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## **WELCOME**

Welcome to Concept Packaging (CPG).

Please familiarize yourself with our Vision Statement, which is in this handbook. You are a “stakeholder” of our company and we will treat you as a customer. We will help you develop your full potential through empowerment and continuous improvement. You must “aggressively challenge the present in order to create your own future.”

The employee handbook outlines our policies and procedures. Your Manager, Supervisor, or Human Resources representative will answer any specific questions.

Through the efforts and contributions of each employee, we will become the *supplier of choice* for our customers. I am confident you will have a productive and mutually beneficial career with CPG.

Sincerely,

Dave Katt,  
President

## **CORPORATE HISTORY**

Southland Container began operation in Inman, S.C., in March 1983 with 12 employees and 20,000 square feet of manufacturing space. We now have over 300 employees and 750,000 square feet. Our manufacturing equipment has been continually upgraded and a fully equipped machine shop allows us to build new or improve existing equipment.

The first expansion outside our original marketing area came in April 1989 when we opened a full manufacturing facility in Lexington, Kentucky. We leased 52,000 square feet and in 1993 purchased a 65,000 square foot building on 6.6 acres. In January 2006, we moved into a 250,000 square foot building in Georgetown, KY, which consolidated five separate operations into one. From this location, we serve central Kentucky along with the major metropolitan markets of Louisville, Kentucky, and Cincinnati, Ohio.

The acquisition of *Flag City Container* in April of 1991 led to the opening of Corwood Container in Findlay, Ohio. Along with the Findley plant, an assembly plant was opened in Willard, Ohio. We have since closed the facility and serve the Ohio market from our Georgetown plant.

*Sutlive Packaging* was acquired in August 1992 and renamed *Southland Specialty Packaging*. The facility was located in Norcross, Georgia and did sub-assemblies and specialty products along with warehousing finished goods. The plant was moved to Conyers, GA in 2000. In 2005 we closed Conyers and moved to Buford, GA where we continue to serve our customer base. In 2010 we began manufacturing specialty pallets and crates. We serve both the SC & GA markets for these products.

The decision was made in 1993 to change the name of the company to Concept Packaging Group. This gave all companies the same name and more accurately described the focus of our business. We have evolved from primarily corrugated to a total packaging company.

Continued growth occurred in May of 1996 when *Comtec Packaging* was acquired. The facility located in Raleigh, North Carolina positioned Concept Packaging to further penetrate the market inside the research triangle. We sold the facility in 2004 and serve our remaining customer base from the Inman plant.

*March Specialty Packaging* was acquired in May 1997 and was renamed Marsh-Concept. The facility was located in Chattanooga, Tennessee and continued the company's strategy of development along the I-75 and I-85 manufacturing corridors. The acquisition of Marsh also provided entry into a new market for Concept - finishing supplies and equipment. We sold the facility in 2002.

In addition to corrugated, the specialty products division of our business has grown rapidly at all facilities. We also manufacture pallets and crates, fabricate foams, and convert plastic corrugated, along with having heavy involvement with returnable packaging systems. To support our growth in these new products, we have significantly upgraded our design and engineering departments in our two major facilities. Both of our facilities have an ISTA approved testing laboratory along with two CAD stations and two computer driven cutting tables. Utilizing our technical skills gives us a competitive advantage in the market place; and we fully intend to exploit this resource.

We currently have two major manufacturing plants (Inman, South Carolina and Georgetown, Kentucky) and several support facilities located near large customers. We

will open a honeycomb manufacturing facility in Greer, SC in 2011. This will allow us to serve our SC, NC & GA markets.

Our marketing effort and long term growth plan is geared toward serving the needs of large customers- by providing packaging solutions that involve both product and process improvements with the overall goal of reducing the customers total cost.

### **VISION STATEMENT**

We will be an organization that constantly strives to satisfy our customers and other stakeholders by aggressively challenging the present in order to create our own future. We are committed to employee empowerment, mutual trust, and continuous improvement.

### **QUALITY POLICY**

To be the "Supplier of Choice", we commit to meet or exceed customer requirements and expectations through continuous improvement and innovation.

# Concept Packaging Group

## Employee Handbook

### 1. GENERAL PERSONNEL POLICIES

#### 1.1 Attendance and Punctuality Policy

##### OVERVIEW

It is the policy of the company to require employees to report for work punctually and to work all scheduled hours and any required overtime. Excessive tardiness and poor attendance disrupt work flow and customer service and will not be tolerated. Each employee at Concept Packaging Group plays a vital part in the success of our company. Therefore it is of the utmost importance that our team members are at work everyday as scheduled.

1. Supervisors should notify employees of their starting, ending, and break times. Employees are expected to be engaged in carrying out their duties during all scheduled work time and should be ready to begin working at their scheduled starting time.
2. Employees should notify their supervisor before their shift starts, whenever they are unable to report for work, know they will be late, or must leave early. Such notification should include a reason for the absence and an indication of when employee can be expected to report for work. If the supervisor is unavailable, notification should be made to top management.
3. Employees who are delayed in reporting to work more than thirty minutes and who have not notified their Supervisor of their expected tardiness may lose their right to work the balance of the work day.
4. In addition, employees who report for work without proper equipment or in improper attire may not be permitted to work. Employees, who report for work in a condition considered not fit for work, whether for illness or any other reason, may not be allowed to work.
5. At times, emergencies such as severe weather, fires, power failures, or earthquakes, can disrupt company operations. In extreme cases, these circumstances may require the closing of a work facility. Unless a member of Management contacts employees, they should assume the facility will operate. Please refer to "Emergency Closing/Inclement Weather" policy for further information.
6. When operations are officially closed due to emergency conditions, the time off from scheduled work will be unpaid. However, with supervisory approval, employees may use available paid leave time, such as unused vacation benefits.
7. Employees will not be required or permitted to work any period of time before or after scheduled starting or quitting time for the purpose of making up time lost because of tardiness, unauthorized absence, authorized

absence, or any other reason if the result will be that the employee works more than forty hours during the work week.

