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CLOW STAMPING COMPANY

This employee information booklet is intended as a general reference and not as a full statement of Company policies and procedures. The Company reserves the right to amend, modify, add to, eliminate, delete, or otherwise change the handbook at any time, with or without notice to the employees, and to interpret these policies and procedures at the discretion of the Company.

No provision in this handbook is intended to create a contract between the Company and employee or to limit the rights of the Company and its employees to terminate the employment relationship at any time, with or without notice and with or without cause. The Company has the right in its sole discretion to apply or not apply the policies or procedures contained in this handbook, depending upon the facts and circumstances of each case. This handbook is not necessarily all-inclusive. Circumstances that the Company does not anticipate may arise. Unanticipated circumstances may warrant actions or conduct not stated in this handbook.

This handbook supersedes and revokes all prior handbooks.

Clow Stamping Company is an equal opportunity employer. We do not discriminate on the basis of race, creed, color, age, gender, religion, national origin, disability, marital status, sexual orientation, genetic information, status with regard to public assistance, membership or activity in a local human rights commission, or any other characteristic protected under federal, state or local law.

CLOW STAMPING COMPANY'S COMMITMENT TO EMPLOYEES

Clow Stamping is committed to having a direct, positive relationship with every employee. We are committed to treating every employee with dignity and respect, while providing a desirable work place and competitive wages and benefits. The bottom line is, we want to make Clow Stamping Company a great place for all of us to work. We want to help you and every other employee feel "part of the team", while also resolving any mistakes or misunderstandings which may arise in the workplace. Please keep the following in mind:

Have a complaint? Here's how to get it resolved

We're all human, and like everyone will make mistakes or have misunderstandings from time-to-time. When that happens, we want to fix our mistake or correct the misunderstanding whenever possible. That's why we have a "Grievance Procedure". We're proud of that procedure, through which you can take a complaint all the way to the Company President. We don't want any complaint to fester or go un-addressed. While we may not always be able to give you the answer you want, we guarantee that your complaint will always be carefully considered and given a prompt response. (See Grievance Policy)

Have a Suggestion? Let's hear it

We're also interested in your thoughts and suggestions regarding how we can improve our plant, our work lives, our production procedures or any other aspect of working at Clow. Whenever you have a suggestion, please sign it and place it in one of the Company suggestion boxes. Your signature enables us to contact you for discussion or clarification of your suggestion. (See Suggestion Box information in a later section of this handbook)

A Few Words About Unions

During the last several decades, the number of American employees who are represented by unions has steadily declined. That's because many employers, like Clow Stamping Company, are committed to providing employees with a good working environment.

Clow Stamping Company strives to treat its employees well and to pay its employees competitive compensation and benefits without the necessity of a union.

We hope that you will always come to us with your concerns, questions and complaints, and will work with us to get them straightened out. Let's work together.

CLOW STAMPING COMPANY PRINCIPLES AND GUIDELINES

Integrity – We have integrity with all our fellow workers, subordinates and peers, as well as our customers and suppliers. This includes never using half truths, partial truths or misleading statements.

Teamwork – We work in teams that include co-workers, customers and suppliers. All members of the team are kept informed. Everyone is responsible. “Not my job” is not spoken here. Everyone is responsible for everyone else. We are dependant on one another to get the job done and we will not let our fellow employees down. Asking for assistance and utilizing all of our resources is encouraged.

Safety and Respect – All employees, customers and suppliers are treated with respect. Safety and well being is very important. We keep a safe and clean work environment. We speak positively about our customers, co-workers and the parts we manufacture.

Accountability – All employees are accountable for themselves and the employees they may manage. This includes meeting deadlines and targets. Each of us is responsible for the financial health of Clow Stamping Company, which means we will comply with a customer’s request but make sure that if there is a cost involved we consciously decide whether or not to pass it on to the customer.

Problems Solving – We strive daily to improve processes and ourselves, and we make sure we align our personal goals and the organization’s goals. We look at processes, not the individual, if we need to address a problem. We believe every problem can be solved. We are flexible. The best solution is the one that is cost effective and safe using simple changes to procedures and processes as well as technology.

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**CLOW STAMPING COMPANY
SUPPORT STAFF**

CHIEF EXECUTIVE OFFICER / OWNER

Reginal Clow

PRESIDENT

Lori Davies

CONTROLLER

Christopher Lueck

ACCOUNTING

Nancy Jendro - Payroll Administrator

Carolyn Owen - Accounts Receivable Supervisor

Krista Collins - Accounts Payable Coordinator

CUSTOMER SUPPORT

Amy Engholm - Customer Support Manager

Jill Vice – Customer Support Supervisor

Jenny Nelson – Production Planner

ESTIMATING AND TECHNICAL

Rusty Laney - Estimating Manager

Russ Doucette – Estimating Assistant Manager

Cassi Sjodin – Estimating Assistant

INFORMATION TECHNOLOGY

Darin Owen – IT Manager

MAINTENANCE

Greg Fuhrman - Maintenance Manager

Jeff Wohl - Maintenance Supervisor

PERSONNEL

Twyla Flaws - Personnel Manager

Robin Loftis - Human Resources Generalist

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Mike Tollefson – Human Resources Generalist
Kathy Storry - Human Resources Support
Doug Buehl - Risk Manager

PRODUCTION

Steve Allen - Production Manager
Steve Bible - Welding Supervisor
Bruce Lehrke - Raw Material Supervisor
Dan Vannurden – Tool Storage Supervisor
John Smith - First Shift, Press Room Supervisor
Justin Gilbertson - Second Shift, Press Room Supervisor
James Johnson - Third Shift, Press Room Supervisor

PURCHASING

Lyle Olson - Materials Manager

QUALITY

Eric Mitchell - Quality Manager
Don Willard - Quality Department Supervisor

SALES AND MARKETING

Larry Rono - Sales and Marketing Manager
Mitchell Nelson - Sales and Marketing Assistant

SHIPPING

Dave Leonard - Shipping Manager
Tim Spaid – Assistant Manager
Troy Sibbert - Shipping Supervisor – First Shift
Greg Borst - Shipping Supervisor – Second Shift
Charles Afagwu - Shipping Supervisor – Third Shift

TOOL ROOM

Mike Clasen - Tool Room Manager
Joe Goble - Tool Room Supervisor

COMPANY HISTORY

Clow Stamping Company began operation in 1970 and has experienced substantial growth through quality, customer service, productivity, and above all, working smart and working together.

Clow Stamping Company is a job shop, metal fabricating company. Job shop is the term used in the manufacturing industry to describe a company that builds component parts for other companies that have their own product lines. Profits of any company are directly related to the competition that a company has in its field. The competition between job shops in the metal fabrication business is very fierce; therefore, the profit of any job shop is directly related to the amount of production in any given period. Clow Stamping Company gives its customers a firm price before it receives an order. That price is based on the amount of material used and the outside services performed. These are the uncontrollable portions of our firm price. The hours of production are the only controllable portion of our pricing structure.

Price, quality and delivery are the three primary considerations used by prospective customers when choosing Clow Stamping Company, or one of our competitors, to supply their products.

Company profit, employee wages and benefits are determined by the amount of production performed by Clow Stamping Company employees in each producing hour. A poor producing hour is a cost to the Company and affects profit and employee wages and benefits. The Company cannot increase the cost of the parts supplied to customers after an order is received. (Your plumber or service station mechanic is able to charge his customer for the time it takes him to do his job. Clow Stamping Company sets the price before the job; and if it takes longer because of poor production, the job actually costs the Company, and ultimately the employees, money).

ATTENDANCE

It is essential for Company success and employee job security that the Company meets production schedules on time. In order to accomplish this objective, regular and prompt attendance at work is required of all employees.

- Employees are expected to be on time. Continued lateness or absences will not be tolerated and may result in employee dismissal.
- Employees must fill in their own time edits or clock into the Computer system when they start or stop work. Anyone attempting to sign edits or clock in or out for another employee may be dismissed.
- Anyone found cheating on his/her time edit may be subject to immediate dismissal.
- If an employee forgets to sign or punch in or out, the employee should notify their supervisor as soon as possible.

EXCUSED ABSENCES

Excused days are an unpaid discretionary employee benefit.

Each production employee will receive excused time per the schedule below for use each calendar year. As vacation time accrues, excused time will be reduced.

Excused days requested shall be determined as closely as practical by seniority. Thereafter, it is determined on a "first to request" basis. Available excused hours that may be used in any week are determined by the work load in each department. If possible, excused time should be requested twenty four (24) hours in advance.

New production employees will receive 32 hours of excused time at the time of hire.

Length of Service	Full Time	Half Time
Less than 1 year	1.24 hours	0.62 hours
1 year	2.47 hours	1.24 hours
2 years	2.16 hours	1.08 hours
5 years	1.85 hours	0.93 hours
12 years	1.54 hours	0.77 hours
19 years	1.24 hours	0.62 hours

This is equivalent to approximately the following on an annual basis:

Length of Service	Full Time	Half Time
Less than 1 year	32 hours	16 hours

1 year	64 hours	32 hours
2 years	56 hours	28 hours
5 years	48 hours	24 hours
12 years	40 hours	20 hours
19 years	32 hours	16 hours

The maximum excused time balance allowed is 128 hours.

Employees who transfer from production to office, and newly hired office employees will have their excused time balance set to 32 hours. Office employees do not accrue additional excused time.

Absences in excess of hours available for use will be considered unexcused.

Excused time will not be earned when you are unable to work due to disability, lay off, leave of absence or work related injury.

USE OF EXCUSED TIME HOURS

If it is necessary for you to be absent, it is your responsibility to notify your supervisor at once. The office is open from **7:30 A.M. - 4:00 P.M.** to receive your call. The telephone number is **(218)765-3111**. The number to call after 4:00 PM is **(218)765-3388**. If voice mail answers your call, leave a message at your supervisor’s extension.

Failure to request an excused absence, or to report an absence in the manner described above, may result in the absence being recorded as unexcused.

An employee who fails to call to report an absence for three successive days, shall be deemed to have voluntarily terminated their employment with the Company.

Absences that “count against” excused hours:

Illness, personal time, medical appointments, family emergency, banking or legal appointments, weather, car problems, day care problems, funeral (if it does not qualify as a paid funeral benefit), wedding, court appointment, and jail. There may be reasons in addition to this list.

Absences that “do not count against” excused hours:

Military leave, jury duty, doctor approved disability, FMLA qualified absence, doctor slip for illnesses more severe in nature than a routine sick day or illness and that states “unable to work”, leave of absence, paid funeral days, school conferences, paid vacation, paid sick day, paid holiday, time taken by father for birth of his child (if FMLA qualified), time taken by firefighters and first responders for meetings, fires, and rescues.

- A doctor slip must state “unable to work”. If it only verifies a doctor appointment/visit, it will be counted as one of the excused absences.
- A absence of more the 30 missed work days (or 120 intermittent hours) will require a General medical physician signature beyond that of a chiropractor or physical therapist.

Using one of the pre-approved excused absence days before or after a Holiday will qualify an employee for Holiday pay. (See Holiday Policy)

EMERGENCY ABSENCE

During the first 12 months of employment, employees may request up to 12 days of unpaid leave for absences that would be covered by FMLA, if they were eligible.

After 12 months of employment, employees must request FMLA and are no longer eligible for the “Emergency Absence”.

Employees must submit a request form to Human Resources. Verification from a physician or other agency of authority may be required.

LATE ATTENDANCE

If you are late more than six times in a calendar year, you will receive a warning slip for tardiness. (If you work less than six months in a calendar year, you will receive a warning slip if tardy more than 3 times)

WARNING SLIP PROCEDURE FOR: LATE / TARDY / EXCESSIVE ABSENCE

If an employee uses all of his available excused time, he will receive a warning slip for the next unexcused absence.

If an employee is late in excess of the time allowed in the late policy, he will receive a warning slip. (See “warning notices”)

1. Warning is a verbal warning notice
2. Warning is a “first written” notice (Production employees will receive one day off without pay if the first verbal warning was for an absence violation.)
3. Warning is a “second written” notice (up to 3 days off without pay)
4. Employee is terminated

All warning slips issued, for any reason, will be combined when calculating an employee warning slip process.

- These warnings are based on a revolving twelve month period of time.

Example:

June 6, 2010 – first verbal warning
September 2, 2010 – first written warning
November 12, 2010 – second written warning
July 10, 2011 – warning received

- The July 10 warning will not be a termination of employment. The June 6, 2010 warning was effective only until June 6, 2011. The July 10 warning will move to the position of a second written warning and the employee may again receive three days off without pay rather than a termination.

Clow Stamping Company reserves the right, by their sole discretion, to apply this warning slip procedure on a case by case basis and to deviate from it whenever the situation, in the sole and exclusive opinion of the Company, requires it.

OVERTIME ATTENDANCE

Mandatory and voluntary overtime will be viewed as part of your over-all attendance record.

Requested and approved absences for a mandatory overtime work day will not qualify as one of the “excused absence” days. However, calling in will require use of an excused absence day.

It is acceptable to have another employee work your mandatory overtime day, providing it is pre-approved by your supervisor and the necessary absence report forms are signed. (You will not use one of your “excused days” if another employee works for you on your mandatory overtime day.)

MANDATORY OVERTIME ATTENDANCE

Employees are expected to work on the days and hours declared mandatory.

Overtime hours worked for each employee will be verified and approved by their supervisor and submitted to payroll.

Prior approval for time off from mandatory overtime, whether in whole or in part, may be granted at the discretion of the Supervisor or Manager.

VOLUNTARY OVERTIME ATTENDANCE

Employees who agree to work voluntary overtime are expected to work all hours for which they volunteered.

Overtime hours worked for each employee will be verified and approved by their supervisor and submitted to payroll.

(See Overtime Policy for overtime wage information)

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TEMP TO HIRE EMPLOYEES

If a full time temp employee takes time off while on probation through the temp agency, it will be noted on attendance tracker.

If a full time temp employee has absences, their hiring may be postponed or they may fail to make hiring standards and a job offer may not be given.

Full time temp employees will receive the same excused days when hired to Clow payroll as any direct hire production employee, regardless of days missed while they are a full time temp employee.

