take your keys.

Non-Business or Social Visits

From time to time, it may become necessary for employees to receive visits from a relative or friend. If this occurs, please keep these visits brief and keep them from disrupting the working/professional atmosphere. These visitors must be always accompanied by an employee.

Personal Telephone Use

Personal calls should only be made in case of absolute necessity or emergency. If non-emergency personal calls must be made, please arrange to make them during your break or lunch period.

Employee Privacy

WNL Products recognizes our employees' rights to privacy. In achieving this goal, the company adopts these basic principles:

The collection of employee information will be limited to that which the company needs for business and legal purposes.

The confidentiality of all personal information in our records will be protected.

All in-house employees involved in record keeping will be required to adhere to these policies and practices. Violations of this policy will result in disciplinary action.

Internal access to employee records will be limited to those employees having an authorized, business-related need-to-know. Access may also be given to third parties, including government agencies, pursuant to court order or subpoena.

The company will refuse to release personal information to outside sources without the employee's written approval, unless legally required to do so.

Employees are permitted to see the personal information maintained about them in the company records. They may correct inaccurate information or submit written comments in disagreement with any material contained in their company records.

WNL Products maintains a Written Information Security Program (WISP) which assures security of all personal information of all employees and customers. A copy of the WISP is available upon request.

Attendance and Punctuality

If you are going to be late for work, or absent from work, notify your manager before the start of your workday.

Personal issues requiring time away from work, such as doctor's appointments or other matters should be scheduled during your non-working hours, if possible.

Any employee who fails to report to work for three (3) consecutive days without notice to their manager will be assumed to have resigned and abandoned the job. In such case, the employee will be terminated.

Dress Code and Personal Hygiene

WNL Products asks that while you are at work, you are clean, well-groomed, and dressed appropriately. Radical departure from conventional dress or grooming is not permitted. Clothing that is a distraction to other employees, clothing that results in disruption of the work, and clothing that could cause danger in the workplace will not be permitted.

Housekeeping

Good work habits and a neat place to work are essential for job safety and efficiency. You are expected to keep your place of work organized, and to always keep your materials in good order. Report anything that needs repair or replacement to your supervisor immediately.

Substance Abuse

Our position regarding substance abuse is the same whether the substances are alcohol, marijuana, illegal drugs, or other controlled substances.

"Impairment" or "being impaired" means that an employee's normal physical or mental abilities, or faculties, while at work have been detrimentally affected by the use of substances.

The employee who begins work while impaired or who becomes impaired while at work, or who consumes alcohol, marijuana, or controlled substances while at work, including meal and break periods, is guilty of a major violation of company rules and is subject to severe disciplinary action. Severe disciplinary action can include suspension, dismissal, or any other penalty appropriate under the circumstances. Likewise, the manufacture, use, possession, transfer, or sale of any substance on company premises or in any WNL Products parking lot, storage area, or job site is prohibited. Violations are subject to severe disciplinary action. In all instances, the disciplinary action to be administered shall be at the sole discretion and determination of the company.

When an employee is involved in the manufacture, use, possession, transfer, or sale of a substance in violation of this policy, the company may notify appropriate authorities. Such notice will be given only after such an incident has been investigated and reviewed by the employee's manager, the human resources representative, and the president.

Any employee who suspects a substance abuse case should discuss the situation immediately with their manager.

Alcoholic beverages shall not be served or used on WNL Products premises at any time.

Social activities held off-premises and paid for on a personal basis are not affected by this policy. If management considers it appropriate, light alcoholic beverages may be served at company-sponsored events held off premises and for purely social reasons.

The company is concerned with its employees' privacy. As long as the information is not needed for police or security purposes, the company shall maintain employee medical and personal information in confidence. Release of this information to authorized company personnel will be on a "need to know" basis. An exception to this policy is when the employee signs a release for the transfer of such information on forms acceptable to the company to designated persons or agencies.

The company reserves the right to take any and all appropriate and lawful actions necessary to enforce this substance abuse policy including, but not limited to, the inspection of company-issued lockers, desks, or other suspected areas of concealment, as well as an employee's personal property when the company has reasonable suspicion to believe that the employee has violated this substance abuse policy.

