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EMPLOYEE HANDBOOK

Introduction

Iwaki America, Inc. is a wholly owned subsidiary of Iwaki Co., Ltd. based in Tokyo, Japan, one of the world's leading pump manufacturers. Iwaki America is comprised of four business units:

- Iwaki Pumps manufactures metering pumps, chemical delivery pumps, sealless recirculation pumps, and non-metallic magnetic drive centrifugal pumps for a wide variety of fluid handling applications.
- Walchem manufactures a broad range of analytical controllers and sensors for the global water treatment market.
- Iwaki Aquatics manufactures aquatic systems used for animal research in university, hospital, and biological laboratory environments.
- Iwaki Air manufactures air-operated double diaphragm pumps used in chemical transfer of liquids across a wide variety of applications.

Whether you have just joined us or have been at Iwaki America for a while, we are confident that you will find our company a dynamic and rewarding place in which to work.

These guidelines were developed to describe some of the expectations of our employees and to provide guidance concerning the policies, programs, and benefits available to eligible employees.

The policies described in these guidelines are not conditions of employment, nor is the content of the material intended to create a contract of employment between Iwaki America and its employees. Your employment with Iwaki America is at-will, which means that your employment can be terminated by either you or Iwaki America at any time, with or without any cause or reason and with or without any advance notice.

The policies, procedures and benefits described in the guidelines may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.

We believe that each employee plays a vital role in the success of our company. We look forward to working with you and extend our best wishes for your personal success at Iwaki America.

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IWAKI AMERICA MISSION STATEMENT

It is Iwaki America's mission to create value for our customers in the global fluid control and treatment markets through the innovative integration of our advanced sensing, monitoring, control, chemical, fluid handling and communications technologies and the effective application of these integrated solutions to their needs.

Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Iwaki America will be based on merit, qualifications, and abilities. Iwaki America does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, sexual orientation, national origin, age, disability, or any other characteristic protected by law.

Iwaki America will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of Human Resources. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Open Door Policy

Iwaki America promotes an atmosphere whereby employees can talk freely with members of the management staff. Employees are encouraged to openly discuss with their supervisor any problems so appropriate action may be taken. If the supervisor cannot be of assistance, Human Resources is available for consultation and guidance. Iwaki America is interested in the success and happiness of all our employees. We, therefore, welcome the opportunity to help employees whenever feasible.

Mandatory Federal Tax Withholding on Supplemental Wages

Some policies in this Handbook make reference to **corporate** provisions within federal and state tax laws, rules and regulations. These same tax laws, rules and regulations include related **individual** provisions that you, as an employee, should be knowledgeable about and plan for. This Handbook does not address these individual provisions. You should consult with a tax professional to review your individual circumstances and decide what plans or actions are best for you. Keep in mind that state tax regimes can vary a lot from state to state.

Hours of Work

Work schedules are arranged according to job function and departmental need with the guidance and approval of one's supervisor. Non-exempt full-time employees are scheduled for an eight-hour weekday work period interrupted by a 30-minute unpaid lunchtime break. Exempt employees are entitled to a 60-minute lunchtime break. The normal hours for full-time office employees will be 8:00am-5:00pm, and for manufacturing employees 7:30am-4:00pm. Should you have a situation whereby you need a temporary change to your work hours, please see your manager for a written accommodation. All special circumstances will need to be approved by a Director of the Company. In addition, Iwaki America provides all full-time employees with two paid 15-minute break periods each day, one in the morning and one in the afternoon. Employees working less than 40 hours per week receive one 15-minute break. If you arrive more than one hour after your morning start time or depart more than one hour before your afternoon end time, you will forfeit the respective break period. Employees may not leave the premises during break periods unless they've received specific approval from their Supervisor. All overtime for non-exempt employees must be pre-approved by their supervisor.

Time Clock Guidelines

Non-exempt Manufacturing/Warehouse employees will utilize a time clock. This is the official time record for employee compensation. See your Supervisor for procedures.

Guidelines and Time Calculations:

- Every manufacturing/warehouse employee has assigned working hours. Employees are expected to be in their work area and ready for work at their start time and remain in their work area until the scheduled end time.
- We expect you to "swipe-in" before your start time and "swipe-out" after your finish time. If you swipe in after the scheduled start times or before scheduled end times, you will be docked for the missed time.
- You will not be paid if you do not swipe-in or swipe-out with your card. Missing more than three swipes per month is grounds for disciplinary action.
- Employee lunches scheduled for one hour will only be counted as a regular ½ hour lunch
- Overtime will be paid only when overtime has been authorized. OT is paid in 15-minute increments (e.g. if you arrive at 6:11 am, you will be paid starting at 6:15 am)
- Any deviation from the assigned working hours **MUST** be approved in advance by your supervisor.
- Continual and/or repeat deviations from assigned working hours will be grounds for disciplinary action.
- It is not acceptable to "swipe-in/out" for another employee. Falsification of records or documents is a violation of company policy and will result in both employees receiving disciplinary action in accordance with company policy. The first offense will result in suspension. Future offenses will result in termination.

Attendance

To maintain a safe and productive work environment, Iwaki America expects employees to be reliable and punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on Iwaki America. Foreseen absence or lateness should be discussed with one's supervisor prior to the absence. Unforeseen absence or lateness should be reported by phone to the supervisor and/or Human Resources no later than 8:30 a.m. that day.

Poor attendance and excessive tardiness are disruptive. Either may lead to disciplinary action, up to and including termination of employment. Employees who fail to report an absence for three (3) consecutive days may be terminated and considered to have voluntarily quit. Any unreported absence within the first ten (10) days of employment may be considered a voluntary quit.