WARNINGS

If a weekend temp or full time temp employee receives a warning while working at Clow Stamping (probation), the warning will be noted in the warning tracker. Warnings will follow an employee when they are hired and those warnings will be applied to the employee's record in regard to Company Warning and Policies and Procedures.

HR will send the Temp Agency a copy of any warnings that are issued to their employees.

BULLETIN BOARDS

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Notices that affect employees will be posted on Company approved bulletin boards. This generally includes information on safety, job postings, and policy changes, unless distributed by a payroll stuffer.

Job postings will appear on the bulletin boards outside the Maintenance Room wall, outside the office lunch room, and in the "north" employee lunchroom.

Several bulletin boards are available for employee use in posting sale items, etc. Only appropriate, non-offensive literature can be posted.

Do not remove postings placed by another employee.

CAFETERIA PLAN

Clow Stamping Company offers a Flexible Benefits Plan (also known as Cafeteria Plan). Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager computers and training computers throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

COMMUNICATION

Clow Stamping Company recognizes the importance of the security of technological infrastructures, which encompass software, network, systems and equipment and telecommunication facilities. This policy applies to all Clow Stamping employees, contractual partners, business groups, consultants and visitors using Clow Stamping Company provided access both physical and logical.

All users must agree to follow the Clow Stamping Company Acceptable Use Policy in order to be provided with access to a network, software system or to the internet.

This AUP addresses:

- Preventing confidentiality breaches of information
- Inhibiting employee lost productivity
- Maintaining system efficiency
- Averting content security / integrity violations
- Violating copyrights protection
- Hardware use
- Breaching of legislation

ACCEPTABLE USE POLICY

(This policy covers the wired and wireless network access)

INTERNET

Clow provided internet/intranet are considered company resources and are intended for business purposes only.

Use of the internet may be subject to monitoring and a user should have no expectation of privacy to his or her internet usage. Clow may monitor and record all internet usage and may record all activity. Clow may also block access from any source/computing resource it finds to be inappropriate.

The following activities are strictly prohibited while using the internet:

Visiting sites or sending or receiving any material that contains obscene, defamatory, hateful material or which is intended to annoy, harass or intimidate another person via Clow Stamping Company's Microsoft Exchange email, personal email and/or instant

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messaging, otherwise objectionable materials or that are in violation of any company policy.

Uploading, downloading or otherwise transmitting commercial software or copyrighted material in violation of its copyright.

Downloading large files from the internet that overload the network and increase the risk of system failure.

Downloading applications / files that may contain viruses or malicious codes

Representing personal opinions as those of the company

Sending Clow Stamping Company proprietary information for personal benefit

Sending or receiving information that does not comply with the Clow Stamping Company policies and handbook.

Using internet features in a manner intended to cause harm or embarrassment to Clow and its affiliates.

Accessing the internet from systems having sensitive data or applications.

Violating local, state or federal statute or law including use for gambling or other illegal activities.

Intentionally interfering with normal operation of the network, including the propagation of computer viruses, or sustained high volume network traffic that substantially hinders others in their use of the network.

Installing software, regardless of source, is prohibited and subject to approval by the IT Manager or designated representative.

Live streaming of audio and video files is prohibited.

Intentionally or attempting to disable and/or bypassing of Clow Stamping Company IT controls and security measures.

Unauthorized use of the internet that impacts work patterns and productivity of an employee

Other inappropriate uses of internet/intranet or network resources that may be identified by the IT Manager or that may be in violation of any company policy or procedure.

E-MAIL

Clow Stamping provided e-mail is considered a company resource and is intended for business purposes only. Occasional use of the company resource for personal use is permitted assuming the amount of time spent on personal purposes is reasonable, does not interfere with the user's or company productivity and the user refrains from activity that is in violation of company policies or procedures.

Correspondence via e-mail is not private and the use of the e-mail may be subject to monitoring.

All e-mail communications will be scanned for the content of messages to prevent spread of viruses, worms, Trojan horses, or other executable items that could pose a threat to the security of the system or network. All e-mail communication may be scanned or copied to prevent the misuse of sensitive information, such as, but not limited to, financial information, Personally Identifiable Information, and Clow Stamping Company intellectual property. Clow Stamping reserves the right to determine suitability of this information and filter it as appropriate.

All e-mail messages created, sent and received are, and remain, the property of Clow Stamping Company and the company may access, review, copy, print, delete or disclose any email message composed, sent or received using the Company's computer and communication systems.

All e-mail communication is considered public communication, not private, and all e-mail communications may be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

SENDING / FORWARDING ELECTRONIC MAIL

The following activities are prohibited while sending / forwarding email.

Misrepresentation using the corporate e-mail system and/or addresses for personal gain.

Transmission of viruses and malicious data causing harm to other users and the corporate network.

Transmission of obscene, hateful or otherwise objectionable materials or any material in violation of the policies of the Clow Stamping employee handbook.

Transmission of any message that supports or solicits others to support illegal or unethical activities.

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Sending sensitive or confidential information by unauthorized users and in an unauthorized fashion.

Sending large files to multiple recipients (over 10 MB) causing congestion of the network and e-mail system.

Sending or forwarding chain e-mails causing potential breach of security and congestion of the network and e-mail system.

Copying, replying or forwarding to large groups on matters with which they may be unconnected.

Sending emails under a false name or an assumed name.

Sending e-mails to all Clow Stamping e-mail users except by executive management.

Spoofing emails to internal or external parties.

E-mail groups that are set up within Clow Stamping Company Outlook must be used only when the whole group needs to be addressed for Clow business purposes and must not be used for one to one communication.

It should be made clear to recipients that opinions expressed by individuals are not necessarily those of Clow Stamping Company or their management. Also, it should be made clear to recipients when information is transmitted by email that it is intended to be kept confidential.

RECEIVING ELECTRONIC MAIL

The following precautions must be exercised while receiving emails:

Suspicious emails received from unknown senders are to be deleted without being viewed or IT personal are to be made aware of the email.

Suspicious files received from unknown senders are to be deleted without being opened.

Unexpected files received from a known sender should remain unopened until acknowledgement by the sender is obtained, otherwise, it should be considered suspicious and unsolicited and be handled accordingly.

Incoming emails containing links to unfamiliar websites should be treated as suspicious and be deleted and must not be responded to.

Incoming emails with attachments must not be opened unless scanned for viruses.

Misdirected / unsolicited email must not be responded to.

Corporate email addresses must not be used for receiving spam / personal subscriptions, etc. The receipt and failure to detect malicious software and intent via email will potentially impact not only the users' computer but also the entire corporate network, and is therefore, to be avoided at all cost.

PASSWORDS

Passwords, along with user IDs are used by authorized users within Clow Stamping for access to the Clow Stamping domain to access email, internet, shared folders, and for access to other Clow IT resources. All PCs, laptops, workstations and hand held devices must be secured with a password along with a password-protected screen saver with an automatic activation feature set at 30 minutes or less. Authorized users are responsible for the security of their passwords.

All passwords and PINs will be governed by the IT Acceptable Use Policy at Clow and must adhere to the following conditions:

A password is valid for 60 days unless changed or deactivated sooner

All passwords must have a minimum length of 6 characters and be a combination of company approved criteria.

Characters must not be consecutive numerals or alphabetic characters

Passwords must not be the same as the users' previous 6 passwords.

Passwords must not comprise the users' first or last name.

Passwords must be closely guarded and must not be shared either internally or externally

Passwords must be memorized and must not be written anywhere obvious to unauthorized persons or other users.

Passwords must never be revealed in e-mails, instant message or text message conversations.

Users may not develop or use programs that attempt to bypass the password mechanisms of Clow Stamping Company.

In addition to these password policies, users must keep their computers and mobile devices locked when unattended; for example, using "Control – Alt – Delete" to lock the computer for Windows users. A 'clear screen' policy must be followed to ensure that no confidential data or information is conspicuously displayed on the user's computer screen while the computer is left unattended.

Temporary passwords for subcontractors and temporary workers must be assigned according to the approved access authorization list. Temporary passwords must be assigned only for the duration of the said assignment and must be terminated upon the completion of the assignment. Passwords of terminated employees must be immediately deactivated by the IT department upon receiving termination notification from Human Resources.

VOICEMAIL

This policy bans any messages that could be seen as offensive or harassing. This includes, but is not limited to, the display or transmission of sexual images and messages, ethnic slurs, racial comments or other inappropriate communication or any communication that violates Clow Stamping Company policy and/or procedure.

Clow Stamping Company forbids the unauthorized access of another employee's email, confidential computer files or voice mail.

TELEPHONE CALLS

The Company recognizes that when all adult members of a household work, there may occasionally be times when personal calls must be made or received during business hours. Such calls must be held to a minimum and must not interfere with the employee's work. Workers are encouraged to make such calls during their breaks or lunchtime. Making a long distance call is prohibited.

Emergency phone calls may be made or received. An emergency is regarded as an illness or a severe injury to a member of one's family, changed plans regarding an employee's transportation home from work, extreme weather conditions, etc.

Long or numerous non-business telephone conversations on unimportant matters may result in discipline. A public telephone is provided in each production lunchroom for employee use (local and toll free calls only).

If you need to receive an emergency telephone call before 7:30 a.m. or after 4:00 p.m., or need to call and talk to a supervisor, the number to use is (218) 765-3388. This number rings in the shop on a speaker system and will be answered. (You may need to let it ring a few times if a supervisor is not close to a telephone).

CELLULAR TELEPHONES

The use of cellular phones for personal use is permitted only at break times.

This policy bans the use of cellular phones for inappropriate communication, and for any

reason that could be seen as harassing. This includes but is not limited to display or transmissions of pictures.

COMPANY PROPERTY

Care of Company Property

1. An employee is expected to exercise care while using Company property and to utilize such property only for authorized purposes. Unauthorized use of Company property or failure to properly care for and maintain Company property may be considered cause for discipline including suspension and/or dismissal.
2. Unauthorized removal of Company property from the premises or its conversion to personal use may be considered cause for discipline including suspension and/or dismissal.

Return of Company Property

Company property issued to an employee must be returned to the Company at the time employment terminates or when it is requested by the department supervisor or the designated representative. The value of any property issued and not returned may be deducted, in accordance with state and federal law, from an employee's pay check.

Personal Property

The Company assumes no responsibility for loss or damage to the personal property of an employee.

Electronic Equipment

All data stored on any Clow provided equipment is the property of Clow. Photos, documents, music files, video files become the property of Clow and employees shall understand that all data is subject to inspection, replication, or deletion.

CONFIDENTIALITY

Each employee has a responsibility to protect confidential information. Confidential information may not be discussed with your relatives, business or social acquaintances, or with other employees, unless they have a clear right or need to know. You may not disclose confidential information during or after employment.

Confidential information includes, but is not limited to:

- **COMPANY INFORMATION:** Financial, marketing and statistical data, Email, voice mail, confidential computer files and production procedures and competitive relationships.
- **CONFIDENTIAL PERSONAL INFORMATION:** Payroll related information, employee disciplinary data, employment termination or investigative action, compensation, benefits and performance data, health related data, or any other personal data.
- **CONFIDENTIAL LEGAL INFORMATION:** Advice or opinions communicated to or by a Company attorney and any documents revealing the substance of legal advice, etc.

* Also see "RECORDS" (Personal Files/Personal Data)

DRESS CODE

Appropriate attire for employees of this company shall be in accordance with the area and/or department you work in.

In general, Clow Stamping Company wishes to present a professional atmosphere when interacting with customers, other employees, visitors and vendors.

All employees are expected to dress and groom themselves in accordance with accepted social and business standards, particularly if their job involves dealing with customers, visitors, or vendors in person.

Individual Department Supervisors/Managers may specify further dress code provisions as they deem necessary for their departments. If at any time a department Supervisor/Manager or the President feels an employees attire is out of place, that employee may be asked to leave the workplace until he/she is properly attired. An employee thus instructed will not be paid for the time off required for this purpose and will be expected to return promptly to the workplace.

When working at a customer's site, employees may dress appropriate to that site, but in all cases their clothing must be neat and clean and appropriately conservative.

* All attire must meet Company Safety Guidelines. (Reference the Clow Stamping Safety Book)

Listed below are general guidelines to help you determine what may or may not be appropriate.

Acceptable employee attire:

Garments should cover the body. For safety reasons, avoid unnecessary exposure. Briefs, halters, sheer garments, etc. are not acceptable.

Suggestive patches should not be worn on blouses, shirts or pants. Example: obscenity, nudity or other offensive or suggestive designs.

Garments should be loose enough to be comfortable.

Skirt lengths should be safe and long enough to avoid inappropriate exposure.

Acceptable office attire guidelines:

Full length jeans that are neat (without holes, tears or excessive fading), full length slacks or khakis, Capri pants, skirts or dresses that fall to just above the knee or lower, shirts with collars, sport shirts, blouses, turtlenecks, sweaters and appropriate sweatshirts (not workout attire, sweat pants or shorts).

DRUG AND SUBSTANCE ABUSE POLICY

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager computers and training computers throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

Policy Statement

Clow Stamping Company believes the use of illegal drugs and misuse of legal drugs, including alcohol, is a source of danger in the workplace and a threat to the goal of Clow Stamping in maintaining a productive and safe work environment. Accordingly, the Company discourages users of illegal drugs and misuse of legal drugs, including alcohol, from seeking employment with Clow Stamping Company and encourages the rehabilitation of such persons already in its employ.

Under Company policy, the possession, distribution, sale or use of illegal drugs or controlled substances by employees is prohibited. Further, possession, distribution, sale or use of, or being impaired or under the influence of, alcohol or any unauthorized drug on Company premises, while on duty on the premises of employers and customers of Clow Stamping, or while operating machinery, equipment, or vehicles of Clow Stamping Company or customers of Clow Stamping Company is prohibited. Violation of the policy will result in a mandatory chemical dependency assessment and may result in mandatory counseling and rehabilitation programs or termination of employment.

Policy Implementation:

The Personnel Manager is authorized to implement this policy and program on behalf of Clow Stamping Company. Clow Stamping reserves the right to change, modify or alter any of the terms and conditions set forth in this Drug and Substance Abuse Policy at any time, for any reason, without advance notice to current or future employees of Clow Stamping Company so long as such changes are consistent with and not in conflict with any state or federal statute or regulation pertaining to drug and substance abuse testing in the workplace.