8. Employees must report to their Supervisor after being late or absent, give an explanation of the circumstances surrounding their tardiness or absence, and, when applicable, certify that they are fit to return to work. The Supervisor should record the information in the employee's file and forward a copy to the appropriate department. When appropriate, the Supervisor should counsel the employee on the importance of good attendance and warn that excessive tardiness or absences will lead to discipline, up to and including termination.
9. Employees must obtain permission from their Supervisor in order to leave the company premises during working hours and must punch out.
10. Unauthorized or excessive absences or tardiness will result in disciplinary action, up to and including termination. An absence is considered to be unauthorized if the employee has not followed proper notification procedures or the absence has not been properly approved.
11. Employees who are absent from work for two (2) consecutive days without giving proper notice to the company will be considered as having voluntarily quit. Please see the CPG No Call / No Show Policy for further details.
12. Please refer to the CPG Attendance Policy for complete details on the attendance program.

#### Excused Absences

- Family Medical Leave according to policy for applicable facilities and employees
- Personal Leave authorized by the company according to policy
- Jury Duty / Ordered by the court at no fault of the employee (Subpoena)
- Military Leave according to policy
- Funeral Leave according to policy

Due to production scheduling, vacation and/or personal days must be scheduled in advance.

## **1.2 Bulletin Boards**

To ensure proper communication to all employees, the company will utilize bulletin boards to post plant functions, communication meetings, workers' compensation laws, Federal and State Laws, safety information, policy changes, memos, and other employee information for all to read and understand. It is the responsibility of each employee to review the bulletin boards at least once per week.

Any other bulletin board notices must be approved and initialed by the Human Resources Department prior to posting. If anyone is found tampering with the bulletin boards, he/she will be subject to appropriate disciplinary action.

**The bulletin boards will be subject to the CPG Solicitation Policy.**

### **1.3 Computer and Telecommunication Systems Use Policy**

This policy establishes the guidelines for the proper use of Concept Packaging Group 's (the "company") computer and telecommunication systems and services by its employees, independent contractors, consultants, agents, representatives and other persons or entities ("Users") accessing or using host computers, file servers, workstations, stand-alone computers, laptop computers, telephones, software and internal or external communications networks (Internet, commercial online services, bulletin board systems, e-mail and voice mail systems) collectively the "Systems." The following guidelines apply to all Users of the Systems:

1. Users are responsible for utilizing the Systems in an efficient, effective, ethical and legal manner in accordance with this Policy.
2. The Systems, including hardware and software, are and remain at all times the property of the company. As such, all data, documents, information and messages created, composed, stored, sent and received on the Systems are and remain the property of the company.
3. The Systems are provided to assist in the conduct of the company's business. Unauthorized uses are strictly prohibited. The transmission or storage of commercial or personal advertisements, promotions, destructive programs (viruses and/or self-replicating code) or political material is prohibited.
4. The company reserves the right, but not the duty, to retrieve, read and monitor all data, documents, information and messages created, composed, stored, sent and received on the Systems. You should have no expectation of privacy in anything created, composed, stored, sent or received on the Systems (except telephone conversations). Nothing which is created, composed, stored, sent and received on the Systems is considered personal, confidential or private except for confidentiality benefiting the company. Use of the Systems by you constitutes your consent to the monitoring of data, documents, information, messages, and the Systems accesses by Users.
5. While the Systems may accommodate the use of passwords for security, the reliability of such for maintaining confidentiality cannot be guaranteed. You must assume that any and all messages may be read by someone other than the intended or designated recipient.
6. You should use the same care in drafting and distributing e-mail and other electronic documents and in sending voice mail messages as you would for any written communication.
7. Fraudulent, offensive, harassing, embarrassing, indecent, profane, obscene, intimidating or unlawful content shall not be created, composed, stored, sent or accessed using the Systems.
8. Users must comply with all software licenses. The copying of copyrighted materials is strictly prohibited. You may not install software onto your



individual computer or the network without first receiving authorization from the company's Information Services Department.

9. Your ability to access or connect to the files of other Users or to other computer systems through the network does not imply a right to access or connect to those files or systems or to use, alter or copy those files or systems unless specifically authorized by the User or operator of those files or systems.
10. Users are responsible for making certain that the documents kept on disc and/or hard drive memory are in compliance with the company's Document Retention Policy.
11. Violation of any of these guidelines could result in disciplinary action up to and including termination of employment and/or legal action.

### **1.3. CPG Cell Phone Policy**

Cell phones, personal or company provided are not allowed to be used while on official CPG business. This includes employees who are receiving mileage reimbursement while in their personal vehicle, unless authorized by the CPG Cell Policy.

**Furthermore, while on CPG property,** the use of cell phones is prohibited in all production and warehouse areas. The only cell phones allowed to be used in these areas are those issued or approved by CPG. Employees may use their own cell phones during designated break times in designated break areas. Cell phones must be kept off the production/warehouse floor.

Please refer to the CPG Cell Phone Policy for specific policy details.

### **1.4 EEO and Harassment-Free Workplace Policy**

As reflected in our Vision and Values, Concept Packaging Group strives to make this a special place to work with an atmosphere of mutual respect and professionalism. As employees of Concept Packaging Group, we all have a responsibility to live up to our values by creating an atmosphere every day in which each employee knows that he/she is valued as an individual and treated with respect and professionalism. This policy is a reflection of our vision and our commitment to complying with all laws governing discrimination and harassment.

#### **Policy Against Discrimination**

All applicants for employment and employees of Concept Packaging Group shall be treated equally without regard to race, color, religion, age, sex, disability, national origin, citizenship, ancestry, veteran status or any other classes protected by law. Our policy governs all aspects of employment including recruitment, selection, job assignment, compensation, promotion, discipline, termination and access to benefits and training. In order to provide equal employment opportunity to all job applicants and employees, employment decisions at Concept Packaging

Group are based on non-discriminatory factors such as merit, qualifications and abilities as determined by Concept Packaging Group.

### Policy Against Harassment

Concept Packaging Group maintains a working environment that is free from harassment based on race, color, religion, age, sex, disability, national origin, citizenship, ancestry, veteran status or any other classes protected by law. Such harassment in any manner or form by employees, contractors, vendors or customers is expressly prohibited.

Sexual harassment, one example of prohibited harassment, is defined as any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, because of an individual's sex, when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or is used as a basis for employment decisions; or
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment.

Sexual harassment includes prohibited harassing conduct toward a member of the same gender.