NOTE: Nothing contained in this policy shall eliminate or modify the company's right to terminate any employee at any time for any reason.

Solicitation

No solicitation (commercial or otherwise) by employees or outside vendors is permitted on WNL Products grounds or in any of the company facilities except by authorized representatives or authorized vendors approved by management. All vendors must secure permission from the appropriate manager prior to solicitation. All outside vendors are prohibited from selling their products and/or services unless special permission is given by company management.

Employee distribution of literature, including handbills, in work areas is always prohibited.

Workplace Safety and Security

Employee Safety

Our employees are a critical part of the success and growth of our company. Therefore, management is very concerned for the safety and well-being of its employees (and visitors), and is committed to providing a safe work environment. Accident prevention is a matter of prime concern. Each employee, supervisor, and manager must practice safety awareness by thinking defensively, anticipating unsafe situations, and reporting unsafe conditions immediately.

The following policy has been established to ensure that unnecessary and costly employee and visitor injuries will be prevented.

- All employees must recognize that safety is a serious responsibility.
- All visitors must be accompanied by an employee at all times, and at no time should visitors be allowed into any area which may be considered dangerous.
- All individuals who supervise, direct or control the work of others are responsible for each employee under their supervision and should make certain that all employees work in a safe environment.
- Safe working conditions are to be maintained at all times.
- Use, adjust, and repair machines and equipment only if you are trained and qualified to do so.
- Lift objects carefully, using a safe technique, and do not lift heavy objects alone.
- All employees must understand their job fully and follow all safety instructions.
- All employees are to be thoroughly and properly trained in safe work methods and must understand the importance of following safe work methods and adhering to those methods daily.
- Employees must immediately notify their supervisor of an emergency or dangerous situation.
- Employees must immediately notify their supervisor if they are injured or become sick at work.
- All employees must know the location, contents, and use of first aid and firefighting equipment.
- The unauthorized use of alcoholic beverages or illegal substances prior to, or during work hours will not be tolerated. The possession of alcoholic beverages or illegal substances on the company's property is forbidden.

A violation of safety precautions is in itself an unsafe act. A violation may lead to disciplinary action, up to and including discharge.

Injured On the Job

If you are injured in the job, notify your supervisor immediately. You/your supervisor must then contact a human resources representative. You must also complete an injury report.

If you require medical attention, contact your supervisor or other appropriate manager prior to going to a medical care provider.

Provide both your supervisor and WNL Products with medical documentation of your initial work status and any subsequent changes to it. Your authorized medical care provider must support, in writing, all injury-related time away from work.

When the medical care provider permits you to return to work, you must be willing and available to return to the workplace (regardless of your assigned limitations or restrictions).

Workplace Search Policy

To safeguard our employees, their property, our customers and our property, and to enforce our policies prohibiting misconduct, including theft and the unlawful use or sale of illegal drugs or alcohol, management may question employees and/or inspect any personal property or any area from which WNL Products conducts business, including any leased spaces and facilities. (For example: briefcases, suitcases, tool boxes, computer bags, backpacks, lunch boxes, purses or any other container or object brought to and from WNL Products offices, property, worksites or WNL Products-sponsored functions) whenever there is reasonable suspicion to believe that any WNL Products policy is being, or has been, violated.

WNL Products may provide offices, desks, vehicles, computers or computer containers, lockers, tools and other items for the use of WNL Products employees. At all times, these items remain the property of WNL Products. WNL Products may also search any work area and/or item whenever there is reasonable suspicion to believe that a WNL Products policy is being, or has been, violated. Employees are expected to cooperate with WNL Products' workplace searches.

Violations of this policy are subject to disciplinary action, including, in the discretion of WNL Products, immediate termination. Employees with questions regarding this policy should contact the business manager or a human resources representative.

Smoking

WNL Products is committed to providing a safe and healthy environment for employees and visitors. Therefore, smoking is not permitted inside any of our buildings. Smoking is only permitted outdoors in designated areas, out of the view of customers and other visitors.