Notice:

Written notification to applicants for employment will be provided as an attachment to the employment application form.

Education and Training:

Educational information is available through the Personnel Manager or Risk Manager regarding the potentially dangerous effects of drug and alcohol use and abuse.

Supervisors will receive basic training on identification of behavioral and physiological signs of drug and alcohol abuse, how to recognize, counsel and document employees whose performance has deteriorated, and how and when to suggest and/or require the services of the Employee Assistance Program (EAP).

REASONABLE SUSPICION DRUG TESTING

Reasonable suspicion includes, but is not limited to:

1. An employee who is under the influence of drugs or alcohol.
2. An employee who has violated Clow Stamping Company work rules prohibiting the use, possession, sale or transfer of drugs or alcohol while the employee is working or while the employee is on the employer's premises or the employee is working on the premises of customers of Clow Stamping Company or the employee is operating Clow Stamping Company vehicles, machinery or equipment of customers of Clow Stamping.
3. An employee has sustained a personal injury or has caused another employee to sustain a personal injury that required time loss beyond the day of the injury.
4. The employee has caused a work-related accident or was operating or helping to operate machinery, equipment or vehicles involved in a work-related accident.

Reasonable Suspicion Testing Procedure for Employees:

1. The reasons for the suspicion and the facts or circumstances of any incident precipitating "reasonable suspicion", testing will be documented by the Personnel Manager or Risk Manager.
2. Employees involved in work related accidents may be required to take a drug screening test as soon as possible after the occurrence of the accident.
3. Employees who are required to take a drug screening test due to suspected unauthorized drug or alcohol use detected through reasonable suspicion will be subject to the following Company actions:
 - A. Any employee refusing to sign a release for substance abuse testing will be considered "insubordinate" and will be subject to discharge.

- B. When there is reasonable suspicion to require an employee to take a drug screen, Clow Stamping Company will transport the employee to the hospital/clinic at the company's expense. A supervisor or designated management representative will accompany the employee. The supervisor or designated management representative is then responsible for making arrangements for the employee's transportation home.
- C. Any employee required to take a drug screen will be suspended with pay for the remainder of his work shift on the day of the testing. The employee will not be allowed to return to work for his next work shift pending the outcome of the drug screen. An employee will receive a paid suspension if the results are negative and an unpaid suspension if the results are positive.
- D. A confidential conference with the employee and the Personnel Manager or Risk Manager will take place concerning the results of the drug screen. At the employee's request, a physician will be available for interpretation and explanation of the test results.

Employees whose test results are negative, indicating that drug use was not responsible for the inability to satisfactorily perform their job duties or their inappropriate behavior, are required to meet with the Personnel Manager to address the performance and behavior issues that led to the fitness for duty evaluation.

Employees whose test results are positive will be given the opportunity to explain a positive test result on a confirmatory test or request a confirmatory retest at their own expense. If the original test result is unchanged, the employee is required to meet with, or make an appointment to meet with, a counselor in the Employee Assistance Program, within three days of a positive test, for recommendations and/or referral for further treatment. (Clow Stamping Company is responsible for the expense of this referral). The employee is required to sign an informational release so that the Personnel Manager or Risk Manager will have notification of the meeting. The employee may be required to enroll in a rehabilitation program as a condition of employment.

Clow Stamping Company will inform an employee who has undergone drug or alcohol testing of, a negative test result on an initial screening test or of a negative or positive test result on a confirmatory test. Clow Stamping Company will further explain their right to request and receive a copy of the test result report on any drug or alcohol test and the right to an explanation of the test result.

- E. Employees who have had a positive test, been evaluated, gone through rehabilitation, and returned to work, will be subject to mandatory unannounced follow-up testing for the next twenty-four (24) months.
- F. Employees will be terminated if a second positive test result is found in an employee who previously had a positive test result at any time while employed by Clow Stamping Company.

Clow Stamping Company will not discharge, discipline, discriminate against, request or require rehabilitation of an employee of Clow Stamping on the basis of a positive test result from an initial screening test that has not been verified by a confirmatory test.

Clow Stamping will not discharge an employee for whom a positive test result on a confirmatory test was the first such result for the employee on a drug or alcohol test requested by the employer unless the following conditions have been met:

1. The employee has been given an opportunity to participate in, at the employee's own expense or pursuant to coverage under an employee benefit plan, either a drug or alcohol counseling or rehabilitation program, whichever is more appropriate, as determined by Clow Stamping Company after consultation with a certified chemical use counselor or a physician trained in the diagnosis and treatment of chemical dependency.
2. The employee has either refused to participate in the counseling or rehabilitation program or has failed to successfully complete the program, as evidenced by withdrawal from the program before its completion or by a positive test result on a confirmatory test after completion of the program.
3. Notwithstanding the foregoing, Clow Stamping Company reserves the right to temporarily suspend the tested employee, pending the outcome of the confirmatory test and, if requested, the confirmatory retest. An employee who has been suspended without pay will be reinstated with back pay if the outcome of the confirmatory test or requested confirmatory retest is negative.
4. Clow Stamping Company will not discharge, discipline, discriminate against or request or require rehabilitation of an employee on the basis of medical history information revealed to Clow Stamping unless the employee was under an affirmative duty to provide the information before, upon or after hire.
5. All employees of Clow Stamping Company will be given access to information in the employee's personnel file relating to positive test results and other information acquired in the drug and alcohol testing process and conclusions drawn from the actions taken based on the reports or other acquired information.

Rehabilitation for Employees:

The opportunity for rehabilitation may be provided to an employee who has a substance abuse problem, through the following:

1. The Employee Assistance Program (EAP) is an independent third-party organization providing trained counselors who assist employees with personal problems such as substance abuse. These counselors assess an employee's problems and refer

them to additional sources of assistance. They may also serve an independent third party in reporting on an employee's progress throughout the rehabilitation program.

2. The employee's health insurance plan:

An employee eligible for rehabilitation in lieu of discharge must provide documentation from a physician, licensed clinical social worker or licensed clinical psychologist that they have enrolled in or taken the necessary steps to enroll in a state licensed rehabilitation within three (3) days of their being notified of positive test results on a confirmatory test or confirmatory retest if one is requested.

If a referral to an EAP is made mandatory as a condition of employment, and an employee refuses to cooperate or satisfactorily meet the requirements of the EAP by enrolling in an appropriate rehabilitation intervention program, the employee will be subject to discharge for violation of the substance abuse policy and for insubordination.

As a condition of employment, all mandatory referrals to the EAP must sign a release of information allowing:

1. The EAP or treatment provider to provide periodic progress reports to Clow Stamping Company.
2. Release of information by a significant other for corroborating data.

It will be considered a mandatory referral when an employee reports to Company management that he/she has a substance abuse problem and agrees to participate in an EAP and enroll in a rehabilitation program, if necessary.

An employee enrolled in a rehabilitation program on an outpatient basis will be expected to continue to perform the duties of their current position unless otherwise noted by the treating physician. Any restrictions and/or medications must be documented by the physician in writing and a decision will be made by management as to whether appropriate accommodation can be made, or whether the employee will be required to apply for a medical leave of absence. Employees enrolled in a rehabilitation program on an inpatient basis must apply for a medical leave of absence (see Medical Leave of Absence policy).

In order to return to work the following is necessary:

1. An employee must take another urinalysis test with a negative test result. The test must be taken at a designated urinalysis-testing center approved by Clow Stamping Company. The employee may retake the urinalysis test at any time after the original conference with the supervisor, but the test must be retaken within a thirty (30) day time period from the date the employee learned of the first positive test result. If the second test result is positive, the employee may be terminated.

2. An employee must provide written documentation from the provider that he/she has completed a rehabilitation program and in the case of an employee returning from a related medical leave of absence, he/she must provide a physician's statement releasing them to return to work.

An employee shall be subject to "no notice" testing for 24 months after completing a rehabilitation program. As a condition of continued employment, the employee must sign a memorandum of agreement acknowledging said testing. If a second positive test result is found, the employee will be terminated.

PRE-EMPLOYMENT DRUG SCREENING

Clow Stamping Company requires job applicants who are extended a "contingent" job offer, to pass a urinalysis, drug-screening test, before beginning employment. Failure to sign a release for testing procedure and/or failure to pass the examination are grounds for denial of employment with Clow Stamping Company. Chain of custody will be observed for direct specimen collection, transportation to a laboratory facility and arbitrary analysis.

All hiring advertising will include the statement "Clow Stamping Company requires drug and substance abuse screening as a condition of employment." All applicants will be given written notice of the drug and substance abuse policy. This will be provided as an attachment to the employment application. In addition, applicants will be given the opportunity to read the policy and accompanying procedures in their entirety. This will be provided to the applicant on the initial visit and retrieved after it has been read.

Any offer of employment is "contingent" upon a negative result on the drug-screening test.

All applicants who have been extended offers of employment and are scheduled for drug testing, must sign a form acknowledging that they have read and understand the drug testing policy and they are aware of the consequences.

The Personnel Manager, or Personnel Department, is responsible for scheduling an appointment for the applicant/employee for a urine specimen collection at a company-designated clinic/hospital. If a pre-employment physical is required, the specimen collection will be scheduled in conjunction with the physical examination if one is scheduled. Only company designated clinics/hospitals may be used for specimen collection.

All clinics designated as specimen collection sites for drug testing will comply with strict chain of custody procedures in forwarding specimens to the laboratory for analysis. An NIDA certified laboratory will be used with a 24-hour courier service provided from all collection sites.

Clow Stamping Company will request or require a job applicant to undergo drug and alcohol testing providing a job offer has been made to the applicant. The same test is required of all job applicants conditionally offered employment for a position with Clow Stamping Company. If the job offer is withdrawn, Clow Stamping Company will inform the job applicant of the reason for its action.

Clow Stamping Company may request or require an employee to undergo drug and alcohol testing as part of a routine physical examination. Clow Stamping will not request or require an employee to undergo drug and alcohol testing more than once annually after the employee has been given at least two weeks written notice that a drug or alcohol test may be requested or required as part of the physical examination.

Clow Stamping Company will inform an employee or job applicant who has undergone drug or alcohol testing of a negative test result on an initial screening test or of a negative or positive test result on a confirmatory test, the right to request and receive from Clow Stamping Company a copy of the test result report on any drug or alcohol test and the right to explain the test result.

An employee or job applicant may request a confirmatory retest of the original sample at the employee or job applicant's own expense after notice of a positive test result on a confirmatory test.

Within five (5) working days after notice of the confirmed result, the job applicant shall notify the company in writing of his/her intention to obtain a confirmatory retest. Within three (3) working days after receipt of the notice the company shall notify the original testing laboratory that the job applicant has requested the lab to conduct the confirmatory retest or transfer the sample to another laboratory licensed to conduct a confirmatory retest.

LIMITATION ON WITHDRAWAL OF THE JOB OFFER

If a job applicant has received a job offer made contingent upon the applicant passing drug and/or alcohol testing, Clow Stamping will not withdraw the offer based on a positive test result from an initial screening test that has not been verified by a confirmatory test. Applicants may request a copy of the test result report. Results of all reports will be held in confidence.

Applicants for employment with Clow Stamping Company may only begin working after the Personnel Manager or Risk Manager has received verbal confirmation of a negative result on a test. Under no circumstances will applicants be allowed to start work prior to the receipt of a negative test result.

Applicants who fail the drug test may reapply for employment with Clow Stamping Company after a period of six (6) months.

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Effects on Compensation and Benefits

An employee may be eligible for medical benefits under his/her health insurance plan for rehabilitation purposes; however, other additional costs or those costs not covered by the employee health insurance policy will be the responsibility of the employee.

All Company insurance continuation plans regarding leave of absence and termination of employment will apply.

Miscellaneous Provisions:

Drug screening under this policy will be carried out with all due concern for security, personal privacy and test accuracy by agents designated by the Company.

Results of all test, counseling, and rehabilitation will be held in confidence. Furthermore, Clow Stamping will not disclose the results of drug tests to other employers or other laboratories without the written consent of the individual.

Please note the following list used by St. Joseph's Medical Center when doing Chemical Dependency Evaluation:

St. Joseph's Medical Center
PERSONALIZED EVALUATION CHART

EARLY STAGES
(Not considered dependant)

Sneaks drinks/drugs
Preoccupied with alcohol/drugs
Gulps drinks/drugs
Avoids reference to alcohol/drug use
Has memory blackouts
Has increased alcohol/drug tolerances
Drinks/uses before and after social occasions
Begins relief drinking/using
Is uncomfortable in situations without drugs/alcohol

MIDDLE STAGE
(Considered Dependant)

Experiences loss of control
Is dishonest about alcohol/drug use
Has increased frequency of relief drinking/using
Hides and protects supply
Experiences urgent need for first drink/drug
Tries periods of forced abstinence
Others disapprove of drinking/drug use
Rationalizes drinking/drug usage
Experiences flashes of aggressiveness
Exhibits grandiose behavior

Has guilt about drinking/drug usage
Neglects eating
Builds unreasonable resentments
Devalues personal relationships
Considers geographic escapes
Sexual drive decreases
Quits or loses jobs
Exhibits unreasonable jealousy
Drinks/uses alone (secretly)
Tries to control drinking/drug usage

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LATE STAGE

Experience tremors and shakes
Experiences early morning
drinking/drug usage
Has persistent remorse
Lengthy drinking/drug binges occur
Thinking is impaired
Drinks/uses with inferiors
Loses tolerance for alcohol/drugs
Have indefinable fears
Unable to work

Physical health deteriorates
Moral standards deteriorate
Is admitted to hospital/sanitarium
Feels persistent remorse
Loses family and friends
Exhausts all alibis

EDUCATION BENEFITS

The technological pace of our times makes continuing education a matter of growing importance to the company and to the individual employee. Therefore Clow Stamping offers educational assistance in the areas of Company Required Training, a Tuition Reimbursement Program and an Apprenticeship Program. Additional job related education contributes to greater effectiveness on the job and is valuable in preparing for advancement. To encourage employee growth and development within the company, Clow Stamping provides partial or full reimbursement of tuition costs of required or requested and approved training courses.