### Definitions

While it is not easy to define precisely the types of unwelcome conduct that could be harassment, examples of conduct prohibited by this policy include:

- verbal conduct (for example, sexual advances or requests for sexual favors, racial or sexual epithets, foul language, unwanted sexual flirtation, commentary about a person's body or physical appearance, sexual or ethnic jokes, derogatory statements or slurs, suggestive, lewd remarks and vulgar or offensive conversation and comments).
- Physical conduct (for example, touching of a sexual nature or assault).
- Visual harassment (for example, racially or sexually explicit or derogatory posters, magazines, calendars, cartoons or drawings and obscene gestures).
- Electronic means (for example, using email, voice mail, the Internet or any other Concept Packaging Group systems to create, compose, store, send or access offensive, harassing, embarrassing, indecent, profane, obscene, intimidating or unlawful content).

Even if conduct does not rise to the level of legally actionable conduct, it is, nonetheless, prohibited at Concept Packaging Group.

### Complaint Procedure

Concept Packaging Group is committed to enforcing this policy, promptly investigating conduct prohibited by this policy and taking appropriate remedial action in instances where it learns of or has reason to know of the occurrence of prohibited discrimination or harassment. Our efforts, however, will depend largely on employees telling us about inappropriate workplace conduct.

If you believe that you have been subjected to conduct which is prohibited by this policy, you must report it promptly so that, whenever possible, any problems can be investigated and remedied at the earliest opportunity. The following individuals have been designated specifically by Concept Packaging Group to receive reports relating to conduct prohibited by this policy:

- your immediate supervisor or manager
- your supervisor's or manager's superior
- Human Resources Manager

You are not required to first report the incident to your supervisor or manager; you may bypass the chain of command and choose from the listed options.

Reports may be made verbally or in writing. All reports of conduct prohibited by this policy will be promptly investigated, handled with discretion and dealt with appropriately. Concept Packaging Group will not tolerate and will take appropriate action to correct violations of this policy including disciplinary measures, up to and including termination of employment. Violations of this policy can also result in personal legal and financial liability.

#### No Retaliation

Threats or acts of retaliation or retribution against employees who make use of the complaint procedure will not be tolerated. Use the procedures described above to report any such retaliatory actions.

### **1.5 Emergency Closings/Inclement Weather**

At times, emergencies such as severe weather, fires, power or water failure, or any acts of nature can disrupt company operations. In extreme cases, these circumstances may require the closing of the work facility. In the event that such an emergency occurs, please refer to your Regions Emergency Response Program.

When operations are officially closed due to emergency conditions, the time off from scheduled work will be unpaid. However, with supervisory approval, employees may use available paid leave time, such as unused vacation benefits.

In cases where an emergency closing is not authorized, employees who fail to report for work will not be paid for the time off and the absence may count as an occurrence. Employees in essential operations may be asked to work on a day when operations are officially closed. In these circumstances, employees who work will receive regular pay.

## **1.6 Family or Personal Relationships**

Employment of relatives or individuals with personal relationships in positions where one might have influence over the other's terms or conditions of employment (for example, evaluations, wages, schedule, work assignments) may create a conflict of interest. To prevent this, and any perception of favoritism, it is essential that CPG maintain a policy regarding the employment, promotion, transfer and supervision of relatives or individuals with whom one has a personal relationship.

For these purposes, "relative" means spouse, mother, father, sister, brother, child, stepchild, grandparent, grandchild, aunt, uncle or cousin, and "personal relationship" means a romantic, sexual or live in relationship (whether or not romantic or sexual). It will be the employee's responsibility to advise his/her immediate supervisor of any employment situation that is not in accordance with this policy. When this occurs, the situation will be brought to the attention of the Human Resources Department and reassignments may be made consistent with this policy. Failure to promptly advise management of these situations may result in disciplinary action up to and including termination.

## **1.7 Outside Employment**

An employee may hold a job with another organization as long as he or she satisfactorily performs his or her job responsibilities with Concept Packaging Group. All employees will be judged by the same performance standards and will be subject to Concept Packaging Group's scheduling demands, regardless of any existing outside work requirements.

If Concept Packaging Group determines that an employee's outside work interferes with performance or the ability to meet the requirements of Concept Packaging Group as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with Concept Packaging Group. Outside employment will present a conflict of interest if it has an adverse impact on Concept Packaging Group.

## **1.8 Privacy of Protected Health Information**

Concept Packaging Group complies with the Health Insurance Portability and Accountability Act (HIPAA) Privacy regulation concerning employee's personal health information. Any questions you may have about this policy should be directed towards the Corporate Human Resources Manager will serve as the company's Privacy Officer.

## **1.9 Probationary Period**

The probationary period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. Concept Packaging Group uses this period to evaluate employee capabilities, work habits, and overall performance. Either the employee or Concept Packaging Group may end the

employment relationship at will at any time during or after the probationary period, with or without cause or advance notice.

All new and rehired employees work on a probationary basis for the first 60 calendar days after their date of hire. Employees who are promoted or transferred within Concept Packaging Group must complete a secondary probationary period of the same length with each reassignment to a new position. Any significant absence, such as a Leave of Absence, will automatically extend a probationary period by the length of the absence. If Concept Packaging Group determines that the designated probationary period does not allow sufficient time to thoroughly evaluate the employee's performance, the probationary period may be extended for a specific period. If an employee receives a written counseling during their 60-day probationary period, it will be grounds for termination.

*Your eligibility to accrue and receive various CPG company benefit programs commence upon your CPG hire date. Time served in any employment capacity prior to your CPG hire date will not count as time served for these benefits. The only exception will occur when a CPG employee leaves CPG and is rehired within 12 months of leaving. In that instance, the employee will return with seniority based upon their original hire date. Should the employee return after 12 months of leaving, then their eligibility to receive CPG benefits begins with their new hire date.*

#### **1.10 Rehire Policy**

It is the goal of Concept Packaging Group to maintain a work force that best represents the direction and goals of the company. In doing so, we strive to maintain employees with good work ethics, solid job skills, professionalism, and a stable work history. In order to foster this type of environment, we have defined our rehire policy below.

Employees that left Concept Packaging Group voluntarily and in good standing will be reviewed for rehire eligibility on a case-by-case basis. Review of rehires will involve Human Resources, the hiring Manager, and other necessary managers affected by the rehire.