Safety

Iwaki America is firmly committed to the safety of our employees. We will do everything possible to prevent workplace accidents and we are committed to providing a safe and smoke-free working environment for all employees.

We value our employees not only as employees but also as human beings critical to the success of their family, the local community, and Iwaki America.

The wearing of protective clothing, goggles and other safety precautions specific to particular job functions must be the highest priority. The safe way is the only right way. Please refer to the Safety Handbook for further information.

Employees are encouraged to report any unsafe work practices or safety hazards encountered on the job. All accidents/incidents (no matter how slight) are to be immediately reported to the supervisor on duty. Please refer to the Safety Handbook for further details.

Employment Classification

Regular Full-Time employees are those who are not in a temporary status and who are regularly scheduled to work Iwaki America's full-time schedule.

Regular Part-Time employees are those who are not assigned to a temporary status and who are regularly scheduled to work less than the full-time work schedule, but at least 30 hours per week. Regular part-time employees are eligible for benefits sponsored by Iwaki America, subject to terms, conditions, and limitations of each benefit program. These employees are eligible to receive pro-rated personal leave and holiday pay based on the part-time employee's hours as a percentage of a 40-hour work week. Examples of how part time employees accrue holiday time:

1. If the employee works 30 hours per week, he/she will receive 6 hours of holiday pay for company holidays.
2. If the employee works 32 hours per week, he/she will receive 6.4 hours of holiday pay for company holidays.

If your regular work schedule is 4 days per week, he/she will be permitted to work 4 days during a week of a Holiday. You will be paid your regular pay vs pro-rated Holiday pay. Example:

1. If you regularly work Monday-Thursday and there is a Friday Holiday, you can choose to work Monday-Thursday and receive your regular pay vs pro-rated Holiday pay.

Permanent Part-Time employees are those who are not assigned to a temporary status and who are regularly scheduled to work less than 30 hours per week. While they do receive all legally mandated benefits (such as Social Security and workers' compensation insurance), they are ineligible for all of Iwaki America's other benefit programs with the exception of the 401(k) plans. They are eligible to receive pro-rated personal leave and holiday pay.

Temporary Full-Time or Temporary Part-Time are those in a position established for a specific period of time or for the duration of a specific project or group of projects. While they do receive all legally mandated benefits, they are ineligible for all of Iwaki America's other benefit programs.

Co-ops (Interns) or Seasonal Employees are those in a position established for a specific period of time or for the duration of a specific project or group of projects. While they do receive all legally mandated benefits, they are ineligible for all of Iwaki America's other benefit programs.

Non-exempt employees, full or part-time, whose employment is subject to the Federal Fair Labor Standards Act are entitled to overtime pay.

Exempt employees, full or part-time, whose major job function is executive, administrative, professional, or outside sales as defined by the Federal Fair Labor Standards Act are excluded from overtime pay.

Access to Personnel Files

Employee personnel records are maintained through the Human Resources department. These files are regarded as highly confidential. Managers may only have access to personnel file contents on a need-to-know basis. Employees may review the contents of his/her personnel file during office hours and in the presence of the Human Resource department. All requests for access to your personnel file must be provided in writing to Human Resources. This form can be found on the HR Intranet or in the HR office. Personnel file access upon request will generally be permitted within 3 days of the request.

Maintenance of Personnel Files

Keeping your personnel file up-to-date is important with regard to pay, deductions, benefits and other matters. Coverage or benefits that you and your family may receive under the Company's benefits package could be negatively affected if the updated information is not provided to Human Resources. If you have a change in any of the following items, please notify HR as soon as possible:

- Legal name
- Home address
- Telephone Number
- Person to call in case of emergency

- Marital or domestic partnership status
- Change of beneficiary
- Number of dependents for tax withholding purposes
- Completion of education courses and program

Dress Code

The dress code Monday through Thursday is business casual for all office employees (no blue denim jeans). Fridays or the day before a Holiday are casual dress (blue denim jeans without holes, frays, etc. are permitted). A basic essential of appropriate dress includes clothing that is neat and clean.

Employee Conduct and Work Rules

To ensure orderly operations and provide the best possible work environment, Iwaki America expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment:

- Theft or inappropriate removal or possession of property
- Falsification of timekeeping records
- Working under the influence of alcohol or illegal drugs
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
- Fighting or threatening violence in the workplace
- Boisterous or disruptive activity in the workplace
- Negligence or improper conduct leading to damage of employee-owned, employer-owned or customer-owned property
- Insubordination or other disrespectful conduct
- Immoral or indecent conduct on company property
- Habitual tardiness
- Violation of safety or health rules
- Smoking in prohibited areas
- Obscene or abusive language directed toward any other person or persons while on duty or on company premises
- Sexual or other unlawful or unwelcome harassment
- Abuse, misuse or intentional destruction of company or associate property
- Falsification of company records and company information
- Implied or actual harm to any associate while on company property
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Excessive absenteeism or any absence without notice
- Unauthorized absence from workstation during the workday

- Unauthorized use of telephones, mail system, or other employer-owned equipment
- Unauthorized disclosure of business “secrets” or confidential information
- Violation of personnel policies
- Tampering with another associate’s time records
- Refusal to complete assigned tasks or walking off the job without approval of immediate Supervisor
- Sleeping while on duty
- Refusal to submit to a medically approved drug/alcohol test by any associate suspected to be under the influence of such substances

Drug-Free Workplace

It is Iwaki America’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.

While on Iwaki America premises no employee may use, possess, distribute, sell, or be under the influence of alcohol, marijuana or illegal 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.