COMPANY REQUIRED TRAINING

The Company or your immediate supervisor may require you to attend job-related courses or training programs. If you agree to attend, Clow Stamping Company will pay the full amount for the cost of books, materials, and credit costs. Mileage may also be paid at the decision of the company. You must maintain a "C" average to receive reimbursement pursuant to the policy.

TUITION REIMBURSEMENT PROGRAM

Employee Eligibility:

All full time employees are eligible after they have completed one year of continuous service. (Full time is 30 or more hours per week.)

Coursework Eligibility:

The course must be beneficial to both the Company and the employee in terms of increased knowledge, abilities and skills. Courses for personal enrichment do not qualify.

Examples of courses that are deemed of benefit to Clow Stamping Company may include:

1. Courses that relate directly to maintaining or improving an employee's ability to perform the job of their current position.
2. Courses that may be applied to a specific career development plan and/or to a specific position to which an employee may reasonably be promoted.
3. Continuing education courses directly related to an employee's current trade, professional license or certification.
4. Courses mandated by law or regulation in order for the employee to retain their position.

School Eligibility:

A course or program may be taken at any of the following types of schools:

1. An accredited educational institution, such as a High School, College or University.
2. A reputable correspondence school, in the event that;
 - a) An employee cannot attend regular classes for reasons of his or her work or travel schedule, or
 - b) A comparable course is not offered at a regular school within a reasonable commuting distance.
3. A reputable trade or technical school that offers specialized training or educational courses.

Work Schedule limitations:

1. A course taken under the tuition reimbursement program may not be attended during the employee's normal scheduled working hours, unless the course is only offered during scheduled working hours, and then, only if it does not interfere with the employee's ability to perform their job. Employees and their supervisors must arrange for make-up time so that employees work their scheduled work week. No legal or contractual obligations for overtime can be incurred while employees are enrolled in the Tuition Reimbursement Program.
2. Employees should not take on a course load that will cause job performance to suffer.

Approvals and other Considerations:

Prior to the commencement of any course(s), the employee must seek advanced authorization from his/her supervisor and from the Appointing Authority. Members of the Appointing Authority will consist of the Personnel Manager and varying support staff as appropriate to each request. Final review and approval is with the President. Once approval has been granted, it may not be rescinded except in case of emergency.

Supervisory Approvals: If there hasn't been a clear understanding of the employee's career development plans and goals during the performance appraisal process, a discussion should be held at this time. Decisions regarding release time should be made at this meeting. Supervisory approval is required to show that eligibility has been met. Any employees who experience difficulty with a supervisor supporting what is perceived to be a legitimate development plan and tuition reimbursement request should contact the Appointing Authority for further review.

Procedure to Participate:

1. Submit a completed Tuition Reimbursement Program Approval form (available in the Human Resources dept.) to the Personnel Manager prior to enrolling in a course of study.
2. Upon receiving written confirmation of reimbursement approval, register for enrollment and complete classes.
3. Within 30 days of completion of the course, the following documents must be submitted to the Personnel Manager.
 - a) Copy of the course syllabus for each class.
 - b) Copy of the final grade for each class.
 - c) Submit all bills or copy of payment receipt for all covered charges.

Evidence of Completion: Employees must provide the Personnel Manager with evidence of satisfactory course completion. Such evidence may be an official grade card or transcript from the institution. If that is not possible, written confirmation of course completion from the instructor or institution will be accepted. Reimbursement /Payment of eligible expenses will then be authorized.

Tuition and Fee Provisions:

Reimbursable:

1. If the course(s) are taken and completed with a final grade of "C" or equivalent, or higher.
2. If the maximum tuition reimbursement rate for any course(s) of study does not exceed \$ 500.00 per calendar year.
3. If eligible employees are laid off, their hours are reduced, or they go on a disability leave of absence, any approved course(s) in progress will be reimbursed, provided the course is completed with a final grade of "C" or equivalent, or higher.
4. If receiving duplicate or comparable fees from another institution or agency, grant, scholarship, Veterans' Education Benefit, or other financial aid. The Clow Stamping Company program may supplement aid received from these other sources.

Not Reimbursable:

1. If the employee voluntarily terminates employment, or are terminated for cause, prior to course completion, or
2. If the employee has not received advance approval prior to class enrollment, or
3. For itemized fees such as; application/pre-admission registration, transcript, test preparation, admission testing, book cost, travel cost (i.e., transportation, housing, meal, etc.), parking, equipment/tool costs, tutoring, and other similar fees.

Note: Tuition refund payments may be taxable and subject to withholding. The determination will be made at the time of final payment based on current tax law. Withholding taxes include Social Security, Federal and State taxes as applicable.

APPRENTICESHIP PROGRAM

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Students will begin employment at a mutually agreed upon hourly rate of pay and work schedule to enable continued school attendance.

A student may not begin an internship at Clow Stamping until they complete the Safety Training and submit appropriate hiring/citizenship documentation.

There will not be a wage evaluation until the end of the apprenticeship program.

Holidays will be paid according to the Employment Status Type policy.

At the end of the apprenticeship program, Clow Stamping Company will make a decision regarding the offer of permanent employment.

If hired, seniority and benefit eligibility are based on the full time hire date. Compensation will be comparable to other wages in the department.

CLOW STAMPING COMPANY
TUITION REIMBURSEMENT PROGRAM APPROVAL

Employee Name _____ Employee Number _____

Social Security Number _____ Date Hired _____

Department _____ Position _____

Proposed Coursework (course title & number) _____

School _____ Proposed course is:
Start Date for Course _____ Job Related
Ending Date for Course _____ Career Related

No. of Credits _____ Fee/Instruction Cost _____

Purpose of Anticipated Benefit of Course(s): _____

Signature of Applicant _____ Date _____

I have reviewed the supporting documentation and recommend reimbursement.

Supervisor _____ Date _____

Appointing Authority _____ Date _____

President _____ Date _____

Percent of Reimbursement _____ Amount _____

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ELECTRONIC NOTIFICATION
(Summary Plan Descriptions, Annual Reports and Materials, Modification
Summaries and Medical and Health Notices)

ERISA requires that a Summary Plan Description be accurate and comprehensive. The purpose of the Summary Plan Description is to summarize the contents of a welfare benefit plan and to inform the participants of their rights and obligations under the plan.

Please be advised that the Summary Plan Descriptions, Annual Reports, Material Modification Summaries and Medical and Health Notifications, or any other required notifications can be found on line (www.clowstamping.com) internet: or can be accessed through the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager training computers throughout the plant. They also may be found on file in the Clow Stamping Company Human Resources Department.

EMPLOYEE ASSISTANCE PROGRAM

Clow Stamping Company's Employee Assistance Program is a confidential counseling and referral service provided for any employee who wishes help with a personal or work problem. Periodically, employees have a personal problem which is not easily resolved, and it affects job performance, personal health and personal development. Clow Stamping Company extends confidential counseling/referral to its employees for any personal problem including behavior, chemical dependency, emotional, family, financial, legal, etc. A counseling session will include discussing the problem, reviewing possible solutions, and/or making appointments with an outside referral agency. Confidentiality is maintained by keeping any employee assistance program files separate from the employee's personnel file.

An employee who wishes to meet with the employee assistance personnel on Company time, must ask permission from his/her supervisor. An employee may contact employee assistance personnel directly when not on Company time. If the employee requests assistance outside his working hours, the visit will remain confidential. (An employee may meet with one or more than one of the assistance personnel.)

If a supervisor suspects that an employee has a personal problem which is affecting job performance, the supervisor may ask that employee to seek help through the employee assistance program. If an employee refuses to seek help and poor job performance continues, the employee may be involuntarily terminated per the Clow Stamping Company policies. However, if the employee seeks help in dealing with the problem, the supervisor may allow a reasonable length of time, depending on the scope of the problem, for job performance to improve. If, after a period of time, the employee does not improve his job performance, it is in the best interest of the Company to terminate that employee.

Employee Assistance Personnel and their home telephone numbers are:

Twyla Flaws	218-765-3311	Cell 218-821-8255
Robin Loftis	218-829-4547	Cell 218-821-8256
Steve Allen	218-746-3500	Cell 218-838-1784

Your health and well being are important to Clow Stamping Company.

EMPLOYMENT TYPE

FULL TIME

Thirty (30) or more Clow Stamping paid hours per week will be classified as full time.

HALF TIME

Twenty or more hours and less than 30 Clow Stamping paid hours per week will be classified as half time.

LESS THAN HALF TIME

Less than 20 Clow Stamping paid hours per week is classified as less than half time.

All paid time benefits will be paid based on Employment Type. FULL TIME classification has full pay for benefits (Holiday, Vacation, etc.) HALF TIME classification has half pay for benefits (Holiday, Vacation, etc.) Less than half time classification does not receive paid benefits.

Clow paid hours paid will be reviewed quarterly by Payroll. If, during a quarter, an employee has a reduction in weekly hours paid, he will be placed on a watch list. If the reduction of hours continues into a second quarter, there will be a change in employment type.

If the Clow Stamping hours paid requires a change in the employment type, the type will be changed by the employee's supervisor at the beginning of the next quarter.

TEMP EMPLOYEE (WEEKEND OR FULL TIME)

No paid time benefits are provided for temp employees.

EYE WEAR PROGRAM (Safety)

Clow Stamping Company has adopted an eye wear program available to all Clow Stamping employees.

If a Clow Stamping Employee has purchased Safety Eye-Wear due to Company Policy, Clow Stamping Company will re-reimburse that employee up to \$50.00 every 18 months for the expense of their safety eyewear. If you do not use the \$50.00 in 18 months, it is not accumulative.

For further information see the Personnel Department or Risk Manager regarding this Program. There are several eyewear agencies that offer discount prescription pricing to Clow Stamping employees. Ask for further information.

HEARING PROTECTION PROGRAM (Safety)

Clow Stamping Company has a custom molded hearing protection program available to all Clow Stamping employees with more than 1 year of service.

If a Clow Stamping Employee purchases custom molded ear plugs from a Clow Stamping Company approved vendor, Clow Stamping Company will reimburse that employee up to \$100.00 every 3 years for the expense of their hearing protection. If you do not use the \$100.00 in 3 years, it does not accumulate.

Forms must be signed by the Risk Manager before they are submitted for reimbursement.

For further information see the Personnel Department or Risk Manager regarding this Program.

*Please refer to the Clow Stamping Company Safety and Health manual for additional information or requirements regarding safety hearing protection.

FUNERAL LEAVE

All Clow Stamping employees are entitled to paid funeral leave of up to three (3) days as needed for immediate family.

Benefits paid will be based on Employee Type of Full Time or Half Time (See "Employment Type" policy). If an employee works less than half time, the funeral leave will be granted "unpaid" without use of accumulated excused time.

(Deceased's name and relationship to employee must be provided.)

Immediate family is defined as the employee's:

- Mother or mother figure (total of one)
- Father or father figure (total of one)
- Sister
- Brother
- Husband
- Wife
- Grandparent (total of 4 grandparents for lifetime benefit)
- Father-in-law (total of one)
- Mother-in-law (total of one)
- Children
- Grandchildren

Effective 8/1/14, Clow Stamping will discontinue sympathy cards to employees or their family. As we continue to grow, it is increasingly difficult to ensure we receive timely notification of deaths. However, please know that our deepest sympathy is with all employees during times of loss.

Clow Stamping will continue to send flowers to the funeral services of husband, wife or children under 18 if the information is provided to Human Resources.

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GRAFFITI

Graffiti is costly to remove. It nearly always violates the Company harassment policy. Violators will be subject to discipline up to and including discharge.

GRIEVANCE PROCEDURE

It is the policy of Clow Stamping Company to:

- Give employees fair and equitable treatment
- Provide employees with an easily accessible procedure for expressing dissatisfaction
- Foster sound employee-supervisor relations through communication and ultimate reconciliation of work-related problems.

The employee grievance procedure described herein has been established as a primary means of meeting these policy objectives.

Department heads and supervisors are responsible for making certain that employees under their supervision have knowledge of and understand the Company's discipline/grievance procedure and that the employees feel free to make grievance procedures without action being taken against them solely because the employee pled a grievance that pertains to job security, wage progression opportunity or chance for job advancement.

Every reasonable effort should be made by supervisors and employees to resolve questions, problems and misunderstandings that have arisen. Accordingly, employees should first discuss complaints or questions with an immediate supervisor. Employees are urged to initiate those discussions at the time a complaint or question arises. Supervisors, in turn, should take positive and prompt action to answer employee questions and resolve complaints presented to them. Employees may also meet with the Personnel Manager or HR Generalist prior to initiating a grievance to receive guidance and assistance.

If a satisfactory resolution is not reached, the employee may request that the grievance be reviewed by the Personnel Manager. The Personnel Manager will conduct a preliminary investigation prior to resolution for a determination of the validity of the complaint. The Personnel Manager's decision will be presented to the employee and that employee's supervisor.

If a satisfactory resolution of the grievance is not reached, the employee may request that the grievance be processed for review. The request must be in writing and presented to the Personnel Manager (Twyla Flaws). The Company President (Reg Clow) will review the dispute and a final decision will be made.

HARASSMENT / VIOLENCE

It is the policy of Clow Stamping Company to maintain a working environment free from offensive or degrading remarks or conduct. Such behavior includes inappropriate remarks about the employee's race, color, creed, religion, national origin, sex, sexual orientation, marital status, disability, pregnancy status, age, status with regard to public assistance or membership or activity in a local commission dealing with discrimination. Offensive behavior prohibited by this policy includes requests to engage in illegal, immoral or unethical conduct. Also prohibited is harassing or offensive behavior by Clow Stamping Company customers, representatives or any business contact.

One specific kind of illegal behavior is sexual harassment. Sexual harassment, which can consist of a wide range of unwanted sexually directed behavior, is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting said individual.
3. Such conduct has the purpose or result of unreasonable interference with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Any person who feels he or she is being subjected to offensive behavior of any kind should feel free to make it clear to the offender that such behavior is offensive. If the situation continues, the behavior must be immediately reported to the employee's supervisor, Twyla Flaws, Robin Loftis, Steve Allen, Doug Buehl, or Reg Clow. It is not necessary for any employee who feels that he or she is the subject of offensive behavior to handle it himself or herself. If an employee feels harassed or offended by another employee, by a supervisory or management person, by a member of the board, by a customer/client or any other person who he or she encounters in the course of employment, whether the opposite sex or same sex, and does not feel able to deal with the problem directly, the employee should go directly to Twyla Flaws, Robin Loftis, Steve Allen, Doug Buehl or Reg Clow.