#### **1.11 Rest and Meal Breaks**

Each workday, full-time nonexempt employees are provided with rest periods. Supervisors will advise employees of the regular rest period length and schedule. To the extent possible, rest periods will be provided in the middle of work periods. Since this time is counted and paid as time worked, employees must not be absent from their workstations beyond the allotted rest period time. Employees are not allowed to leave the premises during breaks.

All full-time employees are provided with one meal period each workday. Supervisors will schedule meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and usually will not be compensated for that time.

#### **1.12 Drug and Alcohol Use**

It is CPG's desire to provide a drug-free, healthful, and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and

physical condition to perform their jobs in a satisfactory manner. Please see the CPG Drug Free Workplace Policy for complete details on this program.

While on CPG premises, which includes all CPG parking areas, and while conducting business-related activities off CPG premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol, illegal drugs or the improper use of prescription drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.

To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Drug/Alcohol testing may occur randomly, for reasonable suspicion, regulatory compliance and after any accident or near miss or at any other time deemed necessary by management. Refusal to submit to, or interfere with testing may result in disciplinary action, up to and including termination of employment.

It is the right of Concept Packaging Group to randomly search the company premises for illegal drugs. The CPG premises include all CPG buildings and parking areas. All employees are required to cooperate with a random drug search which may include and is not limited to opening personal items such as, lockers, purses, wallets, pockets, cars, tool boxes, etc. Refusal to cooperate may result in disciplinary action, up to and including termination of employment.

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment. Such violations may also have legal consequences.

Employees with questions or concerns about substance dependency or abuse are encouraged to discuss these matters with Human Resources to receive assistance or referrals to appropriate resources in the community. Employees with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their supervisor or the Human Resources Manager without fear of reprisal.

### 1.13 **Time Clock**

To ensure that weekly paychecks are processed accurately, all hourly and salary non-exempt employees will be required to document their time either electronically or manually in and out each workday for payroll and identification purposes. If an employee has to leave the plant temporarily, he/she must log this time under their particular method both out and then in upon their return. Employees are not to leave the plant without prior approval from their supervisor. Occurrences will be documented on the employee's attendance record for failure to clock in/out as explained in our Attendance and Punctuality Policy. Employees have to clock in and out themselves. Another employee should not be allowed to clock in or out for another person.

### **1.14 Visitors in the Workplace**

To provide for the safety and security of employees and our facilities at CPG, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Because of safety and security reasons, visits by family and friends must be arranged in advance and permission granted by the plant manager. In cases of emergency, employees will be called to meet any visitor outside their work area.

All visitors should enter CPG at the appropriate designation and follow the local CPG Visitor Program guidelines.

If an unauthorized individual is observed on CPG's premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the front lobby.

### **1.15 Workplace Violence Prevention**

Concept Packaging Group is committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, Concept Packaging Group has adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur during business hours or on its premises.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay", or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances including explosives are strictly prohibited. Any employee known to be in possession of a weapon or firearm at work will be subject to appropriate disciplinary action up to and including termination.

Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, including off duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local law.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate supervisor or any other member of management. This includes threats by employees, as well as threats by customers, vendors, solicitors, or other members of the public. When reporting a threat of violence, you should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a supervisor. Do not place yourself in peril. If you see or hear a commotion or

disturbance near your work station, do not try to intercede or see what is happening.

Concept Packaging Group will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, Concept Packaging Group may suspend employees, either with or without pay, pending investigation.

Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines may be subject to prompt disciplinary action up to and including termination of employment.

## **2. EMPLOYEE BENEFITS**

### **2.1 Benefits Continuation – COBRA**

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under CPG's health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under COBRA, the employee or beneficiary pays the full cost of coverage at CPG's group rates plus an administration fee. CPG provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under CPG's health insurance plan. The notice contains important information about the employee's rights and obligations.

### **2.2 Bereavement Leave**

Employees who wish to take time off due to the death of an immediate family member should notify their supervisor immediately.

Up to 3 days of paid bereavement leave may be provided to eligible employees in the following classification(s) for immediate family and 1 day for other family:

\* Regular full-time employees

Bereavement pay is calculated based on the base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials.

Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements. Employees may, with their supervisors' approval, use any available paid leave for additional time off as necessary.



**CPG defines "immediate family" as the employee's spouse, child, parent, sibling(s), grandparent(s), and grandchildren as well as spouse's parents.**

**Other Family is defined as sister-in-law, brother-in-law, daughter-in-law, and son-in-law as well as the spouse's grandparents.**

## **2.4 Educational Assistance**

**Policy:** It is the policy of the company to provide educational assistance to its employees in accordance with the guidelines established below. Please refer to the CPG Tuition Policy for complete details.

### **Comments:**

- To be eligible for educational assistance, employee must have regular full-time status and at least one year of service with the company.
- Eligible employees may be reimbursed only for courses of study that the location manager determines are directly related to the employee's present job or that will enhance the employees' potential for advancement to a position within the company and to which the individual has a reasonable expectation of advancing. In addition, only courses that are offered by pre-approved institutions of learning will be eligible for reimbursement.
- Employees who want educational assistance must obtain approval from Management before enrollment. This approval will not be granted without a positive recommendation by the employee's supervisor. Supervisors must obtain funding for the assistance before making a positive recommendation.
- Top Management and supervisors normally should consider the following factors in evaluating requests for educational assistance:
  - a. The nature and purpose of the course of study;
  - b. The benefits to be derived by the employee and the company;
  - c. The employee's level of responsibility and length of service;
  - d. The estimated cost; and
  - e. Any potential lost time or productivity while the employee participated in the program.
- Employee reimbursement for eligible educational assistance will normally be based upon the grade received for the course, as follows:
  - f. For a grade of "A," 100% of reimbursable costs;
  - g. For a grade of "B," 75% of reimbursable costs; or
  - h. For a grade of "C", 50% of reimbursable costs.
- No reimbursement will be made for a grade lower than "C". For a "pass-fail" course, reimbursable costs will be paid at 100% for passing the course. Employees receiving reimbursement from any outside sources, such as the Department of Veterans Affairs or scholarships, may use the above formula but the company's portion may not make the total exceed 100% of the reimbursable cost. The maximum total reimbursement per year is \$1,000.00.