Any employee under the influence of alcohol, marijuana or drugs which may impair judgment, performance or the safety of the employee or others while on Iwaki America’s property, company business, or during work hours, is subject to discipline up to and including immediate termination and/or required participation in a substance abuse rehabilitation or treatment program. An employee reporting that another employee is under the influence of alcohol, marijuana or drugs will not be discriminated against or discharged from employment. In order to require post-incident drug testing there must be a reasonable possibility that drug, or alcohol use was a contributing factor to the reported injury or illness. An employee who refuses to consent and submit to a test when requested will be subject to disciplinary action, up to and including termination, pursuant to the company’s discipline and dismissal procedures.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of, disciplinary action may request approval to take unpaid time off to participate in a rehabilitation or treatment program through Iwaki America’s health insurance benefit coverage. Leave may be granted if the employee agrees to abstain from use of the problem substance; abides by all Iwaki America policies, rules, and prohibitions relating to conduct in the workplace; and if granting the leave will not cause Iwaki America any undue hardship.

In order to ensure a safe working environment, Iwaki America may conduct drug and/or alcohol testing if an employee is displaying behavior that may be alcohol or drug related.

Food in Manufacturing

Production employees may store food in company refrigerators. There is no food allowed in the manufacturing areas to ensure safety and quality control of our products.

Electrostatic Discharge (ESD) Program in Manufacturing

ESD protective areas on the manufacturing floor are restricted areas. Only employees who receive ESD training are allowed to enter or work in these areas. It is the responsibility of everyone who enters an ESD Protective Area to adhere to this requirement. ESD protective areas are identified on the production floor with signage and or caution tape to identify the area as ESD sensitive. Untrained individuals including visitors must be escorted by trained personnel while in an ESD protective area.

Pets at Work

Employees may bring pets to work occasionally. However, this benefit may not be appropriate for all job functions and requires approval from your Manager. Each employee will be responsible for his or her pet at all times while on company premises. Any display of aggressive behavior will require the employee to remove the pet from the premises. Employees will be held fully responsible for any damage that is done to the property or fellow employees. When a visitor announcement is sent to employees, the period of time the visitors are on the premises will be pet free.

Children at Work

Occasional family visits are welcome (example: new baby) - no routine visits. While children are in the workplace, they must be directly supervised by the parent at all times. Children are not permitted in the manufacturing or warehouse areas due to insurance regulations. Employees are not permitted to bring ill children to work - employees are provided paid time off benefits which should be used for personal reasons or to care for an ill child. When a visitor announcement is sent to employees, the period of time the visitors are on the premises will be children free.

Music/Headphones

If employees are stationary in their assigned area and not moving about the production floor, he/she will be permitted to wear one earbud.

Cellphone/Texting

Employees need to notify their Lead or Manager immediately if there are extenuating circumstances which need to be addressed during the workday for which he/she needs to use their cellphone. Other than these instances, there should be no calls or texts during the actual working hours (except for breaks and lunch time).

Freebies/Gifts

All gifts/tickets, (non-consumables) etc. received by employees from suppliers or contractors must be used for company events or raffled off to employees.

Company Phone Use

The phone system is vital to serving our customers. Because a large percentage of our business is conducted over the phone, it is essential to project a professional telephone manner at all times. Although Iwaki America realizes that there are times when an employee may need to use the telephone for personal reasons, it is expected that good judgment will be used in limiting the length and frequency of such calls. Phone use for personal calls should be limited to scheduled non-work periods and only when absolutely necessary.

Weather or Other Unforeseen Events:

Unless you have scheduled PTO, early dismissals from work for severe weather or other unforeseen events are a corporate-level decision.

Management may invoke a schedule if there is severe weather or other unforeseen events.

- Delayed Opening: Start time may be delayed due to severe weather or other unforeseen events.
Early Closing: If weather conditions deteriorate during the day, an early close time may be announced.
Cancellation: If weather conditions are too severe the workday may be cancelled.

If the building is closed, the greeting on the main phone line will be changed. Therefore, employees should call the main phone number at 508-429-1110 if there is any question about whether or not the building is open.

In the event that the building is closed for business due to severe weather or other unforeseen events, you will be paid for regularly scheduled work hours missed during the closure.

If the building is open and you choose not to report for regularly scheduled work due to concerns about travel in adverse weather, you will be charged for a full day against your accrued paid time off (PTO), even if the building closes early.

Hiring of Relatives

Relatives of current employees may be hired only if they do not work in the same department or work directly for or supervise a relative. This applies to hiring permanent employees only. Iwaki America reserves the right to use its discretion in hiring and placing the relatives of its employees in a manner calculated to eliminate potential conflicts of interest.

Performance Management

Iwaki America's Performance Appraisal process is designed to evaluate and document employee job performance. This tool provides us with an opportunity to improve Human Resource decisions (e.g., merit increases, promotions, transfers, etc.) and to improve communications between management and the employee. This tool also aids us in determining training and educational needs, improve performance, set goals, and more fully develop the employee and our organization. Competency skills will be evaluated, at a minimum, at your annual review or at other times during the year.

Procedure

Each employee's performance is reviewed and documented on a performance appraisal form at least annually. This performance appraisal form can be found in the HR section on Iwaki America's Intranet website. Each supervisor is responsible for providing feedback on job performance, establishing job performance goals for the coming appraisal period, and addressing individual development and career needs and goals.

Human Resources initiates the performance appraisal process by distributing information and appropriate forms to supervisory personnel along with a schedule for completion and submission of the required information.

Poor job performance may result in disciplinary action up to and including termination. Once all management approvals are received, performance appraisals are filed in each employee's personnel file. During the year, supervisors and employees are encouraged to meet for interim performance reviews for coaching and feedback purposes.

Annual increases will be effective the first full week in May.