All allegations of offensive behavior will be investigated promptly, fairly and completely. The facts shall determine the response to each complaint. Each situation will be handled discreetly. In the event that the offensive behavior reoccurs, it should immediately be reported to any of the persons named in this policy. An employee should understand that this policy applies to each and every member and employee of Clow Stamping Company, including the Board of Directors, Shareholders, Officers, Owners and Management, and all full-time, part-time and temporary employees. No retaliation or intimidation directly towards anyone who makes a complaint will be tolerated. Additionally, this harassment policy includes acts of violence against employees or non-employees by any and all persons. If you have been subjected to

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any act of violence or any threatening behavior (verbal or physical), report it to any of the persons named in this policy.

WORKPLACE VIOLENCE

Clow Stamping Company prohibits employees from carrying, possessing or using firearms (including but not limited to pistols) or other weapons while on Company premises (but not parking lots), while operating Company machinery, equipment or vehicles for work-related purposes, or while engaged in Company business off premises. This policy applies to all employees, including employees who have a valid permit to carry a pistol.

Clow Stamping Company reserves the right to search and inspect property and persons while on Company premises, while operating Company machinery, equipment or vehicles for work-related purposes, or while engaged in Company business off premises.

Clow Stamping Company encourages employees who are aware of policy violations or who receive threats of violence while on Company premises, while operating Company machinery, equipment or vehicles for work-related purposes, or while engaged in Company business off premises to promptly report the violations or threats to their supervisor.

Violation of Clow Stamping Company's "Harassment and Violence Policy" will result in discipline up to and including immediate termination of employment.

HEALTH AND WELLNESS

FOUNDERS HEALTH CLUB

Clow Stamping Company sponsors a Fitness Program. Exercise equipment, classes and information are provided in the Health and Wellness Building located next door to Clow Stamping Company.

Membership fees are nominal.

Contact the Human Resources Department for additional information or for membership sign up.

HEALTH CLUB MEMBERSHIP

Clow Stamping Company encourages and promotes health and wellness for their employees and families.

Each year, Clow will review the health and wellness program. Decisions for benefits will be based on monies available, employee utilization and available programs. If there are program changes for the coming year, they will be posted each December.

The amount of the health club benefit is considered wages and is subject to FICA tax only. This amount will be included with the regular wages reported on your W-2 at year end and will be taxable income on your tax return.

If an employee chooses to utilize the health club benefit, reimbursement forms are available in the Human Resources Department.

HOLIDAYS

All active Full time or Half time Clow Stamping employees shall be eligible to receive holiday pay at straight time provided they worked the day immediately preceding and the day immediately following the holiday if scheduled to do so, or they received permission from their supervisor for a scheduled absence. Department Supervisors are required to mark absence slips accordingly.

If an employee is suspended and the suspension day occurs the day before or after a holiday, the employee will receive holiday pay, however, the holiday will not count as one of the suspension days.

If an employee is off work due to an "unpaid" waiting period for a work related injury or illness, the employee will be eligible for holiday pay.

If an employee is off work waiting for Company requested drug testing results, the employee is eligible for holiday pay if the results are negative.

Benefits paid will be based on Employment Type of Full Time or Half Time. (See Employment Type policy).

Company Recognized Paid Holidays

New Years Eve Day
New Years Day
Memorial Day
Independence Day
Labor Day
Thanksgiving Day
Christmas Eve Day
Christmas Day
Floating Holiday (determined by Clow Stamping)

One Paid Personal Day

The Personal Day can be a day of the employee's choice. The employee must work six months before being eligible for the paid personal day. It must be used during the calendar year earned, cannot be accumulated from one year to the next, and must be used in one full block of time.

If an employee is on a paid disability leave through supplemental insurance or a paid work-related absence through workers compensation, the employee will not receive Holiday pay from Clow Stamping when compensated by another insurance carrier.

INSURANCE

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

MEDICAL INSURANCE & Group Life & Short Term Disability

Clow Stamping Company is self-insured for group medical insurance. Each employee who regularly works thirty (30) or more hours per week is eligible. There is a thirty (30) day waiting period for eligibility of benefits.

Eligible employees may elect medical coverage for themselves, their spouse and children. Employee participation expenses will vary, depending on selection of coverage.

As part of your benefits, you receive \$30,000 of term life insurance (with accidental death and dismemberment) and short-term and long term disability income insurance at no cost to you.

Eligibility and Effective Date

You and your dependents are eligible for coverage if you regularly work thirty (30) or more hours per week for 30 consecutive days as a Clow Stamping Company employee.

If you are hired through a temporary employment agency, your hours of work will not apply toward the Clow Stamping Company medical benefit waiting period.

You may elect coverage to begin the first day of either of the next two months following your eligibility date.

If you are not at work on your effective date due to sickness or injury, coverage will be delayed until you return to full time work.

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If you decline coverage, or decline coverage during the yearly open enrollment period, you will not be eligible for coverage for the remainder of the plan year unless you experience a “change of status”. (See the Medical Summary Plan Document and ERISA notification for specific details.)

Status Change

Please remember to notify the Company if you change your family status in any way. This will avoid delays in your coverage and errors in payment. If you pay your medical premiums with pre-tax dollars, you cannot discontinue coverage unless you have a “qualifying event”. (See ERISA)

How to File a Claim

Refer to the Group Health Plan Medical Summary Plan Document and your insurance card for details as requirements may vary from year to year.

Payment of Claims

All claim payments will be made according to the terms listed in the Group Health Plan Medical Summary Plan Document. You will receive an explanation of benefits for all claims submitted.

***NOTE:** If an employee finds an error on their bill, Clow Stamping Company will pay the employee 50% of the error total up to a \$500.00 maximum per error.

LIFE INSURANCE

Clow Stamping Company offers eligible employees \$30,000 of **group life insurance** (at no cost). Employees who regularly work thirty (30) or more hours per week are eligible.

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

FREE EMPLOYEE COVERAGE

Employee: \$30,000 with AD&D (Accidental Death and Dismemberment)

- Additional Life Insurance coverage may be purchased by the employee for themselves, their spouse and their dependents. Premiums for additional coverage will be paid by the employee. (See Supplemental Insurance – Life Insurance)

MEDICAL INSURANCE CONTINUATION

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

Termination

Your insurance coverage terminates on the day in which your employment ceases. Coverage may be continued at your expense under COBRA (Federal Public Law 99-272, Title X).

Lay Off

If you are laid off (complete lay off or from full-time to part-time) your medical coverage terminates on the last day of employment. Coverage may be continued under COBRA (Federal Public Law 99-272, Title X).

Clow Stamping Company will pay your COBRA premium for the remainder of the month of your layoff, plus two additional months.

If you do not purchase COBRA; your insurance coverage will terminate and you must wait 30 days after you return to work full-time to become re-eligible for health insurance benefits.

Retirement

Your insurance coverage terminates on the day in which your employment ceases. Earned but not used vacation days will not extend your termination date. Coverage may be continued under COBRA (Federal Public Law 99-272, Title X).

Disability

If you are unable to work due to a disability, your medical coverage terminates on the last day of employment unless you qualify for benefits under the Family and Medical

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Leave Act (FMLA). Please refer to sections of this handbook pertaining to FMLA and Leave of Absence.

Clow Stamping Company will pay your COBRA premium for the remainder of the month of your disability, plus two additional months. Further coverage may be continued at your own expense through COBRA (Federal Public Law 99-272, Title X).

If you do not purchase COBRA; your insurance coverage will terminate and you must wait 30 days after you return to work full-time to become re-eligible for health insurance benefits.

Leave of Absence

If you are on an approved “personal” leave of absence, your insurance will terminate on the last day of employment prior to the start of your leave of absence. Further health insurance coverage may be continued at your own expense through COBRA(Federal Public Law 99-272, Title X).

If you do not elect insurance continuation through COBRA; your insurance coverage will terminate and you must wait 30 days after you return to work full-time to become eligible for medical insurance benefits.

(If your Leave of Absence plans change unexpectedly and you return to work before missing 40 work hours, your insurance coverage will not lapse.)

FAMILY AND MEDICAL LEAVE ACT

If you have a family and/or medical leave from active work certified by your physician, you are considered to be actively at work for purposes of eligibility and termination of coverage. Your health insurance coverage will remain in force as long as you continue to meet the requirements set forth by the Family Medical Leave Act and you continue to contribute the employee portion of the medical insurance premium. The maximum FMLA Leave is 12 weeks. Please notify Human Resources if you believe you qualify for FMLA.

Should you fail to return to work from your family medical leave, Clow Stamping Company will require the premium portion they paid in your absence be reimbursed to them.

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If your FMLA leave is for your own serious health condition, you may also qualify for the insurance extension listed under the Clow Stamping Company Disability Insurance Continuation Notice (COBRA).

While on FMLA leave, your election not to purchase the health insurance extension will be deemed a qualifying event under COBRA; your insurance coverage will terminate and you must wait 30 days after you return to work full-time to become re-eligible for health insurance benefits.

ERISA

Federal law requires the Employer to describe your “ERISA rights, which are some of your rights and possible actions under the Plan.

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

INSURANCE CONTINUATION NOTICE (COBRA)

Public Law 99-272, Title X

On April 7, 1986, a new Federal law was enacted (Public Law 99-272, Title X) requiring that most employers sponsoring group health plans offer employees and their families the opportunity for a temporary extension of health coverage (called “Continuation Coverage”) at group rates in certain instances where coverage under the plan would otherwise end)

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

- Additional Life Insurance coverage may be purchased by the employee for themselves, their spouse and their dependents. Premiums for additional coverage will be paid by the employee. (See Supplemental Insurance – Life Insurance)

SUPPLEMENTAL INSURANCE

EMPLOYEE SPONSORED SUPPLEMENTAL INSURANCE

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

Included below is a list of employee paid insurance offered by Clow Stamping Company. Employees who regularly work thirty (30) or more hours per week are eligible.

These policies are intended to supplement your Company sponsored and paid insurance program. All benefits will be paid directly to you or your designated beneficiary.

Dental Insurance

As an employee, you have the opportunity to purchase dental insurance coverage. The dental insurance is Company sponsored but not Company paid.

Participation is voluntary. Premiums for the program are deducted from your pay by automatic payroll deductions.

Dental insurance must be purchased through an application process. Contact the Human Resources Department for coverage and premium information.

- Dental Insurance must be applied for within 30 days from the date of hire. There is no yearly "open enrollment" period. If you do not place an application for coverage within the first 30 days of your employment, there will be penalties in the type and percentage of coverage. (Check UNUM site on line.)

Coverage usually becomes effective within 30 days after receipt and acceptance of your enrollment application by the supplemental insurance company.

AFLAC
Cancer Insurance

As an employee, you have the opportunity to purchase cancer insurance coverage. The Cancer Insurance is Company sponsored but not Company paid.

Participation is voluntary. Premiums for the program are deducted from your pay by automatic payroll deductions.

Cancer insurance must be purchased through an application process. Contact the Human Resource Department for coverage and premium information.

AFLAC
Intensive Care Insurance

As an employee, you have the opportunity to purchase Intensive Care Insurance. It is Company sponsored but not Company paid.

Participation is voluntary. Premiums for the program are deducted from your pay by automatic payroll deductions.

AFLAC insurance must be purchased through an application process. Contact the Human Resource Department for application information.

AFLAC
Hospitalization Insurance

As an employee, you have the opportunity to purchase Hospitalization Insurance . They are Company sponsored but not Company paid.

Participation is voluntary. Premiums for the program are deducted from your pay by automatic payroll deductions.

AFLAC insurance must be purchased through an application process. Contact the Human Resource Department for application information.

AFLAC
Accident Insurance

As an employee, you have the opportunity to purchase Accident Insurance . They are Company sponsored but not Company paid.

Participation is voluntary. Premiums for the program are deducted from your pay by automatic payroll deductions.

AFLAC insurance must be purchased through an application process. Contact the Human Resource Department for application information.

Additional Life Insurance

As an employee, you have the opportunity to purchase life insurance which is “additional” to the Company-paid employee life insurance policy. The Additional Life Insurance is Company sponsored but not Company paid and is available for you, your spouse and your dependents. Participation is voluntary. Premiums for the policy are deducted from your pay by automatic payroll deductions.

Additional life insurance must be purchased through an application process. Contact the Human Resource Department for application information.

Short Term Disability

As an employee, Clow Stamping Company provides you with Short Term Disability Insurance at no cost. The policy has a 14 day waiting period. You must apply for disability income benefits coverage on line or by telephone. Contact the Human Resources Department for further details.

Long Term Disability

As an employee, Clow Stamping Company provides you with Short Term and Long Term Disability Insurance at no cost.

COBRA CONTINUATION OF SUPPLEMENTAL INSURANCE

With the exception of dental insurance, all supplemental insurance extensions must be purchased directly from the insurance carrier.

Dental insurance may be continued through COBRA by making payments to the Clow Stamping Company Human Resources Department.

You will receive a COBRA insurance continuation letter from Clow Stamping Company's Human Resources Department outlining all of your insurance extension options.

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

JURY DUTY

Serving on a jury when called is a civic duty and helps ensure our basic liberties. While serving, your full salary will continue. Benefits paid will be based on Employment Type of Full Time or Half Time. (See Employment Type policy).

Hours spent away from the Company while serving on jury duty will not be considered when figuring overtime.

The Company expects that you will come to work on days when you are released from jury duty or are excused early. Please notify your supervisor when you receive notifications regarding jury duty. Monies received from the courts, if they are in addition to your regular salary, must be reimbursed to the Company. (This does not include mileage or day care reimbursement.)

- The Company will cooperate fully with local, state, and federal courts in allowing an employee to serve on juries.
- The laws on payment of jurors differ in each state. However, in general, the Company will pay employees what they would have earned had they not been serving on a jury, less what they are paid by the courts. (Maximum length of Company pay will be 90 work days.)
- In the event that the absence of an employee from work is over a long period of time (some trials go on for months) would cause a hardship on the Company, the Company may petition the jury selection committee to excuse the employee from jury duty. Also, the individual may personally petition to be excused from jury duty if doing so would cause a hardship on his or her family.