Employees seeking reimbursement for educational expenses must submit to Top Management a certified transcript of their grades and receipts for the expenses incurred. The company will then reimburse to the employee the applicable percentage of the cost of tuition, textbooks, registration, and laboratory and library fees. However, employees who take courses at the specific request or direction of management may be reimbursed for all costs in advance.

Employees who are terminated during enrollment because of a reduction in force or job elimination, or who are unable to complete an approved course because of transfer within the company, will be reimbursed for the full amount of the costs incurred up to the date of termination or transfer. Employees will not be reimbursed for the expenses associated with the course if they voluntarily leave the company or are terminated for reasons other than those listed above.

Employees seeking reimbursement for educational expenses must agree in writing to repay the company in full if they leave the company voluntarily or are terminated within two (2) years from the date of reimbursement.

Employees are expected under normal circumstances to schedule class attendance and the completion of study assignment outside of their regular working hours. It is expected that educational activities will not interfere with the employee's work, and unsatisfactory job performance during enrollment may result in forfeiture of educational assistance and termination of employment.

Records of all education programs completed by each employee will be maintained by Human Resources.

## **2.5 Family and Medical Leave**

On occasion you may find it necessary to be out from work while you are ill or to care for a family member. The Family and Medical Leave Act of 1993 (FMLA) allows employees nationwide to be with family members in their time of need. Under the FMLA, eligible employees may receive 12 weeks (26 weeks for Military Caregiver Leave) of leave during a 12-month period for certain family and medical reasons as well as reasons related to a covered family members military service. Employees are eligible if they have worked for a Company for at least 12 months, and for at least 1,250 hours during the previous 12 months, and if there are at least 50 employees employed by the Company within 75 miles of the work site.

Reasons for taking leave: The FMLA permits you to take leave for any of the following reasons: (1) to care for your child after birth, or placement for adoption or foster care; (2) to care for your spouse, son or daughter or parent who has a serious health condition; or (3) for a serious health condition which makes you unable to perform the functions of your job; (4) to care for your spouse, parent, child or next-of-kin who is a covered service member if he or she is injured while on active duty; or (5) to assist your spouse, parent or child if they are a member of the National Guard or Reserves of the U.S. Armed Forces and are on active duty or called to active duty in federal service and your absence is due to one or more qualifying exigencies arising out of the active duty or call to active duty.

Leave will not be granted to allow you time off to seek employment elsewhere or to work for another employer.

Please see Human Resources for details on the FMLA Policy and its guidelines.

**Job Benefits and Protection:** When FMLA leave is requested, Human Resources will explain to you the requirements concerning your health coverage while on leave. Upon return from FMLA leave, most employees will be restored to their same or equivalent positions with equivalent pay, benefits, and other employment terms.

**Questions and Forms:** Should you have any questions about the FMLA, please see Human Resources. You may be required to complete forms other than those described above to be eligible to take FMLA leave; therefore, see Human Resources as soon as you are aware FMLA leave will be needed.

## **2.6 Health, Dental, and Life Insurance**

CPG offers insurance coverage for hospitalization, medical, surgical and dental services to help protect you from the financial burden due to possible injury or illness. All full-time hourly employees become eligible for the benefit after completion of 60-day probationary period. Full-time employees having dependents may wish to cover them under our insurance plan. After being hired, employees desiring to cover dependents should contact the Human Resources Department for more information. Open enrollment will be held annually for employees to make changes to their coverage. Exact details of your insurance coverage are provided in a separate booklet (plan summary descriptions) which you are given upon hire and are available from the Human Resources Department. Life insurance in the amount of \$20,000 is provided by the company at no cost to you. Additional Voluntary Life Coverage will be made available to you on an annual basis. CPG reserves the right to adjust the plan as needed including employee premiums based on costs from the insurer.

Should you ever need any assistance with your insurance or if you ever have any questions regarding your insurance program, please feel free to contact the Human Resources Department.

An employee on a FMLA, personal or medical leave may have his/her (medical, dental, and life) insurance coverage continued during the leave providing the employee continues to pay their portion of the insurance premium to Payroll Deposit on a weekly basis.

## **2.7 Holidays Policy**

CPG will grant holiday time off to all employees on the holidays listed below:

- New Year's Day (January 1)
- Good Friday (Friday before Easter) / INMAN ONLY
- New Year's Eve – KENTUCKY ONLY

- Memorial day
- Independence Day (July 4)
- Labor Day (first Monday in September)
- Thanksgiving (fourth Thursday in November)
- Day after Thanksgiving
- Christmas Eve (December 24)
- Christmas (December 25)

CPG will grant paid holiday time off to all eligible employees who have completed 60 calendar days of service in an eligible employment classification. Eligible employee classification(s):

\* Regular full-time employees

To be eligible for holiday pay, employees must work the last scheduled day immediately preceding and the first scheduled day immediately following the holiday.

A recognized holiday that falls on a Saturday will normally be observed on the proceeding Friday. A recognized holiday that falls on a Sunday will normally be observed on the following Monday.

If eligible nonexempt employees work on a recognized holiday, they will receive holiday pay plus wages at one and one-half times their straight-time rate for the hours worked on the holiday.

Paid time off for holidays will not be counted as hours worked for the purposes of determining overtime.

## **2.8 Job Posting and Referral**

CPG provides employees an opportunity to indicate their interest in open positions and advance within the organization according to their skills and experience. In general, notices of all regular, full-time job openings are posted, although CPG reserves its discretionary right to not post a particular opening.

Job openings will be posted on the employee bulletin board(s). Each job posting notice may include the dates of the posting period, job title, department, location, job summary, essential duties, and qualifications (required skills and abilities).

To be eligible to apply for a posted job, employees must have performed competently for at least six months in their current position. Employees who are within the 1<sup>st</sup> six months of a written counseling, or are on probation or suspension are not eligible to apply for posted jobs. Eligible employees can only apply for those posted jobs for which they possess the required skills, competencies, and qualifications.

To apply for an open position, employees should follow the method of applying per the job posting requirements.

## **2.9 Jury Duty**

It is your civic duty as a citizen to report for jury duty whenever called. If you are called for jury duty, you must notify your supervisor, the facility manager or a member of management within forty-eight (48) hours of receipt of the jury summons. The Company will permit you to take the necessary time off. On any day or half-day you are not required to serve, you will be expected to return to work. You must present a statement of jury service issued by the Clerk of Court to a member of management. In order to receive your normal pay (defined as 8 hours per day) you will need to sign your compensation check from the court over to the Company.