Performance Management Progressive Problem Solving

Iwaki America believes that you want to, and will, do a good job when you know what is required to perform your job properly. Your Supervisor is responsible for ensuring that you know what is expected of you in your job. Further, it is company policy that employees are given ample opportunity to improve in their job performance. The purpose of this process is to present a planned method of improving employee performance.

Progressive problem-solving means that these steps will normally be followed: verbal warning, written warning, final written warning or termination of employment. Iwaki America reserves the right to bypass one or more of these steps if deemed necessary.

Job Opportunity Program

In general, available jobs will be posted on company bulletin boards for five (5) working days. Any employee wishing to apply for a posted position must complete and return a Job Posting Application (located on the Intranet). Candidates who meet the qualifications will be interviewed by the hiring manager. At the completion of the interview process, the immediate supervisor and Human Resources department will select the final candidate.

Workplace Injury

In the event of injury at work, employees should report the incident immediately regardless of the degree of severity. All injuries should be reported. Supervisors must complete accident reports as soon as possible and submit the reports to the HR office. An employee reporting that another employee is under the influence of alcohol, marijuana or drugs will not be discriminated against or discharged from employment. In order to require post-incident drug testing there must be a reasonable possibility that drug, or alcohol use was a contributing factor to the reported injury or illness. An employee who refuses to consent and submit to a test when requested will be subject to disciplinary action, up to and including termination, pursuant to the company's discipline and dismissal procedures.

In the event of severe injury or illness, the emergency phone number "911" should be called from the nearest phone. After the call for emergency services has been made, the switchboard should be notified. If an event takes place that incapacitates an employee, 911 will be called immediately.

For minor injuries, eye wash stations and first aid cabinets are located on the production floors (330 Hopping Brook and 5 Boynton). First aid cabinets are also located in the kitchen, and office space near accounting at 5 Boynton Road.

Workers' Compensation

If you experience a work-related injury or illness, you may apply for Workers' Compensation benefits through Iwaki America. You must immediately report your injury regardless of the degree of severity. An illness should be reported within 24 hours of becoming aware of the illness. Supervisors must complete accident reports as soon as possible and submit the reports to the HR office. Employees will use their Paid Time Off (PTO) for the required 5 working day waiting period. Employees may also use their accrued Paid Time Off (PTO) to supplement their Workers' Compensation benefits during medical leave. Employees eligible for Family Medical Leave (FMLA) will have their Workers' Compensation absence count towards their FMLA leave allotment.

Your Pay

Paychecks and Direct Deposit

All non-exempt, non-production employees are to complete a weekly timesheet. The Supervisor will review, sign and then deliver the timesheet to Accounting no later than 9:00 a.m. each Monday morning.

Paychecks are distributed on Thursday. If a holiday falls on Thursday, checks will be distributed on Wednesday.

Employees may choose to have all, or a portion of their pay directly deposited to their bank in one or more accounts. Contact Human Resources for details and appropriate forms.

ADP is the payroll provider for Iwaki America. In order to view your payroll information and utilize the employee self-service features, etc. you will need to register on their website. The website is <https://workforcenow.adp.com> and the company registration code is WALCCORP-IPAY (case sensitive).

Overtime

Depending on Iwaki America's work needs and commitment to customers, employees will be required to work overtime when requested to do so. Overtime rates of 1½ times hourly rates will be paid to non-exempt employees for all time worked in excess of forty (40) hours in any one work week.

Non-exempt employees that work during a week with a Holiday will be paid for all hours worked that exceeds 40 hours at a rate of 1 ½ times hourly rate. Holidays will be considered hours worked.

Non-exempt employees working OT on Saturdays will be provided one 15-minute break for working up to 6 hours, or two 15-minute breaks for working 8 - 12 hours. When working over 6 hours, employees must take a 30-minute unpaid lunch period.

Prior approval of your supervisor is required before any non-exempt employee works overtime. Someone from the management team must be in the building during OT (Manager, Lead, Production Planner, etc.).

FLSA provisions for Exempt Employee

If you believe that an improper deduction has been made to your salary, you should immediately report this information to your direct supervisor, or to Human Resources.

Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, you will be promptly reimbursed for any improper deduction made.

Resignation

If you wish to terminate employment you are requested to give at least two (2) weeks' notice of resignation in writing to your Supervisor.

If you wish to resign your position, you are encouraged to discuss the matter with your Supervisor and attempt to achieve a mutually agreed upon separation date.

Prior to an employee's departure, an exit interview will be scheduled to discuss the reasons for resignation and the effect of the resignation on benefits.

Electronic Media Policy

Iwaki America's policy addresses employees' acceptable uses of:

- Electronic mail
- Internet access
- Voice mail
- Any other electronic media and equipment, including Iwaki America's computer network system - (collectively, "Electronic Media Systems").

As with any policy, Iwaki America reserves the right to change this policy at any time.

Purpose

Iwaki America's Electronic Media Systems are business tools that are provided by Iwaki America to employees to facilitate the timely and efficient conduct of business.

The Companies Right to Monitor

Iwaki America reserves and intends to exercise the right to review, audit, intercept, access and/or disclose messages or material, including attachments, created, received or sent, web sites visited and/or files downloaded over Iwaki America's electronic mail or Internet systems. Authorized representatives of Iwaki America may monitor the use of its systems in its sole discretion, at any time, with or without notice to any employee and may bypass any pass code. Such monitoring is capable of tracking and recording e-mail messages sent and received as well as Internet websites visited by employees. The confidentiality of any message or material -- even if password protected -- should not be assumed. Even when a message or material is erased, it may still be possible to

retrieve and read that message or material. The use of passwords for security does not guarantee confidentiality.