E-cigarettes or any other vaping devices should not be used indoors or in any customer area.

This policy applies equally to all employees, customers and visitors.

Emergency Closings

At times it may be necessary for WNL Products to declare specific hours or days as an emergency closing due to inclement weather or other emergency conditions.

Some closings may still require that essential personnel report to work. Essential personnel are those employees identified by the employing department who are required to work to keep certain operations going.

Decisions to close the company will be made by the president or other authorized personnel. Supervisory personnel will be notified, who, in turn, will notify employees of the emergency closing, and any details related to the closing.

Non-exempt employees will not be paid for days when the office is closed due to inclement weather or emergency. A non-exempt employee may, however, use accrued PTO time to be paid for the day. Exempt employees will receive pay for days that the office is closed due to inclement weather or emergency.

If an employee does not report to work in any situation, such as inclement weather, in which WNL Products is not closed, that employee will be assessed available PTO time. If the PTO balance is zero or negative, the day shall be regarded as unpaid personal leave.

Workplace Violence

WNL Products is committed to maintaining a safe environment for all staff and visitors and will not tolerate any form of workplace violence committed by or against its employees. Any observed or reported form of workplace violence will be taken seriously and thoroughly investigated. Any confirmed offenders will be dealt with through the current Company disciplinary process, and local law enforcement procedures, as appropriate.

Workplace Violence Defined

Workplace violence includes, but is not limited to, the following: harassment; stalking; physical violence; the use of weapons of any kind; the direct or implied threat of physical violence toward any member of the staff, visitors, or customers of WNL Products.

Reporting Workplace Violence

If you receive or overhear any threatening communications from an employee or outside third party:

- Report the incident or situation to a manager or the business manager immediately
- Do not physically or verbally confront a potentially violent individual.
- Contact an emergency agency (such as 911) if you encounter an individual who is threatening immediate harm to an employee or visitor.

Reports or incidents warranting confidentiality will be handled appropriately. Employees are expected to report and participate in the investigation of any suspected or actual cases of workplace violence.

Violation of the Policy

Violations of this policy, including your failure to report or fully cooperate in the company's investigation, may result in disciplinary action, up to and including immediate discharge.

Concealed Weapons

Possession, use, or sale of weapons, firearms, or explosives on work premises, while operating company machinery, equipment, or vehicles for work-related purposes or while engaging in company business off-premises is forbidden except where expressly authorized by the company and permitted by state and local laws. This policy applies to all employees, including, but not limited to those who have a valid permit to carry a firearm.

Employees who are aware of violations or threats of violations of this policy are required to report such violations immediately,

Violations of this policy will result in disciplinary action up to and including discharge.

Workplace Emergency Instructions

A workplace emergency is an unforeseen situation that threatens employees, visitors, or the public; disrupts or shuts down your operations; or causes physical or environmental damage.

Emergencies include but are not limited to the following:

- Medical Situations
- Floods
- Hurricanes
- Fires
- Gas releases
- Chemical spills

- Explosions
- Workplace violence
- Acts of terror

In the event of a fire alarm, or when you are instructed to leave the building:

- Stop working immediately and, if time permits, quickly turn off computers, equipment, fans, etc., and close desk drawers.
- Follow instructions, avoid panic, and cooperate with those responding to the emergency.
- Proceed to the designated or nearest exit and assemble in the predetermined location as communicated to you by your supervisor to await further instructions or information.
- Do not delay your exit from the building by looking for belongings or other people.
- When leaving the building, go to a clear area well away from the building. Do not obstruct fire hydrants or the responding fire/rescue workers and their equipment.
- Do not re-enter the building until you are instructed to do so by your supervisor or fire/rescue worker.
- In the event of other emergencies, such as accidents, medical situations, threats of violence, and the smell of smoke:
- Notify your supervisor or manager immediately.
- Follow instructions, avoid panic, and cooperate with those responding to the emergency.

If an emergency results in the need to communicate information to employees outside of business hours, your direct supervisor will contact you. It is important that employees keep their professional emergency contact information up to date. Notify your direct supervisor in the event this information changes.