Either CPG or the employee may request an excuse from jury duty if, in CPG's judgment, the employee's absence would create serious operational difficulties.

CPG will continue to provide their share of health insurance benefits for the full term of the jury duty absence. Employees must continue to pay their employee portion of the healthcare care and dental insurance during jury duty leave of absences.

Vacation and holiday benefits will continue to accrue during jury duty leave.

## **2.10 Military Leave**

Employees are entitled to such leave of absence and reinstatement upon return from leave of absence for military service (including Reserve and National Guard duty) as may be provided by applicable state and federal law. The provisions of such laws change from time to time and for that reason no effort is made to set forth the law in this policy.

CPG shall pay for military leave for those that have to serve an annual leave for up to two weeks. Any deployments that are issued shall be time off unpaid while on leave of absence for military service. During any deployments, employees will be classified as inactive, but will still accrue any benefits per Uniformed Services Employment and Reemployment Act (USERRA).

## **2.11 Personal Leave**

A personal leave of absence, unpaid, may be granted for compelling personal reasons, provided adequate arrangements can be made. Personal Leave cannot be used in conjunction, before, and/or following FMLA, Short Term Disability, Workers' Compensation, or any other leave defined in a CPG policy. Employees shall request personal leaves in writing (complete leave of absence form) with as much advance notice as possible, preferably 30 days.

Personal leaves must be approved by the General Manager and Human Resources and will be granted for justifiable reasons at CPG's discretion, provided the leave does not seriously disrupt CPG's operations. Employees who fail to return to work on the first scheduled workday following expiration of the personal leave may be subject to termination.

Company 401K contributions will not take place during the leave. During the leave, the company will continue all group insurance for a maximum of 4 weeks, providing the personal leave of absence was approved for a 4-week period and the employee arranges to have their portion of the premium paid at least on a weekly basis.

Employees who work any other jobs during the granted period of personal leave will be considered to have voluntarily quit and accepted employment elsewhere.

## **2.12 Income Continuation Program**

CPG currently provides an Income Continuation Program (ICP) benefits plan to eligible employees who are unable to work because of a qualifying disability due to a personal injury or illness. All full time employees become eligible and are automatically enrolled upon completion of their 60-day probationary period.

Contact the Human Resources Department for more information about ICP benefits.

## **2.13 Workers Compensation Benefits**

CPG provides a comprehensive workers' compensation insurance program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses must inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

Neither CPG nor the insurance carrier will be liable for the payment of workers' compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by CPG.

## **2.14 Vacation Policy**

Vacation time off with pay is available to eligible employees to provide opportunities for rest, relaxation and personal pursuits. Employees in the following employment classification(s) are eligible to earn and use vacation time as described in this policy:

- \* Regular full-time employees

The amount of paid vacation time employees receive each year increases with the length of their employment. Please refer to the CPG Vacation Policy for complete details.

**Reminders:**

- If an employee with one (1) year of service or more does not use his/her vacation within the current calendar year, he/she will lose it. Vacation must be used between January 1 and December 31;
- Vacation can be taken in the following increments if APPROVED:
  - Quarter, half, or full-day increments (e.g., 2, 4, or 8 hour OR 2.5, 5, or 10 hour increments)

**Scheduling Vacation:**

All employees are required to schedule vacation in advance. CPG can only allow a limited amount of emergency vacation days to be taken without notice. The department supervisor may limit the number of employees that are on vacation at one time according to business needs. Vacation is scheduled on a first come, first serve basis. The first employee to request the vacation will be the one that is eligible to receive it.

If an employee is aware of a holiday that is not recognized by Concept Packaging, but would like to request vacation for that day, the vacation must be scheduled in advance.

Please see Human Resources or your Supervisor if you have any questions.

**2.15 401(k) Retirement/Savings Plan**

CPG has an established a 401(k) savings plan to currently provide employees the potential for future financial security for retirement.

To be eligible to join the 401(k) savings plan, you must complete the eligibility period of six months service and be 18 years of age or older. Eligible employees may participate in the 401(k) plan subject to all terms and conditions of the plan.

The 401(k) savings plan allows you to elect how much salary you want to contribute (up to specified limits) and direct the investment of your plan account, as you can tailor your own retirement package to meet your individual needs. CPG also contributes an additional matching amount to each associate's 401(k) contribution.

Employees are always 100% vested in their personal contributions. Please see Human Resources for vesting schedule of company contributions.

Because your contribution to a 401(k) plan is automatically deducted from your pay before federal and state tax withholdings are calculated, you save tax dollars now by having your current taxable amount reduced.

Complete details of the 401(k) savings plan are described in the Summary Plan Description provided to eligible employees. Contact the Human Resources Department for more information about the 401(k) plan.

**3. SAFETY**

It is the policy of the company to comply with all applicable federal, state and local health and safety regulations and to provide a work environment as free as practicable from recognized hazards. Employees are expected to comply with all safety and health requirements whether established by the company or by federal, state, or local law.

Employees must report any unsafe condition to your supervisor immediately, i.e., frayed electrical wires, etc. Employees must report accidents immediately or at the absolute latest prior to the start of their next shift. If employees do not report accidents within this time frame, it will result in disciplinary action, up to and including termination. It will result in a written counseling for the 1<sup>st</sup> offense.

The company has appointed a Safety Committee to oversee the company's safety policies and procedures. The Safety Committee's responsibilities include:

- a. Monitoring compliance with company safety rules and regulations and the applicable safety and health standards established as a result of the Occupational Safety and Health Act of 1970 and any other applicable federal, state, or local employee safety laws or regulations;
- b. Developing and implementing written safety plans of programs as needed;
- c. Investigating, correcting, and reducing recognized unsafe and unhealthful working conditions or potential hazards; conducting periodic safety and health inspections of all work areas, machinery, equipment, and any recognized potentially hazardous company facilities.
- d. Representing the company during investigations conducted by the Occupational Safety and Health Administration ("OSHA"), by any other federal, state, or local safety and health personnel, or by insurance underwriting representatives;
- e. Organizing the safety training and retraining of employees;
- f. Monitoring compliance with the various requirements established by any law or by the organization's insurance carrier relating to record keeping and the retention of records;
- g. Establishing fire prevention and fire fighting programs, conducting fire drills, testing fire equipment, and enforcing no smoking policies where appropriate;
- h. Developing contingency disaster preparedness plans;
- i. Investigating all accidents, hazardous incidents, and fires involving company employees, or which occur on company premises, and preparing the required reports;
- j. Posting notices as may be required by law or by the organization's insurance carrier; and
- k. Evaluating the effectiveness of the company's safety program.