The use of the Electronic Media Systems is reserved primarily for the conduct of company business. Limited personal use of the Electronic Media Systems is permitted, provided it is not excessive and does not interfere with the business needs, environment or normal operations of Iwaki America and does not violate any Invention, Confidentiality and Non-compete Agreement obligations Employees have to Iwaki America, any other Company policies, or the law.

Company Property

The Electronic Media Systems and all related hardware are Iwaki America's property. Additionally, (i) messages and attachments composed, sent or received on the electronic mail, voice mail, or Internet systems; and (ii) files placed on Iwaki America's computer network, including those that may be password protected, are all the property of Iwaki America and remain property of Iwaki America, even upon an employee's resignation or termination. They are not the private property of any employee, and employees should not consider any material placed on or passing through any Electronic Media Systems, including e-mail, voice mail, or Internet messages, private material or their personal possessions.

Offensive, Disparaging or Harassing Use Prohibited

The Electronic Media Systems, including electronic mail, voice mail, and Internet systems, are not to be used to create any offensive or disruptive messages. Among those which are considered offensive for purposes of this policy are messages or materials which contain sexual implications, racial or ethnic slurs, or other comments that offensively address someone's age, sex, sexual orientation, religion, national origin, ancestry or disability. In addition, the Electronic Media Systems must not be used to communicate other improper messages, for example, messages or materials that are defamatory, derogatory, disparaging, obscene, harassing, or otherwise inappropriate, concerning any subject matter, including, without limitation, coworkers, officers or directors of Iwaki America, or Iwaki America itself. The Electronic Media Systems must not be used to commit any crime, including but not limited to sending obscene e-mails over the Internet with the intent to annoy, abuse, threaten, or harass another person.

No Sexually Explicit Sites or Communications

Iwaki America's Internet system must not be used to visit sexually explicit or otherwise offensive or inappropriate Web sites, or to send, display, download or print (i) offensive material, (ii) pornographic or sexually explicit pictures or text, or (iii) any other materials which may be found offensive by most reasonable people.

Viruses

Employees may not use Iwaki America's e-mail or Internet systems to develop or send any virus or otherwise destructive program.

Copyrighted Material and Trade Secrets

The electronic mail and Internet systems must not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar material without prior management written authorization.

Treatment of Other Employees' Files, Documents or Transmissions

Notwithstanding Iwaki America's right to retrieve and read any files, documents or transmissions on Iwaki America's Electronic Media Systems, including electronic mail, voice mail, or Internet messages or material, employees should treat such material of other employees as confidential. Employees should access only such files, documents or transmissions on Iwaki America's Electronic Media Systems for which they are the intended recipient or operator. Nothing in this provision should create any expectation of privacy in any materials contained on the Electronic Media Systems of Iwaki America.

Contact Person

Employees who need help understanding this policy or who discover a violation of this policy may notify the Human Resources Department. Where appropriate, employees who discover a violation of this policy should follow Iwaki America's harassment, including sexual harassment, complaint procedures.

Company Confidentiality and Encryption

Confidential or privileged information of Iwaki America should not be posted on or sent over the Internet or in e-mails, unless: (i) necessary and in the performance of an employee's job responsibilities; (ii) sent with appropriate warnings, safeguards or encryption; and (iii) the employee obtains prior written management authorization. Only Iwaki America approved encryption methods may be used and then only by authorized employees.

No Use in Violation of Invention, Confidentiality and Non-compete Agreement

The Electronic Media Systems of Iwaki America are never to be used in any way that violates an employee's Invention, Confidentiality and Non-Compete Agreement.

Other Countries' Laws

Employees with Internet access must take particular care to comply with and understand the copyright trademark, libel, slander and public speech control laws of those countries in which this Company maintains a business presence.

Representation of Company

In their use of Iwaki America's Electronic Media Systems, Employees must never exceed the scope of their job responsibilities or authority in any of Iwaki America's representations.

Disciplinary Action

A violation of any provision of this policy may result in disciplinary action, up to and including termination from employment.

As a reminder the following is not acceptable usage for our networks:

- Streaming audio/video (Pandora, iTunes, YouTube, NetFlix, various news sites, etc.)
- Downloading of pirated or personal software/music/videos from any site (torrents, etc.)
- Storage of non-work-related information (music, videos, etc...) on any computer or server. At their discretion, the IT department will remove these files. Also, IT is not

responsible for providing backups of these files if a computer needs to be repaired or replaced.

- Installing unapproved, unlicensed (pirated), or non-work-related software on any computer.
- Using company system for personal use. Use Gmail, yahoo, Hotmail, etc.
- Other traffic intensive programs: Screen savers which download images from the internet, weather, stocks, and news “ticker” programs.
- Use of software or web services which attempt to circumvent the content filters or firewall.

Other guidelines:

- When sharing files with other people within IA, do not email the file as an attachment, instead email a link to the file on the server.
- When sharing large files with people outside of IA, use a file sharing site such as Google Drive, TransferBigFiles.com, etc.
- Except for Wise, do not leave browser windows continuously open. Many web sites constantly update, causing unnecessary traffic.

Data Security Policy

At Iwaki America Inc., (the “Company”), we are sensitive to the need to protect the security and confidentiality of the Personal Information of our employees contained in our business records. It is our policy that the Personal Information of any of our employees contained in our records is limited to what is reasonably necessary to accomplish legitimate business purposes, and to comply fully with state and federal legal requirements. Our objective in the development and implementation of this comprehensive written Information security program (the “Program”) is to create effective administrative, technical and physical safeguards for the protection of Personal Information and to comply with our obligations under 201 CMR 17.00.