Jury Duty / Subpoena Leave

1. Leave of absence for jury duty will be granted to Clow Stamping employees.

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- An employee serving on jury duty will be paid regular straight time wages while serving. A copy of the official court check or other documentation of remuneration must be presented to the Payroll Department. An employee must reimburse Clow Stamping for any remuneration received from the court, other than mileage.
2. An employee on jury duty will be expected to work as much of his regularly scheduled shift as his jury duty schedule permits; to the extent that combined time on jury duty and work does not exceed eight hours on a given day.
 3. An employee who receives notice of jury duty must notify his or her supervisor as soon as possible in order that arrangements may be made to cover his position. If an employee holds a position essential to the operation of the Company, the supervisor will request the Human Resources Department to ask the Court to excuse that employee from serving.

LAY OFF PROCESS

Lay offs will be based on individual employee job performance, attendance and the needs of the Company.

Paid time off benefit hours (vacation or sick) will not be earned during your layoff.

LEAVE OF ABSENCE

Personal Leave

A leave of absence is a Company authorized absence from work without pay for a specified period of time and for special personal circumstance. The employee should request a leave of absence through his supervisor or the Personnel Department.

All employees who have worked thirty (30) consecutive days are eligible to request a personal leave of absence.

When requesting a leave of absence, the employee must list the reason for the request and a return to work date. This request must be signed by the employee. If the request is accepted, it will be signed by the Personnel Department and/or the employee's supervisor.

If an employee is requesting a leave of absence to go to work for another employer, or to go to school for a non-work related study, the employee must have worked a minimum of one year for Clow Stamping Company before the leave of absence can be considered.

The maximum length of time for a personal leave of absence is 90 days. If the original leave of absence request is for more than 30 days, and leave is granted, the leave will be re-evaluated at 30, 60, and 90 days. Management may choose at any one of the evaluations to discontinue the leave of absence.

When an employee requests a leave of absence and states a return to work date, failure to report for work on the return date terminates employment.

Disability Leave

If you are unable to work full time or must work part time due to a disability, you may qualify for a disability leave of absence. You may also be eligible for the Company sponsored Short Term and Long Term Disability.

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

Funeral Leave

See Funeral Leave Policy.

Family Medical Leave

FMLA is an unpaid mandate requiring employers with 50 or more employees to provide up to 12 weeks a year of unpaid leave to certain workers.

To qualify for FMLA you must have been employed at Clow for at least 12 months (not necessarily consecutive) and worked at least 1,250 hours within the last twelve months. Leave may be taken for one or more of the following reasons in accordance with applicable law:

- To care for a new child, whether for the birth of a son or daughter, or for the adoption or placement of a child in foster care;
- To care for a seriously-ill family member (spouse, child or parent);
- To recover from an employee's own serious illness;
- To care for an injured service member in the family;
- To address qualifying exigencies arising out of a family member's deployment

The FMLA further requires employers to provide for eligible workers:

- Restoration to the same position upon return to work. If the same position is unavailable, the employer must provide the worker with a position that is substantially equal in pay, benefits and responsibility
- Protection of employee benefits while on leave. An employee is entitled to reinstatement of all benefits to which the employee was entitled before going on leave
- Protection of the employee to not have their rights under the Act interfered with or denied by an employer
- Protection of the employee from retaliation by an employer for exercising rights under the Act

A serious health condition typically requires in-patient care or continuing treatment by or under the supervision of a health care provider, as defined by applicable law. Family and medical leave generally is not intended to cover short term conditions in which treatment and recovery are very brief.

Depending upon the type of leave, intermittent or reduced schedule leave may be granted at the discretion of Clow Stamping Company or when medically necessary. However, part time employees are only eligible for a prorated portion of leave to be used on an intermittent or reduced schedule basis, based on their average hours worked per week. Where an intermittent or reduced leave is foreseeable based on planned medical treatment, Clow Stamping Company may transfer the employee temporarily to an available alternative position, which has equivalent pay and benefits.

If an employee requests a leave for the serious health condition of the employee or the employee's spouse, child or parent, the employee may be required to submit sufficient medical certification. In such a case, the employee must submit the medical certification within fifteen (15) days of the date of the request or as soon as practicable under the circumstances.

If there is reason to doubt the validity of a health care provider's certification, the Company may require a second opinion at Clow Stamping Company's expense. If the opinions of the first and second health care providers differ, a certification from a third provider may be required at Clow Stamping Company's expense. An employee may also be required to present a certification from a health care provider indicating the employee is able to return to work.

Employees must give 30 days written notice of a leave of absence where practicable. Employees are expected to make a reasonable effort to schedule leaves resulting from planned medical treatment so as not to unduly disrupt the operation of the Company, subject to the approval of the health care provider.

The provisions of this leave are intended to comply with the applicable law, including the Family and Medical Leave Act of 1993 ("FMLA") and applicable regulations. If this policy is ambiguous or contradicts applicable law, the language of the applicable law will prevail.

If you need to request Family Medical Leave, you must meet with the Human Resources Department to receive the appropriate paperwork and formally submit your request.

Military Leave

It is our policy to afford such reemployment rights as are required by laws of the United States. Military leaves of absence will be granted for permanent employees to coincide with all National Defense Programs in the following manner.

1. Employees who are training with a National Guard or Military Reserve unit will be granted unpaid leave of absence.
2. The employer will make every effort to reinstate employees returning from military leave to their former jobs or an equivalent position depending on the availability of such positions.

Parental Leave

29 CFR 825, 29 USC 2601 Family and Medical Leave Act, US Department of Labor, Wage and Hour Division (612) 370-3341

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State:

Minnesota Statutes 181.940 Minnesota Department of Labor and Industry, labor Standards, (651) 284-5005

If you are a member of the US armed services, you may have additional leave rights under the Federal Uniformed Services Employment and Reemployment Rights Act (USERRA) For more information, call the US Department of Labor at (612) 370-3341

- **Paid time off benefit hours (vacation or sick) will not be earned from the day you are unable to work due to any leave of absence.**

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LOANS

It is against Company policy to loan money to an employee.

LOCKERS

1. Coordination of employee locker facilities is the responsibility of the Production Manager and he will assign or distribute lockers required and/or available to employees.
2. Employees are expected to use only lockers assigned to them and provide their own locks if needed.
3. Lockers are considered Company property and may be inspected at any time.
4. Any suspicious activity around lockers should be reported to your supervisor, as should any break-in or theft.
5. The Company is not responsible for anything destroyed, lost or stolen from the lockers.

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MAIL

It is convenient, and acceptable, to use the Clow Stamping Company mail basket for personal outgoing mail. All personal mail dropped in the basket must have the required postage.

OVERTIME

The Department of Labor and Industry has stringent criteria regarding wages and overtime. Classification is based on exempt and nonexempt employees.

Clow Stamping Company has determined who their exempt employees are through the use of each employee's job description. Your Supervisor or the Personnel Manager can inform you of your status.

Exempt employees are not eligible for overtime pay.

Overtime for non-exempt employees becomes necessary when customer demand exceeds the current capacity. Overtime is considered a short term fix and should be replaced in the long term by expansion and hiring. Clow desires to maintain a consistent work force that works 40-45 hours per week.

Since Clow Stamping Company is not able to predict precise future customer needs, it is difficult to react quickly enough to customer needs by hiring and expansion alone.

Overtime will be scheduled as needed. Advance notice will be given as soon as possible. Overtime will not be paid unless it is authorized by your Supervisor.

If an employee receives compensation for unauthorized overtime or double-time, it will be corrected on the following paycheck.

Mandatory overtime will be reviewed as part of your attendance record. See "Attendance policy" for complete details.

A time edit (or the Vantage system) must be used, approved by your supervisor, and given to payroll for both regular and overtime hours.

Any week that your authorized work hours exceed 40 hours, you will be paid any hours over 40 at the appropriate overtime rate. You may not work more than forty (40) hours in any given week so that you can work fewer hours in an upcoming week.

Calculating Overtime & Double-time

Overtime – When calculating overtime, all work hours and all benefit hours over 40 hours (except Jury Duty) will count towards over-time and will be figured at time-and-one-half of your regular hourly wage.

Double-time – When calculating double-time, all work hours and paid holiday hours over 52 hours will count towards double-time and be figured at two times your regular hourly rate.

PARKING

Clow Stamping Company provides and maintains parking facilities for employee use. Please park only in the designated areas or your assigned area. The Company assumes no responsibility for damage to vehicles or theft of articles from vehicles while on Company property. Employees are asked to use caution while driving on Company property and observe a 10 m.p.h. speed limit.

PAYROLL

Clow Stamping Company will not issue your paycheck to anyone other than you, unless you notify payroll or your supervisor in advance giving the name of the individual you have authorized to pick up your check for you. They are required to show identification before the check will be released.

Work Schedules/Pay Checks

The payroll work week starts at 10:00 PM on Sunday and ends 9:59 PM on Sunday. Schedules are subject to change at the Company's discretion and overtime may be required.

Employees are responsible for complete and accurate recording of time worked on time edits and the Vantage System and must notify their supervisor regarding any error on a paycheck.

Electronic Transfer/Direct Deposit

EFT (Electronic Funds Transfer) is available. See the Payroll Department for details.

Distribution

Payroll is issued bi-weekly.

Office: Friday

First Shift: Friday

Second Shift: Thursday

Third Shift: Thursday

No checks will be available before 2:00 PM on Thursday and all checks will be dated for Friday of the distribution week.

Advance Payment of Earned Wages and Salaries

If you are on vacation one week or more you may receive a vacation check in advance by prior notification to your supervisor or the Payroll Department.

Advance payment of earned wages or salaries may be made in an emergency or when an employee's regular pay day falls within his vacation period or leave of absence. Except in cases of emergency, requests for advance payment on wages or salaries must be made at least two weeks in advance. Requests for advance payment must be made to the department supervisors.

Cashing Pay Checks

Employees are expected to cash their pay checks on their personal time.

Pay Checks Lost

Employees are responsible for their pay checks after they have been issued. Checks lost or otherwise missing should be reported immediately to the Payroll Department so that a stop payment order may be initiated.

Unclaimed Pay Checks

Pay checks not claimed by employees within two weeks of the date issued must be returned to the Payroll Department.

Garnishments

By law the Company is required to honor legal garnishments of employee wages or salaries. Contact the Payroll Department if you have questions or concerns.

Payroll Deductions

By law the Company is required to deduct, where applicable, Federal Withholding Taxes, State Withholding Taxes, Social Security Taxes, Medical Taxes and garnishments from an employee's pay. In addition, deductions may be made when authorized by an employee for Company sponsored insurance programs, safety equipment and employee purchases.

Payroll Status Change

Payroll Status Change forms will be used for all payroll changes.

A payroll status (wage) change can be requested by a supervisor, but must be authorized by the Company President.

PLANT CLOSINGS

Snow Days/Catastrophic Plant Closings

Employees are requested to listen to radio station **107.5 FM/1340 AM KLZ or 106.7 FM WJJY** where announcements of plant closings due to stormy conditions will be made. If the plant opens and is forced to close early because of the weather, all employees who reported for work will be paid, and employees who did not come to work will not be paid. If the plant is closed before the start of the shift, employees will not be paid. All employees are urged to make every possible effort to get to work.

Payroll Policy

In the event there is not work for an actively at work employee due to a loss of electrical power or any other unforeseen circumstance beyond the normal control of the company management:

- (A) The actively at work employee will be paid for four (4) hours for zero to four hours of active work; and for eight (8) hours for four hours one minute to eight hours of active work.
- (B) If the employee is not actively at work (on vacation, sick, attending outside training, etc.), the employee will be eligible for whatever compensation the employee will normally receive. Such employee is not eligible for any down-time pay.
- (C) Any hours which an employee is paid for down-time will not be considered any portion of the 40 hours required before overtime is paid.
- (D) Any hours which an employee loses due to down-time may be made up during the same payroll period as the down-time providing that such makeup work is available. This decision shall be the responsibility of each supervisor.

Definitions

“Actively at work” means that an employee actually reported for work.

“Down-time” means that any or all of a Clow Stamping Company facility is not able to carry on with production due to a sudden, unforeseen event.

POWER OUTAGE PROCEDURE

In case of a power outage, please ensure employee safety and call the following people as soon as possible. If they do not answer, please leave them a message. They are the team who will work on power recovery.

Darin Owen	952 807 5216	Coordinate network and information service restoration – contact Lori D
Steve Allen	218 838 1784	Coordinate notification of plant department supervisors
Greg Fuhrman	320 630 6028	Coordinate power restoration and inform Steve and others on team
Twyla Flaws	218 821 8255	Contact radio stations and employees of plant closings / contact Reg C
Doug Buehl	218 831 2737	Oversee safety concerns

- If you are unable to reach one of the people listed above, call their back-up.

PLANT CLOSING PROCEDURE

In case of a power outage, inclement weather or other unforeseen exposure, please use the following procedure.

ENSURE EMPLOYEE SAFETY – move employees to a safe area if appropriate. (See posted shelter maps)

The decision to close the plant will be determined by the following people. Please contact:

Steve Allen	218 838 1784	
Twyla Flaws	218 821 8255	
Greg Fuhrman	320 630 6028	
Lori Davies	218 839 4705	
Doug Buehl	218 831 2737	Oversee safety concerns

Generally, there will be at least a two hour wait period for power to be restored before sending employees home, unless it is determined immediately that power will be off long term.

The decision to close based on weather or other unforeseen events will be conveyed to employees when a decision has been made by management.

NOTE:

The night ring line (218 765 3388) will work to call out even if the power is off. However, it will not work for an incoming call. If you call anyone from the list above, please give them a cell phone number to use if they need to return your call.

PROBATION

Clow Stamping Company has a 90 day probation period regarding Company standards and policies.

The Company retains the right to release any employee who fails to meet those standards.

Clow Stamping Company is to be considered the primary place of employment for each employee. Employees are not prohibited from being employed part time or full time with another company (with the exception of a competitor of Clow Stamping Company). However, employment with another company must not interfere with job performance or attendance at Clow Stamping Company.