### **3.1 Personal Appearance/Dress Code**



Our goal is to present ourselves as a world class company. This means that modest attire appropriate for a manufacturing environment is required. Some items therefore, are not appropriate, including: crop, halter, tube tops, muscle shirts, or other items that are overly revealing, whether worn by males or females; clothes with excessive tears or holes, and any article of clothing with lewd or suggestive words or images.

For safety reasons it is mandatory that rings (other than wedding bands), watches and other loose fitting jewelry be removed while performing production, assembly or material handling operations. In addition, overly baggy or loose fitting clothes should not be worn to work.

We reserve the right to send anyone without proper attire home without pay and will consider such action as an unexcused absence. If you are not sure about an item, then it is probably not appropriate to wear to work. If you have questions, please feel free to check with your Supervisor or Human Resources.

## **4. COMPENSATION**

### **4.1 Direct Deposit**

As an employee of CPG, your paycheck will be automatically direct deposited each payday to one, or more, bank accounts of your choice. Your first check will be a manual check until direct deposit is established and verified for correct account numbers. For more details, or should you want to make changes to your bank accounts, please see Human Resources.

### **4.2 Overtime**

Overtime may be required in order to meet customer needs. We expect our employees to be ready and willing to work overtime when requested. Employees who do not report to work when scheduled for overtime or those who refuse to work overtime may be subject to disciplinary action. Overtime will be paid at a one and one-half times (1.5) rate after working 40 hours in any given one week period. Pay or work period is calculated from 12:01 Monday through midnight on Sunday.

Time off or any non-work time such as leave of absence, holidays, jury duty, Bereavement Day, or any other non-work day will not be considered hours worked for purposes of performing overtime calculations.

You should not work any overtime unless it has been requested and approved in advance by your Supervisor. Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

### **4.3 Payday**

Non-exempt employees are paid weekly every Thursday. Paychecks are made available to all hourly employees no later than Thursday at 3:00 P.M. Exempt

employees are paid biweekly on every other Thursday. Each paycheck will include earnings for all work performed through the end of the previous payroll period.

Those employees hired prior to June 23, 2005, who elected to receive a manual paycheck and discover a mistake in their paycheck, lose their paycheck or have it stolen should notify their immediate supervisor immediately. In the case of a mistake, the error will be remedied. In the case of loss or theft, the accounting department will attempt to stop payment on the check and reissue a new one to the employee. However, the employee is solely responsible for the monetary loss, and the company cannot be responsible for the loss or theft of a check if it cannot stop payment of the check. Cost of check stop payments will be deducted from the employee's check on succeeding occurrences.

Shift differential will be paid for second and third shift employees. Employees should discuss any questions or concerns regarding their rate of pay and other compensation issues with their supervisor.

#### **4.4 Required Wage Withholding**

In accordance with federal and state laws, as well as voluntary deductions you designate, the following deductions shall be withheld from your wages:

- Federal Income tax
- State Income tax
- Social Security
- Medicare
- Garnishments
- Other deductions authorized by the employee or the courts

#### **Voluntary**

- Group Health, Dental, Long Term Disability and Life Insurance
- 4011-K retirement plan

### **5. EMPLOYEE CONDUCT**

#### **5.1 Corrective Action Policy**

##### **Overview**

Concept Packaging Group's success will be built by the dedication and hard work of Concept employees. In order to continue that success, all employees must maintain high standards in the areas of attendance, job performance, and behavior. When an employee fails to perform in one of these areas, it may negatively affect that employee, other employees, and the company as a whole.

CPG has developed this Corrective Action Policy to deal honestly and fairly with employee performance issues. It is a system that is designed to notify an employee of a performance issue and reinforce to the employee company expectations. Once notified, the employee must perform and meet company expectations.

The circumstances of any given case will dictate the corrective action that will be taken. Employees should be aware that progressive disciplinary action is not always used. If the company considers the best conduct serious enough, the employee may be discharged immediately.

### Scope

This policy covers corrective action for all employees.

#### A. General Information

Separate policies cover what performance issues may lead to corrective action (i.e. Attendance Policy). This Corrective Action Policy will contain several types, some of which are more serious than others.

With each type of Corrective Action, the employee involved may be notified of the performance issue, reminded of company expectations, and given a chance to improve. If the employee performs appropriately, there will be no further corrective action. However, if the employee fails to perform appropriately, he or she will receive a more serious type of corrective action, up to and including termination, with each failure in performance. The types will be explained in more detail in the next section.

In addition, each type of corrective action may be active for a specified period of time. If future performance issues occur while a corrective action type is still active, the employee will progress to more serious types of corrective action. When a corrective action type is no longer active, the employee may start over in the Corrective Action Program.

Employees who are in an active corrective action period who then go out on any type of CPG leave of absence program lasting one week or longer, shall have their active corrective action period extended by the amount of leave exercised.

For example, if an employee was on a 12-month active corrective action period and were to go out on FMLA for a period of 8 weeks, then immediately upon their return, 8 weeks shall be added to their corrective action period end date.

#### B. Types Of Corrective Action

##### Verbal Counseling

The employee has demonstrated a problem. The employee's supervisor will meet with the employee to discuss the performance

issue and remind the employee of the company's expectations in that area. This type of corrective action will be documented in writing and will be active for six months.

#### Written Counseling

The supervisor will again meet with the employee to discuss the problem and reinforce company expectations. Written counselings are often written to emphasize the seriousness of a given situation. These counselings remain active in an employee's file for one complete year from the time it is written. Two written counselings for any reason within a (12) consecutive month basis will result in termination.

Active written counselings where the employee is within the 1<sup>st</sup> six months of serving out that corrective action eliminate an employee's ability to a transfer or being able to be considered for promotion. If business conditions warrant, management can make exceptions in order not to disrupt normal business activities.

#### Termination

At this point, the employee has exhausted all options and employment will be terminated.