For the purposes of this Program, “Personal Information” means a person’s first name and last name, or first initial and last name, in combination with any one or more of the following data elements that relate to such resident:

- Social Security number
- Driver’s License number or state issued identification card number
- Financial account number, or credit/debit card number with or without any required security code, access code, personal identification number or password, that would permit access to a resident’s financial account

“Personal Information” does NOT include information that is lawfully obtained from publicly available information or from federal, state, or local government records lawfully made available to the general public.

Purpose and Scope

The purpose of this Program is to establish administrative, technical and physical safeguards to protect Personal Information that is owned, licensed, stored, or maintained by the Company, whether such information is contained in paper or electronic records or in any other form. This Program is designed to ensure the security and confidentiality of Personal Information, to protect against anticipated threats or hazards to the security or integrity of Personal Information, and to protect against unauthorized access to or use of Personal Information in a manner that creates a substantial risk of identity theft or fraud.

Administration of Information Security Program

- The Company's Human Resource Director will be the "Information Security Coordinator" (ISC) for this Program.
- Responsibilities of ISC:
 - Develop, implement, administer, monitor, review and update this Program from time to time, consistent with the requirements of the Regulation. This includes review of the scope of the security measures at least annually or whenever there is a material change in business practices that may reasonably implicate the security or integrity of records containing Personal Information.
 - Oversee ongoing employee training and any communications involving this Program
 - Address any information security issues, including employee compliance and access to the Company's Personal Information by former employees, that may arise from time to time, and provide input to the Company regarding the imposition of disciplinary measures for violations of the Program
 - Take all reasonable steps to select and retain third-party service providers that are capable of maintaining appropriate security measures to protect such Personal Information consistent with these regulations and any applicable state and federal requirements.
 - Require contractual agreements from third-party service providers that any third-party service provider with access to the Company's Personal Information has the capacity to protect such Personal Information in the manner consistent with this Program and the requirements of the Regulations and that any such third-party service provider applies protective security measures at least as stringent as those required by the Regulations.
 - The ISC will review incidents of possible or actual breaches and when appropriate will convene a team of employees to form an incident response task force to

- determine appropriate responses when a breach occurs. The ISC will document all breaches and subsequent responsive actions taken. Records of breaches will be retained in a file in the office of the ISC.

Risk Assessment

The ISC, along with other appropriate employees, has identified and shall continue to identify the reasonably foreseeable internal and external risks to the security, confidentiality and integrity of Personal Information that could result in unauthorized access to or disclosure, misuse, alteration, destruction, or other compromise of such information. Among the foreseeable risks are inadvertent destruction, employee misuse of access and external hacks.

Under the direction and supervision of the ISC, the Company shall, on an ongoing basis, review internal and external security risks, and evaluate the effectiveness of and recommend improvements to the Company's Program.

Compliance with the Program

All employees (whether full time, part time, seasonal or temporary) are subject to the applicable requirements set forth in the Program.

Employees are required to report any suspicious or unauthorized use of Personal Information to the ISC. Failure to report any such actual or suspected unauthorized access, possession or use of Personal Information when such becomes known to an employee or reasonably should be known, may lead to disciplinary action, up to and including suspension and/or termination.

It is unlawful and against our policy to retaliate against anyone who reports a violation of this Program or who cooperates in an investigation regarding non-compliance with this Program. Any such retaliation will result in disciplinary action by the Company, up to and including termination of employment.

Record Retention

The Company only collects and maintains records and files containing Personal Information of the type, and for the length of time, reasonably necessary to accomplish the Company's legitimate business purpose, or as otherwise necessary for the Company to comply with other local, state or federal requirements. The Company periodically reviews its records, files and form documents to ensure that the Company is not gathering or retaining Personal Information unless there is a compelling reason to do so.

All employees, contractors or consultants are required upon termination or resignation for any reason, or earlier, if upon request of the Company or the ISC, to return or destroy all records and files containing Personal Information of current or former employees or other service providers of the Company, in any form that may at the time of such termination be in their possession or control, including all such information stored on laptops, portable devices (such as thumb drives, zip drives, CDs, DVDs, cell phones or blackberries) or other media, or in files, records, notes or papers.

Handling of Personal Information

Personal Information must be created, stored, disclosed, transmitted and disposed of in the following manner:

- **STORAGE:** Paper documents containing Personal Information must be stored in a locked or otherwise secured desk, file cabinet, office or controlled area when unattended. All Employees are prohibited from storing Personal Information on Company laptops, portable devices (ie. thumb drives, zip drives, CDs, DVDs, cell phones or blackberries) or other media, or in files, records, notes or papers. If you have a need to store Personal Information via the above-mentioned devices, you must speak to the ISC to determine an alternate method.
- **ACCESS:** Access to Personal Information in our business records such as names, Social Security numbers, driver's license information and any financial account information is strictly limited to those persons who are required to know such information to perform the functions of their job. Generally, this means the Human Resource Director, Executives, certain IT personnel, and General Accountant. Certain agents of and service providers to the Company will be given this information but only to the extent necessary for the Company to carry out its responsibilities (e.g. 401(k) provider, health care providers and insurers, our bank for direct deposit transfers, etc).
- **TRANSMISSION:** All employees are prohibited from transmitting unencrypted Personal Information via email or the internet on Company laptops, portable devices (i.e. thumb drives, zip drives, CD's, DVDs, cell phones or blackberries) or other media. If you need to transmit Personal Information via email or the internet you must consult with the IT Director for alternative methods. Voice communication involving Personal Information must be kept to a minimum and performed in closed or secured locations. Transmission of Personal Information in paper or hard copy from outside the Company, or other removal of Personal Information from the premises, must be done with reasonable precaution to ensure the security of such information and to prevent unauthorized disclosure.