PROMOTIONS/TRANSFERS

Clow Stamping Company believes in promoting from within. When possible, current employees will be given first consideration for new positions and transfers. Production requirements and scheduling demands will be considered when posting determination is made.

Positions which are posted will be those considered to be promotions by management. Generally, they will be positions which require specific knowledge or task abilities.

If the position being filled reports directly to the President on the organizational chart, the position will likely be appointed. All other positions within the Company will be considered by management for posting. (The Company reserves the right to appoint any position upon Supervisory request and Presidential approval.)

Postings will be displayed in the "posting boards" located on the outside wall of the maintenance room, the "north" lunchroom and outside the office lunchroom. Each employee is responsible for checking the board on a weekly basis if interested in departmental transfer. Qualifications important to, but not inclusive of, the selection process are:

1. Experience and ability to perform the job to Company standards. This may require in-house testing and a thorough review of prior work record, performance and attitude.
2. Recommendations from past or present supervisors and/or lead persons.
3. Seniority may be a determining factor when selection must be made from two equally qualified employees.
4. A full time transfer to another department may be a wage increase or decrease, depending on the position requirements. The wage must be consistent with other wages in the department.

If you are a temporary full time or part time employee for another department, your wage may require an adjustment.

Promotions and transfers are subject to a 90 day trial period. The Company or the employee may determine if the promotion/transfer is not successful. Should this occur, the employee will be given the opportunity to go back to his previous department, position and wage. (If an immediate opening is not available, a similar position will be offered.)

Transfer by Employee Request

1. An employee may request a transfer, from an occupation or department, to another occupation or department. Such a request need not be in the nature of a promotion. Requests for transfer must first be made to an employee's supervisor who will refer the employee to the department manager to determine his suitability for transfer.
2. An employee's request for transfer will be considered, except in unusual circumstances, only after he has been employed for at least six months in a position.
3. An employee's request for transfer will be considered on the basis of his qualifications for another position, his best interests, and the best interest of the Company.

Transfer By Company Request

1. Intra-departmental transfers (within the same department) of employees for a short duration for Company convenience may be made at any time at the discretion of the Company providing the employee is informed of the need and expected duration of the transfer and it does not adversely affect the pay and benefits of the employee.
2. Inter-departmental transfers (from one department to another) of employees for the Company's convenience may be made, providing the employee is informed of the expected duration of the transfer and it does not adversely affect his pay and benefits.
3. Employees promoted or transferred from one section or department to another section or department shall not be considered as having broken their service in the computation of their length of employment for employee benefits.

Part-Time Transfer

Part time positions filled in the office or other areas by production workers may require a pay adjustment. There will be a performance review at 30 days and six months, but it will not include a pay review. If transferring from second or third shift to first shift, the wage compensation for shift work will be terminated.

If a full time position is filled by a current Company employee, (job transfer) pay will be commensurate with the wages of the department being transferred to.

PURCHASES

Job related items purchased through Clow Stamping Company (shoes from the shoe truck, tools, Company logo T-shirts, etc.) may be paid for through payroll deduction with a maximum of four pay periods of deductions. Sales tax, if applicable, will be added to the purchase, but not a delivery charge. There is a minimum deduction of \$10.00 per pay period.

Non job related items purchased through Clow Stamping Company must be requested through your supervisor and paid for by check or money order in one payment. You must pay tax and a delivery/handling charge of 10% up to a \$30.00 maximum. Employees should not receive the ordered item until payment has been completed and no items are to be removed from Clow Stamping property until payment is made.

* Employees with less than one year of service can payroll deduct a maximum of \$200.00 for job related items.

RECORDS

Clow Stamping Company maintains a personnel file on each employee. Such information is treated as confidential. In accord with the Minnesota review of personnel file statute, an employee, upon written request, may review his or her personnel file once every six months and once every year after leaving employment for as long as the file is maintained. Additional specific information about rights under the Minnesota Personnel File statute is contained in materials provided to new employees during orientation. You may request a copy from the Human Resources Department.

Employees are requested to promptly report changes in status such as:

Change of:

Name

Address

Telephone Number

Marital Status

Dependents (names of spouse and dependents)

Formal education, courses completed and other training or skills acquired

Selective Service status

Person(s) to notify in case of emergency

Physical or other limitations

W-4 Exemptions

Department managers and supervisors are responsible for forwarding the above information to the Human Resources Department or Payroll Department.

Personnel Data / Personal Data

Information regarding an employee's work related or payroll information will not be released without a written consent from the employee. This includes family members, friends, lending agencies, banks, mortgage offices, prospective employers, etc. This information will be kept in the employee's Personnel File.

Additionally, personal or confidential information (medical information, key assessments, work restrictions, drug testing results, etc.) will not be released without a written consent from the employee. This includes family members, friends, lending organizations, banks, mortgage office, prospective employers, etc. This information is kept on file in the Human Resources Department.

RULES

- **This list is not all-inclusive. Other rules and regulations may apply.**

In order to maintain a fair and productive working environment, the company has established ruled of conduct, which are consistent with the practices mature people expect from each other. They are based on consideration of the rights, privileges and responsibilities of all individuals and are designed to protect you and the company from careless or abusive conduct.

Accordingly, a violation of these regulations constitutes misconduct on the part of the employee and appropriate disciplinary action will be initiated. These rules are guidelines only and are not all inclusive.

Clow Stamping Company has a warning slip procedure. However, Clow Stamping Company reserves the right to discipline as determined appropriate by the magnitude of the offense and the number of prior offenses.

Clow Stamping Company reserves the right to change these policies at any time and to terminate the employment relationship with or without cause.

(See the Warning Notices section)

DO NOT:

- Steal from the Company or other employees.
- Drink alcoholic beverages on Company premises or Company property
- Clock or edit another employee's time or have your own time recorded by another employee.
- Report for work under the influence of alcohol or drugs.
- Falsify Company records.
- Carry or use weapons or firearms on Company premises/property.
- Misuse or damage Company property or the property of another employee.
- Smoke in unauthorized areas.
- Leave plant during working hours without clocking out (except lunch and break)
- Operate tools, machinery or equipment unless trained and authorized.
- Post or remove notices on the bulletin board without Company approval.
- Stop work before shift ends or take early wash-up.
- Create scrap or poor quality material due to carelessness.
- Stretch break time or otherwise waste time.
- Create or contribute to unsanitary conditions by poor housekeeping.
- Sleep in the plant during working hours.
- Threaten or intimidate other employees or supervisors.
- Fail to maintain production standards.
- Come to work late.

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- Eat at work station other than at authorized times.
- Use another employee's tools without permission.
- Distribute printed matter on Company premises without permission.
- Fight or attempt to provoke a fight on Company premises.
- Fail to follow specified job instructions.
- Remove Company records or release confidential information.
- Work in a manner that willfully hinders another employee from completing his duties.

ADDITIONALLY:

- Employees should conduct themselves in a manner that is safe to themselves and their fellow workers.
- Personal problems between employees should not be pursued at work.
- All employees should have the permission of their supervisor when leaving the plant or office area, other than for lunch or break. They must tell their Supervisor why they need to leave and how long they will be absent.
- If a supervisor leaves the work area for any extended period of time, they should tell their department manager.
- Contributions may not be solicited of employees unless it is approved by their immediate supervisor. Raffles, benefit sales, etc. for charitable organizations may be allowed if they do not interfere with the progress of work.
- Obey all safety rules.
- Report an injury or accident.
- Wear required safety equipment.

INVESTMENT PLAN

401K Savings and Investment Plan

Complete and detailed information can be found on the Clow Stamping Company internal posting sites located on Supervisor, Manager and the training computers throughout the plant or on the external posting site at www.clowstamping.com.

They may also be found on file in the Clow Stamping Company Human Resources Department.

Basic Eligibility and Information:

You will be eligible to participate when you have completed 6 months of continuous service as a Clow Stamping employee and are at least age 18.

You may enroll in the plan on the first day of a plan year quarter (January 1, April 1, July 1 or October 1), after your eligibility requirements are met.

When you become eligible, the plan administrator will mail your enrollment information.

Enrollment in the plan is optional.

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SCHOOL CONFERENCE

MN Statues 181.9412 states: All employees, regardless of the size of the company, can take up to 16 hours per calendar year of unpaid leave to attend the school, child care and other educational activities of their children. This leave is unpaid, but employees may use any accrued paid vacation time they have.

(Also See Parental Leave and FMLA Leave under "Leave of Absence")

**SHOE PROGRAM
(Effective 1/1/11)**

Clow Stamping Company has a shoe program available to all employees.

If an employee has purchased the safety shoes required by Company policy, Clow Stamping Company will reimburse the employee up to \$60.00 per calendar year for the purchase of safety shoes. (Steel toe with metatarsal guard)

Forms must be signed by the Risk Manager (Doug Buehl) before they are submitted for reimbursement.

Each eligible employee will have a "Shoe Reimbursement Account". The account is based on a January to December calendar year and monies will be put in the account January 1st each year.

An employee may accumulate the \$60.00 annual shoe monies for up to two consecutive years. No accumulation of shoe monies for any employee will exceed \$120.00.

You must attach a copy of your sales slip to the required reimbursement form to receive shoe money.

If an employee terminates employment, the employee will not receive unused monies from his/her shoe reimbursement account.

SMOKING POLICY

Smoking will not be permitted on Clow Stamping property with the exception of:

Personal Vehicle:

Smoking is permitted in your personal vehicle. All cigarette butts, matches, etc. must be disposed of inside your vehicle.

Smoke Shack:

Smoking is permitted in the designated smoke shacks. All cigarette butts, matches, etc. must be disposed of in the receptacles in the shacks.

Do not light up and smoke while walking to your vehicle or to the smoke shack. Do not smoke on company property unless in your vehicle or in the smoke shack. This policy includes E-cigarettes or similar devices.

Any violation of the smoking policy may warrant a warning slip and/or disciplinary action.

Please see that Clow Stamping Company grounds are kept clean and free of litter.

Chew or Chew Tobacco:

Likewise, chew or chew tobacco use is prohibited in the facility or in any of the outbuildings.

SOLICITATIONS

Unauthorized solicitation of employees on the premises is strictly prohibited. This prohibition applies both to employees on working time and to outsiders. Solicitations for gifts (resignations, retirements, illnesses, weddings, births, etc.) are considered authorized.

No distribution of circulars or other printed material is permitted on Company property without consent from the Company. Contact the Personnel Department for authorization.

SUGGESTION BOX

There is a suggestion box in each of the production lunchrooms.

It is the innovative ideas and clear thinking of our employees that help our Company grow and improve.

We would like to hear your suggestions.

All suggestions must be signed. If we need further clarification, we want to be able to contact you directly.

Suggestions will be kept confidential if they are of a personal or confidential nature.

We will post suggestions and the Company responses in the posting boards on a regular basis. Names and/or confidential data will be withheld to maintain confidentiality.

TERMINATION / RESIGNATION / REHIRE

In the event you should resign, a two-week notice is expected from nonexempt employees and thirty days from exempt employees.

Unused paid time benefits will not extend a termination date. You will be compensated for applicable unused paid time benefits in your final check when termination occurs.

Last day worked is defined as the last date for which an employee is paid wages for hours worked.

A termination date is defined as a last day worked for a "personal leave of absence". Disability leave and FMLA leave may extend a termination date.

Last day worked and termination date will be the same date for all employees who quit, resign or are terminated.

Unless otherwise requested, your final check will be mailed to you at the address given in your personnel file and paid benefit accrual will be paid out according to policy. (see vacation policy)

If an employee is unable to work, for any reason, for six consecutive months, their employment will be considered terminated.

Terminated employees will be asked to fill out an exit interview form. This form will help the Company track reasons for turnover and provide suggestions from terminated employees for improving Clow Stamping Company employment conditions etc.

An employee gone six months to one year, for any reason other than lay off, will lose 25% of his seniority upon return to work. An employee gone less than six months will not lose seniority.

An employee gone more than one year, for any reason other than lay off, will forfeit half of his seniority.

An employee gone two or more years will forfeit all seniority.

An employee who is on lay off for less than 24 months will not lose seniority. Returns after 24 months will forfeit all seniority.

THEFT

Employee theft is detrimental to the interests of Clow Stamping and the employees. Employee theft results in significant additional costs and expenses to Clow Stamping, thus reducing the profits to Clow Stamping Company's shareholders, which could negatively affect employee wages.

Clow Stamping treats employee theft as a serious matter. If Clow Stamping learns that any employee of the company has stolen from either a co-employee or from the Company, that employee will be subject to immediate termination.

TIME CARDS / TIME CLOCK

All non-exempt (hourly) employees are required to turn in a weekly time edit and/or clock in on the computer system.

Under no condition shall an employee clock in time for any other employee.

Employees will clock in no earlier than 10 minutes before their starting times, and no later than 10 minutes after their stopping times.

All time is paid in 15 minute increments.

Any employee whose normal duties do not require him to frequently leave the plant, will clock out and in upon leaving or returning to the plant during his work schedule, regardless of whether the absence is due to Company or private business.

PUNCHING “IN”

If your regular work hours are 6:00 AM to 2:00 PM – you must clock in by 6:02 to receive 8 hours of compensation.

If you clock in at 6:03, you will receive 7 hours and 45 minutes of compensation.

If you clock in at 6:15, you will receive 7 hours and 45 minutes of compensation.

If you clock in at 6:18, you will receive 7 hours and 30 minutes of compensation.

Employee time cards or clock in records must be signed by the department supervisor.

If a supervisor is not available for an authorization signature, the time must be turned in unsigned for processing. Payroll will process the time and obtain the supervisor's signature.

- Clocking in up to two minutes after your assigned “start” time may not affect your clock in hours, but may be considered “late” by your supervisor.

PUNCHING “OUT”

If your regular work hours are 6:00 AM to 2:00 PM – you must not clock out before your shift ends to receive 8 hours of compensation. If you clock out at 2:00, you will receive 8 hours of compensation. If you clock out at 1:59, you will receive 7 hours and 45 minutes of compensation.

TOOLS AND UNIFORMS

You may purchase tools and rent uniforms through payroll deduction. Please see your supervisor for further details.