#### C. Probationary Period

The first 60 days of employment are considered a probationary period. During this time, new employees will be evaluated for their ability to establish a good attendance and job performance record. Job performance or attendance problems of employees in the probationary period will be addressed outside the scope of the Corrective Action Policy.

Actions taken may not necessarily follow the types of corrective action outlined in the policy. Concept Packaging Group management will determine the proper level of disciplinary action up to and including termination.

Additionally, when an employee is promoted or transferred to another position, he/she will undergo another 60-day probationary period.

#### D. Serious Misconduct

Some performance issues are so serious that it is appropriate to immediately take high levels of Corrective Action, up to and including termination of employment, in order to properly address the situation. CPG management reserves the right to determine appropriate levels of Corrective Action. The following are some, but not all, of the performance issues that fall into this category:

1. Dishonesty, including falsifying company records. This includes applications.
2. Falsification, dishonesty, or failure to properly complete any quality check or responsibility.
3. Substance abuse, and the use, possession, sale, or transfer of alcohol or illegal drugs on company property or in company vehicles; reporting to work under the influence of intoxicants or drugs.
4. The destruction or malicious damage of company property or a fellow employee's property on company premises.
5. The possession of weapons or explosives on company property including employee's vehicle.
6. Theft of company or another employee's property.
7. Violation of the company "No Solicitation- No Distribution" rules.
8. Excessive absenteeism or tardiness, including failure to report or call in for three consecutive work-days ("Three day No-call, No-show").
9. Coercing, gossiping, intimidating, threatening, or harassing fellow employees or using insulting language toward them.
10. Engaging in fighting or in any provocations that could lead to fighting.
11. Conducting oneself in a manner contrary to recognized standards of morality and decency on company premises.
12. Engaging in horseplay, sleeping, gambling, or card playing during work.
13. Serious violation of safety rules, practices, and/or procedures.
14. Refusal to comply with instructions of a member of management (Insubordination).
15. Unsatisfactory job performance or unsatisfactory response to company training.
16. Engaging in sexual harassment or other harassment of any employee or other individual at work, including any violation of the Equal Employment Opportunity and Harassment Free Workplace Policy.
17. Either leaving company property during normal scheduled work hours or returning to work during non-scheduled work hours without permission from immediate supervisor. Employee may return to front office during office work hours for administrative issues.
18. Taking unauthorized photographs.

19. Violation of the telephone, cell phone and mail systems usage policy.
20. Unauthorized entry by an employee or visitor.
21. Posting, removing, or tampering with bulletin board notices.
22. Violation of the personal appearance/dress code policy.
23. Walking off job.

E. CPG management reserves the right to add to, delete from or change this policy at any time.

## **5.2 Problem Solving (Open Door Policy) Procedure**

### **Introduction**

1. Immediate supervisors shall take the initiative in encouraging the use of the problem solving procedure where problems or misunderstandings are known to exist and have not been openly expressed.
2. Every effort will be made to settle problems and misunderstandings promptly at the earliest possible stage.
3. No level of management above first line, shall answer a complaint without first ascertaining that it has been taken up with the employee's immediate supervisor and proper channels followed.

An employee having a grievance has the following steps available:

- a. The employee should first discuss his or her problem with his or her immediate supervisor.
- b. If the immediate supervisor cannot solve the problem to the satisfaction of the employee, he or she will go with the employee to the Production Manager within two working days to discuss the situation or arrange a private meeting for the employee.
- c. At this step, the Production Manager will inform the Plant Manager that a grievance has developed and will consult with the Human Resources Manager before a decision is made. Should the employee desire to discuss his or her problem further, the grievance will be reduced to writing by the employee and the Human Resources Manager.
- d. If the problem is not solved to the satisfaction of the employee, the Human Resources Manager will establish a meeting within two working days with the next higher authority, where the situation will be discussed with the employee and the Human Resources Manager.
- e. If the problem is still not settled to the employee's satisfaction, the Human Resources Manager will arrange a meeting within one week with the highest on-site management official, whose decision will be final.

- f. If the employee does not feel comfortable with an individual in the process, the employee may skip that particular individual and go to the next step in the process.

### **5.3 Personal Data Changes**

It is the responsibility of each employee to promptly notify Concept Packaging Group of any changes in personal data. Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of an emergency, and other such status reports should be accurate and current at all times. If any personal data has changed, please notify the Human Resources Department.

### **5.4 Solicitation Policy**

***Solicitation and distribution of literature by non-employees on company property is prohibited.***

Solicitation by employees on company property is prohibited when the person soliciting or the person being solicited is on working time. Working time is considered the time employees are expected to be working and does not include rest, meal, or other authorized breaks.

Distribution of literature by employees on company property is prohibited during working time.

Distribution of literature by employees on company property in working areas is prohibited at all times.

### **5.5 Telephone, Cell Phone and Mail Systems Usage**

Personal use of the telephone for long distance and toll calls is not permitted. Employees should practice discretion when making local personal calls and may be required to reimburse Concept Packaging Group for any charges resulting from their personal use of the telephone.

Any emergency incoming phone calls should be addressed to Human Resources. These messages will be forwarded to the employee immediately. No phone calls or messages other than emergencies will be accepted.

The use of Concept Packaging Group's postage machines for personal correspondence is not permitted. Please direct any questions you may have pertaining to any of these procedures to Human Resources.

### **5.6 Tobacco-Free Workplace**

To maintain a safe, comfortable, and healthy workplace, Concept Packaging Group provides a Tobacco Free Workplace/Campus. The use of tobacco products will not be permitted at any CPG facilities nor surrounding property.

For specific policy details, please refer to the CPG Tobacco Free Workplace Policy with Human Resources.

## **5.7 Use of Equipment and Vehicles**

Equipment and vehicles essential in accomplishing job duties are expensive and may be difficult to replace. When using company property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines. Additionally, employees must and be authorized to use the equipment either through certification, license, or training.

Please notify your Supervisor or Manager if any equipment, machines, tools, or vehicles appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Your Supervisor or Manager can answer any questions about an employee's responsibility for maintenance and care of equipment or vehicles used on the job.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment or vehicles may result in disciplinary action up to and including termination. Furthermore, for employees operating company vehicles, avoidable traffic and parking violations may result in disciplinary action up to and including termination.