Employees may not use fax machines for communicating Personal Information unless additional controls are in place to protect the information from unauthorized access or acquisition. For example, ensuring that (i) the recipient's number is correct, and (ii) the recipient is standing by the fax machine waiting to pick up the hard copy.

- **DISPOSAL:** Personal Information must be disposed of when no longer needed by the Company. Where appropriate, paper documents and other hard copies of records or files containing Personal Information determined by the Company as no longer needed should be disposed of by cross-cut shredding so that Personal Information cannot practicably be read or reconstructed. Electronic Personal Information determined by the Company as no longer needed must be destroyed or erased so that Personal Information cannot be read or reconstructed.

Physical and Environmental Controls

- Use and Storage of Files: Employees, contractors or consultants must not keep open documents or files containing Personal Information on their desks when they are not at their desks or in any other unsecured or unattended place. This policy applies to both hard copies and electronic copies of records and files containing Personal Information. At the end of the workday, all filed and other records containing Personal Information must be secured in a manner consistent with this Program and the requirements of the Regulation.
- Blocked Physical Access: The Company prohibits and blocks physical access to records and files containing Personal Information by any individual without authorization to access such records as follows:
 - Only the ISC has physical access to the paper and other hard copies of records containing Personal Information
 - Only the ISC, IT Director and General Accountant have access to the electronic files containing Personal Information

Employees, contractors and consultants are required, upon termination or resignation for any reason, or earlier if upon the request of the Company or the ISC, to surrender all keys, IDs, access codes, badges, business cards and the like that permit access to the Company's premises or to records of the Company containing Personal Information.

- Visitors: Visitors to the Company are prohibited and blocked from accessing any records or files of the Company containing Personal Information.

IT Policies and Procedures

Electronic Access

- The Company has in place secure user authentication protocols, including control of User IDs and other identifiers, a reasonably secure method of assigning passwords, and control of data security passwords to ensure that such passwords are kept in a location and/or format that does not compromise the security of the data they protect
- The Company assigns unique identifications plus passwords that are re-designed to maintain the integrity of the security of the access controls and prohibits the use of vendor supplied default passwords to each authorized active user.
- The Company will block access to user identification after multiple unsuccessful attempts to gain access.
- The Company restricts access to authorized users and active user accounts only. Such restrictions allow access to records and files containing Personal Information only to users with a need to access such Personal Information in order to perform their job duties.

IT Security Policies

The Company has reasonably up-to-date firewall protection, operating system security patches, and system security agent software designed to maintain the integrity of the Personal Information. The system security agent software includes malware protection and up-to-date patches and virus definitions installed on all systems processing Personal Information.

Employee's user-IDs and passwords must be changed periodically. Access to electronically stored Personal Information shall be limited at all times to those few employees on a need-to-know basis who shall be assigned a unique log-in ID. Re-log-in is required if you have Personal Information on your computer and the computer is not in use for more than a few minutes. All computer systems and devices used to store, or access employee Personal Information are routinely monitored for unauthorized use, possession, or access. Violations of this policy may result in disciplinary action up to and including suspension or termination.

Effective Date

The Data Security Policy effective date is March 1, 2010.

The Company will review this Program at least annually and reserves the right to change, modify, or otherwise alter this Program at its sole discretion and at any time as it deems circumstances warrant.

Telecommuting Guidelines

Iwaki America may allow employees to temporarily work from home to ensure business continuity, on a case-by-case basis.

Managers will discuss the job responsibilities and determine if the job is appropriate for a telecommuting arrangement. If your position requires physical presence in the Holliston office(s) you will not be allowed to telecommute. If your position is approved to telecommute, the manager and employee will ensure that the employee has appropriate equipment needs such as hardware, software, phone, etc. The IT department is available to review these equipment needs with employees and to provide support to employees.

The employee agrees that they have an appropriate work environment within his or her home for work purposes. Iwaki America will not be responsible for costs associated with any setup of the employee's home office.

Consistent with Iwaki America's expectations of information security for employees working at the office, telecommuting employees will be expected to ensure the protection of proprietary company and customer information accessible from their home office.

Iwaki America may require employees to return to regular, in-office work at any time.

A Telecommuting Agreement will need to be signed by the employee and his or her manager.

New England Patriots Ticket Policy

Every year, the Company receives an allocation of New England Patriot tickets. The allocation may be for one game or at times it may be for up to all eight home games. The policy below will give guidance as to how the tickets are to be handled.

1. The tickets will first be available for Corporate use and any remaining tickets will be available for sale at face value. The employees will be notified as to which games, how many tickets per game and cost per ticket are available for sale. Employees have one

week to inform Leann Benaski as to what game(s) they are interested in and how many tickets. Leann will compile all the ticket requests. Assuming there are more requests than tickets for a particular game, either a lottery method or a method that takes into consideration who hasn't been to a game in the longest period will be used to determine who will get the tickets. Once it has been decided who gets the tickets, Leann will notify the employees and they have 2 weeks to pay in full for the tickets. Checks are to be made out to Iwaki America, Inc.

2. Then, if there are any unsold tickets, the employees will be notified as to which games and how many tickets per game are available for free. Employees have one week to inform Leann Benaski as to what game(s) they are interested in and how many tickets. Leann will compile all the ticket requests. Assuming there are more requests than tickets for a particular game, either a lottery method or a method that takes into consideration who hasn't been to a game in the longest period will be used to determine who will be awarded the tickets. Once it has been decided who gets the tickets, Leann will notify the employees.

NOTE: As these are Company season tickets, tickets should only be used by employees and/or trusting relatives. The Patriots have cracked down recently on patrons who do not act accordingly, and we do not want to lose all the season tickets due to one bad apple. That would be very bad for the Company and YOU! Also, tickets are not to be resold. If you have tickets that cannot be used, please return them to Leann, and if you bought them, your money will be refunded.