E-Policies

General Principles

This policy makes it clear that WNL Products owns and controls all workplace technology and therefore all communications and activity conducted over it. Authorized use of WNL Products-owned or operated computing and network resources shall be consistent with the mission of WNL Products and consistent with this policy. Underlying this policy is the idea that each employee has a responsibility to use the company's information technology resources in a manner that increases productivity, enhances the company's public image, and is respectful of other employees.

Information Technology Resources Defined

Information technology resources consist of all electronic devices, software, and means of electronic communication including, but not limited to, the following: personal computers and workstations; lap top computers; mini and mainframe computers; computer hardware such as disk drives (local and portable), USB flash drives, and tape drives; peripheral equipment such as printers, modems, fax machines, and copiers; computer software applications and associated files and data, including software that grants access to external services, such as the Internet; electronic mail; telephones; cellular phones; pagers; blackberries; PDAs; Smartphones; USB devices; and voicemail systems.

Permitted General Access

Generally, employees are given access to the company's various technologies based on their job functions. Only employees whose job performance will benefit from the use of the company's information technology resources will be given access to the necessary technology. Additionally, employees must successfully complete company-approved training before being given access to some of the company's information technology resources. Authorized users of WNL Products' computing and network resources include those who may not work for the company, but whose access has been authorized by management. Access, passwords, and e-mail accounts are granted by management of WNL Products and therefore access to the systems can also be denied by management.

In subsequent sections, this policy defines unacceptable uses of the information technology resources of the company in more detail. The Company reserves the right, upon reasonable cause for suspicion, to access all aspects of its computing systems and networks, including individual login sessions to determine if a user is violating this policy or state or federal laws.

User Responsibilities

Privacy

No user should view, copy, alter, or destroy another's personal electronic files without permission (unless authorized or required to do so by law or regulation). In addition, users should not have an expectation of privacy. The information technology system belongs to the company. Users expressly waive any right of privacy in anything they create, store, send, or receive on the company information technology system.

Sharing of Access

Computer accounts, passwords, and other types of authorization are assigned to individual users and should not be shared with others. You are responsible for any use of your account. If an account is shared or the password divulged, the holder of the account will lose all account privileges and be held personally responsible for any actions that arise from the misuse of the account.

Prohibited Use

Abuse of WNL Products' computer resources are prohibited and included, but are not limited to:

- Game Playing
- Chain Letters
- Faxing
- Harassing, Discriminatory, and Defamatory use
- Gambling
- Online Shopping
- Unauthorized Monitoring
- Flooding or Spamming
- Private Commercial Purposes
- Political Advertising or Campaigning
- Software Piracy
- Use of Unlicensed Software
- Pornography

General e-Policies

Blogging and Instant Messaging (Chat) Policy

Blogging and instant messaging can become a drain on work time and can cause liabilities for both the company and the employee.

Employees of WNL Products are allowed to “blog” or e-chat during working hours as long as the activity is job related.

As an employee, you must make it clear that the views expressed in the blog or chat are yours alone and do not necessarily represent the views of your employer. In addition, please adhere to the following blogging and instant messaging guidelines:

- Do not reveal confidential and proprietary information.
- Ensure that blogging does not interfere with work requirements.
- Consult with immediate supervisor if questions arise about appropriateness of blog content.

Other Prohibited Uses:

Employees may not use any of the company's information technology resources for any illegal purpose, violation of any company policy, in a manner contrary to the best interests of the company, in any way that discloses confidential or proprietary information of the company or third parties, or for personal gain.

Acceptable E-mail Usage

The use of e-mail is reserved primarily for business use. However, under some circumstances, WNL Products' e-mail systems can be used to send and receive messages to and from children, spouses, domestic partners, and immediate family. However, the time involved in such activity should be limited so that it does not interfere with job productivity.

E-mail Passwords

Only authorized employees issued e-mail passwords are permitted to use passwords to access their own e-mail accounts. Only authorized employees are permitted to use the password of another employee to access that employee's e-mail account. Misuse of passwords and the unauthorized sharing of passwords will result in disciplinary action, up to and including termination.