Upon termination of employment:

- Any non-returned uniforms will be deducted from your final check. You will be charged the purchase price. Any monies due for tools will be deducted from your final paycheck.
- Clow Stamping Company will attempt to contact you at your last known phone number or address regarding tools or personal property left at Clow. If we are unable to reach you, or you do not respond to our request to remove your property, any personal property left at Clow Stamping Company will be disposed of after 90 days.

TRAVEL EXPENSES

If an employee travels for Company approved business (training), etc., they will be paid as follows:

Travel hours will count as hours of work.

Time taken for meals will not count as hours of work.

Meals will be reimbursed up to \$10.00 per meal for breakfast or lunch and up to \$20.00 for an evening meal. If time away exceeds 12 hours, you will be allowed two meals. You must turn in a receipt for meal re-imburement.

Hours for travel are considered like any other work hours for computing overtime, etc.

Re-imburement

It is Company policy to reimburse employees for pre-approved business expenses when expended while performing duties as employees. Auto expenses will be paid at the federal standard mileage rate. Other expenses will be paid at actual cost. Keep written record of mileage and receipts for all other expenses. Contact your supervisor, the Accounting Department or the Personnel Department for further details.

(See vehicle policy)

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UNEMPLOYMENT COMPENSATION

If you are laid off, you may qualify for unemployment compensation. You must contact your local unemployment office for details.

VACATION POLICY

All Full Time and Half Time Clow Stamping Company employees are eligible for vacation benefits. Vacation benefit hours will be based on employment type of Full Time or Half Time. (See Employment Type policy)

Employees will begin earning vacation hours at the start of employment with Clow Stamping Company. Vacation hours earned are available for use after six months of regular service and will appear on the check stub when available for use. Vacation hours will be paid at the employee's basic hourly rate of pay in effect at the time the vacation hours are taken.

Employees will earn vacation each pay period according to the following schedule:

<u>Length of Service</u>	<u>Full Time</u>	<u>Half Time</u>
6 months – 2 years	1.54 hours	0.77 hours
2 years	3.08 hours	1.54 hours
5 years	4.62 hours	2.31 hours
12 years	6.16 hours	3.08 hours
19 years	7.70 hours	3.85 hours

This is equivalent to approximately the following on an annual basis:

<u>Length of Service</u>	<u>Full Time</u>	<u>Half Time</u>
6 months – 2 years	40 hours	20 hours
2 years	80 hours	40 hours
5 years	120 hours	60 hours
12 years	160 hours	80 hours
19 years	200 hours	100 hours

Vacation shall be considered part of the regular work week in determining overtime pay. (see overtime policy)

The minimum vacation request for non-exempt employees is two hours (with one hour increments thereafter). Vacation requests must be made to your supervisor. Exempt employees may request eight (8) hour minimums by turning in a signed absence form to the Human Resource department. Exempt employees do not need approval from their supervisor.

Supervisors have access to vacation balance information in the computer system.

Vacation requests shall be determined as closely as practical by seniority. Thereafter, it is determined on a "first to request" basis. Available vacation hours that may be used in

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any week are determined by the work load in each department. If possible, vacation time should be requested twenty four hours in advance.

Vacation time will not be earned when you are unable to work due to disability, lay off, leave of absence, or work related injury.

An employee can request vacation pay "in advance" prior to a scheduled vacation. The minimum request will be 40 hours.

An employee may sell vacation hours back to the Company if there is a personal or family medical emergency. The Company president will determine "the emergency". The minimum vacation time that can be "sold back" is 8 hours.

Vacation Accrual

Effective September 30, 2013 and each September 30th thereafter, vacation hours in excess of 300 hours on that date will be paid out at 50% of value.

Vacation Paid When on Personal Leave of Absence

Vacation accrual of 20 or more hours will be paid out at the start of a personal leave of absence (at the next available payroll) unless an employee requests it to be held until they return to work or their employment terminates.

Vacation accrual of less than 20 hours will be paid out at the start of the personal leave of absence (at the next available payroll).

Vacation Paid When Terminating

Vacation accruals will be paid out upon termination.

Employees with less than six months of longevity will forfeit vacation hours earned if employment is terminated. Employees terminating employment with six months or more longevity will be compensated for vacation hours earned and accumulated at the employee's basic hourly rate of pay in effect at the time of termination. (Vacation hours accumulated are not available until the next pay date after six months of employment is completed, as shown on the pay stub.)

VEHICLES

No unauthorized riders in a Company owned or leased vehicle.

There will be no unauthorized drivers of a Company owned or leased vehicles.

Employees are required to have a valid driver's license.

Employees are required to observe all federal and state driving rules and regulations when operating either a Company vehicle or rental vehicle.

Clow Stamping Company will not pay for driving violations incurred while on Company travel, such as speeding or parking tickets.

Your primary responsibility when driving a motor vehicle for Clow Stamping Company is driving the vehicle safely.

It is well supported by accident statistics that using a cellular phone, either a hand-held or a hand-free model while operating a motor vehicle distracts a driver's attention from traffic conditions. Situational awareness is diminished. Drivers were found to have a slower reaction time and to miss road signs, other vehicles and traffic lights.

For that reason, the following rules apply to all persons while they are driving a company vehicle.

DO NOT use a hand-held cell phone. Use a hands free system only when absolutely necessary. All non essential or non emergency calls should be placed after the vehicle is safely parked.

DO NOT use a computer or electronic handheld device

DO NOT search for items in the vehicle such as CD's and coins

DO NOT eat

DO NOT read maps or other printed material

VISITOR POLICY

Check-In

All visitors of Clow Stamping Company must sign in at the reception area. If you are visiting a Clow Stamping Company employee, it must be during the employee's scheduled break time. Visits during work hours must be pre-approved by the employee's supervisor.

All visitors of Clow Stamping Company are required to have a Clow Stamping Company employee present at all times when on the production floor.

Contractors and vendors performing work duties or daily routines for the Company must provide their certificate of insurance and be given Clow safety instructions prior to beginning work and thereafter on an as-needed basis by a supervisor or the Risk Manager. Any person or persons on Company property without permission will be asked to leave.

Glasses

All visitors touring/working in the manufacturing facility are required to wear safety glasses. Non-prescription safety glasses with side shields are available at the plant. Prescription eyeglasses are acceptable for walk through/tour visitors unless touring in the laser area. Contractors and outside vendors must wear safety glasses with side shields.

Shoes

Visitors are not required to wear safety shoes.

Hearing Protection

Hearing protection needs to be offered to all visitors. It is not mandatory unless the visitor is in the plant for more than two hours.

- For additional safety information and requirements, please refer to the Clow Stamping Company Safety and Health Manual which can be found on the Clow Stamping Company intranet/internet sites and written copies can be found in the "small press room", on the maintenance wall and in the front office.

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W-2 FORM

W-2 forms will be sent at the end of each calendar year to show your gross pay and deductions for the year.

In addition to W-2 forms, employees will receive a yearly Total Compensation Summary. This statement reflects the value of your benefits and compensation.

Total compensation is much more than what you see in your paycheck. It reflects Clow Stamping Company's commitment to you and your family. We hope that you remain a part of the Clow Stamping Company team for many years to come.

WAGES / SALARIES

All wages and salaries are intended to compensate employee performance and experience.

Wage Reviews

All newly hired employees will receive a 30 day and a 6 month review.

All employees receive annual reviews on their anniversary date. The opportunity for wage increase is based on job performance and the maximums set yearly by the Company.

If an employee transfers within the Company, they are not considered a new employee. They are only new to that department. Upon date of transfer, the employee shall receive 30 day and 6 month reviews. The employee will continue to receive an annual review based on their seniority date.

Shift Premiums

Employees who are scheduled to work an evening or night shift, except for those in certain “non-rated” positions, will be paid shift premiums as outlined below:

If you start between the hours of 4:00 AM and 9:59 AM, you are working first shift.

- 2nd shift – a second shift employee will receive an hourly wage plus a shift premium. (shift starts between 10:00 AM to 3:59 PM)
- 3rd shift – a third shift employee will receive an hourly wage plus a shift premium. (shift starts between 4:00 PM to 3:59 AM)

Temporarily changing shift start or stop hours (less than 14 day duration) will not require a change in pay.

Longevity Pay

All employees are eligible for increment wage increases due to longevity at:

5 years
7 1/2 years
10 years
12 1/2 years

There must be department parity. Should an employee's increment raise create a discrepancy, it will be reviewed.

Supervisors

An employee who becomes a supervisor may receive a wage increase for assuming the extra duties.

An employee who becomes a back-up supervisor may receive a wage increase for assuming the extra duties.

Likewise, an employee who has a decrease in job duties may receive a wage decrease.

WARNING NOTICES

Clow Stamping Company has implemented a warning slip procedure. However, Clow Stamping Company reserves the right to discipline as determined appropriate by the magnitude of the offense and/or the number of prior offenses.

Violation of any Company work rule, safety rule or policy may warrant a warning slip or termination.

Clow Stamping Company reserves the right to change these policies at any time and to terminate the employment relationship with or without cause.

Classification of Misconduct

1. Minor offenses are those violations of the code of employee conduct which are unacceptable if repeated, but for which the employee will not be discharged for the first offense.
2. Serious offenses are those willful or deliberate violations of the code of employee conduct of such a nature that the first offense may indicate that continued employment of the employee may not be in keeping with the best interest of the Company.

Classification of Disciplinary Action

There are four basic classifications of disciplinary action. These forms of discipline can be utilized by Clow Stamping Company in any order and are based on a twelve month period of time. The twelve months are calculated from date of warning, not offense.

1. Verbal warning notice - Employee is counseled by the supervisor following a minor offense in an effort to eliminate possible misunderstandings and to explain what constitutes proper conduct. This is a “verbal” warning but is presented to the employee in writing for record keeping.
2. First written warning notice - Employee receives a written notice of discipline following intentional or repeated minor offenses. The purpose of a written reprimand is to make certain that the employee is fully aware of the misconduct he/she has committed and what is expected, thereby enabling the employee to avoid a recurrence of the incident. The employee may receive one day off without pay at the supervisor’s discretion unless the violation is for attendance. If the violation is for attendance, the warning slip procedure for “late attendance / tardiness/ excessive absences” will apply. (see Attendance Policy)

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3. Second written warning notice - Employee receives a written notice of discipline following serious misconduct or further repeated minor offenses; up to three days of disciplinary time off without pay may be given. The purpose of a second written warning is to make certain that the employee understands the seriousness of the misconduct and that further misconduct will most likely result in discharge.
5. Discharge - Employee is discharged as the result of a serious offense or the final step in the accumulation of minor offenses of the same nature.

WARNING NOTICES / LEAD PERSONS

If a lead person is negligent in performing the duties of the position (failing to inspect product to inspection plan before signing off on a job – etc.) the lead person will receive one verbal and (if another offense) one written notice. If a second written notice is necessitated, the lead person may receive time off without pay and will lose the lead position for six month and hourly compensation will be adjusted accordingly.

After a six month suspension, the employee may apply for a lead position opening.

(This lead persons notice applies only to lead persons duties. Infraction of any other company policy or rule, by a lead person, will be disciplined according to company policies.)

- Clow Stamping Company reserves the right, by their sole discretion, to apply this warning slip procedure on a case by case basis and to deviate from it whenever the situation, in the sole and exclusive opinion of the Company, requires it.

* TEMP EMPLOYEE WARNINGS (See page 14)

WORKERS COMPENSATION

Clow Stamping Company is self-insured for workers compensation. It is important that all employees work safely to avoid injury.

Any accident must be immediately reported to your supervisor. An accident report form must be filled out by your supervisor and an accident investigation must be performed by the Risk Manager.

Failure to report an injury will endanger your eligibility for benefits and may result in disciplinary action.

If you feel a work-related injury is serious enough to require you to take time away from work, you must see a physician for the injury or illness.

If you receive medical treatment for a work-related injury, be certain your attending physician knows that it is work related.

Any employee who is injured on the job and requires lost time beyond the day of the injury must receive a drug test. That test should be done as soon as possible after the accident. (Please refer to the Clow Stamping Company Drug and Substance Abuse Policy for detailed information).

If you see a physician for a work-related injury, you must have a signed release from your physician before you will be allowed to return to work. It must list your working restrictions, if there are any. If you have a release to work and fail to report to work, the Company will determine you are voluntarily terminating your employment.

You will be required to continue to work while under restriction, providing a job is available that will comply with those restrictions. If you have a question or concern about safety, please see your supervisor, a safety person or the Risk Manager.

Subject to certain statutory limits, workers compensation benefits are paid at approximately 2/3 of your income.

In compliance with Minnesota State law, there are no wage compensation benefits for the first three days of missed time. Compensation begins on day four. If you are out ten days, compensation is retroactive to day one.

Clow Stamping Company (although not required to do so) will pay your regular wage for up to 8 hours on a lost time injury.

Time spent for additional medical treatment may be considered part of the 8 hours of paid time.

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If you are later reimbursed for any part of the 8 hours through the workers compensation insurance system, you will be required to reimburse Clow for the 8 hours paid.

If you are unable to work due to your work related injury, vacation or sick time will not accrue.

If an employee is released to work for any portion of a day and becomes sick, he may request benefit pay if applicable. The total benefit paid cannot exceed the maximum hours for which he is released to work.

Example: If an employee is released to work 6 hours and is out sick for 8 hours, he will receive only six hours of benefit compensation.

If you are off work for an extended period of time due to a work-related injury, your medical and supplemental insurance benefits may be continued as follows:

Medical coverage - for claims other than your work-related injury while you are out of work on a work related injury:

Clow Stamping Company will pay your COBRA premium for the remainder of the month of your work related disability, plus two additional months. Further coverage may be continued at your own expense through COBRA continuation (Federal Public Law 99-272, Title X).

Employee sponsored supplemental insurance:

Further coverage may be continued through COBRA (Federal Public Law 99-272, Title X). See COBRA section.

Complete and detailed information can be found on the Clow Stamping Company internal (intranet) posting sites located on Supervisor/Manager and training computer throughout the plant or on the external (internet) posting site at www.clowstamping.com. They may also be found on file in the Clow Stamping Company Human Resources Department.

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