Forwarding E-mails

Users may not forward e-mail to others without the express permission of the sender. The express permission is necessary since frequently e-mail contains confidential, proprietary, and trade secrets. All employees must consider that e-mail messages meant for a single reader may not be meant for widespread distribution.

Confidential and Sensitive Information via E-mail

Sending via e-mail proprietary information, trade secrets, or other confidential information of the company is strictly prohibited. This type of information is an asset of the company. Unauthorized dissemination of this type of information may result in civil liability as well as criminal penalties. E-mail messages are like paper documents. Client-related e-mail messages should be carefully guarded and protected. Before sending an e-mail message every employee should think about how a third party to the message might interpret the message.

Management Access to Technology Resources

Information Assets are Company Property

All messages sent and received, including personal messages, and all data and information stored on the company's electronic mail system, voicemail system, or computer systems are company property regardless of the content. As such, the company reserves the right to access all of its information technology resources including its computers, voicemail, and electronic mail systems, at any time, at its sole discretion.

Employee Privacy

Although the company does not wish to examine personal information of its employees, on occasion, the company may need to access its information technology resources including computer files, electronic mail messages, and voicemail messages. Employees should understand, therefore, that they have no right of privacy with respect to any messages or information created or maintained on the company's technological resources, including personal information or messages. The company may, at its discretion, inspect all files or messages on its information technology resources at any time for any reason. The company may also monitor its information technology resources at any time to determine compliance with these policies, for purposes of legal proceedings, to investigate misconduct, to locate information, or for any other business purpose.

Employees should assume that any communication - whether business related or personal - that they create, send, receive, or store on the company's information technology resources may be read or heard by someone other than the intended recipient. Highly confidential or sensitive information should not be sent through e-mail, or the Internet.

The company reserves the right to keep an employee's e-mail address active for a reasonable period of time following an employee's departure from the company to ensure that important business communications reach the company. WNL Products will review such communications and send any appropriate personal communications to the former employee if forwarding information is provided at termination.

Monitoring

WNL Products has the right to monitor all usage of its computer systems including (but not limited to) sites visited by users on the Internet, chat groups, and newsgroups, and downloaded or uploaded software. All employees must be aware that the company may use automated software to monitor documents created, stored, sent, or received.

Passwords

Some of the company's information technology resources can be accessed only by entering a password. Passwords are intended to prevent unauthorized access to information. Passwords do not confer any right of privacy upon any employee of the company. Thus, even though employees may maintain passwords for accessing information technology resources, employees must not expect that any information maintained on the information technology resources, including electronic mail and voicemail messages, are private. Employees are expected to maintain their passwords as confidential. Employees must not share passwords and must not access coworkers' systems without express authorization.

Data Collection by the Company

The best way to guarantee the privacy of personal information is not to store or transmit it on the company's information technology resources. To ensure that employees understand the extent to which information is collected and stored, below are examples of information maintained by the company. The company may, however, at its sole discretion, and at any time, alter the amount and type of information that it retains.

Telephone Use and Voicemail

Records may be kept of all calls made from and to a given telephone extension. Although voicemail is password protected, an authorized administrator can reset the password and listen to voicemail messages.

Electronic Mail

Electronic mail may be backed up and archived. Although electronic mail is password protected, an authorized administrator can reset the password and read electronic mail.

Desktop Facsimile Use

Copies of all facsimile transmissions sent and received may be maintained on a facsimile server.

Document Use

Each document stored on the company computers has a history, which shows which users have accessed the document for any purpose.

Internet Use

The number of Internet sites visited, the number of times visited, and the total time connected to each site may be recorded and periodically monitored.

Deleted Information

Deleting or erasing information, documents, or messages maintained on the company's information technology resources is, in most cases, ineffective. All employees should understand that any information kept on the information technology resources may be electronically recovered regardless of whether it may have been "deleted" or "erased" by an employee. Because the company periodically backs up all files and messages, and because of the way in which computers re-use file storage space, files and messages may exist that are thought to have been deleted or erased. Therefore, employees who delete or erase information or messages should not assume that such information or messages are confidential.