Pre-employment Assessment

To ensure that individuals who join Iwaki America are well qualified and have a strong potential to be productive and successful, and to further ensure that we maintain a safe and productive work environment that is free of any form of violence, harassment or misconduct, it is the policy of this company to perform pre-employment assessments on all applicants who are offered and accept an offer of employment.

All pre-employment assessments are conducted by a third party to ensure privacy. All reports are kept strictly confidential and are only viewed by individuals in this firm who have direct responsibility in the hiring process. All assessment reports are kept and maintained separately from your personnel file. If the Company intends to deny employment wholly or partly because of information obtained in a pre-employment assessment, the applicant will first be provided with a copy of the report.

Background Check Policy

Iwaki America, Inc. (Company) believes that hiring qualified individuals contributes to our overall strategic success. The Company may conduct background checks which serve as an important part of the selection process. The information collected helps Iwaki America promote a safe work environment for our current and future employees.

The Company has engaged the services of Creative Services, Inc. (CSI), a Consumer Reporting Agency well experienced and highly respected in the background investigation industry to perform background investigations on behalf of the company. This background investigation

may include appropriate court records relating to the applicant's county of residence for evidence of felony and/or misdemeanor convictions and/or other state-by-state or national criminal databases followed by verifying county searches. Where a criminal record check is part of a general background check for employment, volunteer work, or licensing purposes, the following practices and procedures will generally be followed.

1. Criminal record checks will be conducted in accordance with applicable law. Applicants or employees will be notified if a criminal record check will be conducted and will be asked to complete a Disclosure and Authorization form in accordance with the Fair Credit Reporting Act (FCRA) authorizing the Company to conduct a criminal record search. If requested, the applicant or employee will be provided with a copy of this criminal background check policy.
2. All criminal record check information obtained is confidential and access is limited to those individuals who have a "need to know". This may include, but is not limited to, hiring managers, and staff submitting the background requests, or processing job applications.
3. Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant or employee. Rather, determinations of suitability based on criminal record checks will be made consistent with this policy and any applicable law or regulations.
4. If a criminal record is received, the authorized individual will closely compare the record provided with the information on the Disclosure and Authorization Form, and any other identifying information provided by the applicant or employee, to ensure the record relates to the applicant or employee.
5. If the Company is inclined to make an adverse decision based on the results of the criminal background check, the applicant or employee will be notified immediately. The applicant or employee will be provided with a copy of the criminal record and the FCRA Summary of Rights. The Company will provide the applicant or employee with an opportunity to dispute the accuracy and relevance of the criminal record.

If it is determined the non-conforming result may have some relevance to the individual's ability to perform the duties of the job for which he or she is being considered the company will take the following steps:

- Immediately notify the candidate via a *Pre-Adverse Action Notification Letter*, which will include the following:
 - ◆ Identify the basis for the Adverse Action
 - ◆ A Summary of Your Rights Under the FCRA
 - ◆ A copy of the report that contained the non-conforming result information
 - The company will allow the candidate five (5) business days (ten (10) business days for New York applicants) to respond or dispute the non-conforming results before taking any further action.
6. If the Company reasonably believes the record belongs to the applicant or employee and is accurate, then the Company will determine the applicant or employee's suitability for

the position. Unless otherwise provided by law, factors considered in determining suitability may include, but not be limited to the following:

- a. Relevance of the crime to the position sought;
 - b. The nature of the work to be performed;
 - c. Time since the conviction;
 - d. Age of the candidate at the time of the offense;
 - e. Seriousness and specific circumstances of the offense;
 - f. The number of offenses;
 - g. Whether the applicant has pending charges;
 - h. Any relevant evidence of rehabilitation or lack thereof;
 - i. Any other relevant information, including information submitted by the candidate or requested by the hiring authority
7. The Company will notify the applicant or employee of the decision and the basis of the decision in a timely manner. If the company chooses not to hire the applicant after the aforementioned considerations, the applicant will be provided with an *Adverse Action Notification Letter* which will include the following:
- A copy of the consumer report
 - Summary of Your Rights under the FCRA
8. The company shall comply with State and Federal record retention, destruction and privacy laws.
9. Record Retention and Destruction
- Hard copies must be stored in a locked and secure location
 - The Company will not use “public cloud storage” for storing background check information
 - Background investigation records will be destroyed 7 years after:
 - i. Former employee’s last date of employment; or
 - ii. Final decision with respect to applicant or employee.

Automobile and Truck Policy

This policy applies to employees of Iwaki America Inc. who drive personal vehicles and company-owned trucks on company business.

Iwaki America, Inc. (“Company”) employees will be authorized in writing to use personal vehicles on company business only if the employee first provides a copy of his/her driver’s license, current registration and proof of insurance.

All drivers must complete the Travelers Insurance’s safe driver training program found here: http://travelers.http.internapcdn.net/travelers_vitalstream_com/RiskControl/TR_Cust_WBT_TD/DS_Autos_SUVs_Pickups/story.html

A motor vehicle record (MVR) check will be completed on all employees using vehicles on company business. Any employee receiving a score of “Poor” using the insurance industry standard MVR Evaluation Tool will no longer be authorized to use their personal vehicle on company business.

| Moving Violations (Past 3 years) | PREVENTABLE ACCIDENTS (Past 3 years) | | | |
|-------------------------------------|--------------------------------------|------------|------------|------|
| | 0 | 1 | 2 | 3+ |
| 0 | CLEAR | ACCEPTABLE | BORDERLINE | POOR |
| 1 | ACCEPTABLE | ACCEPTABLE | BORDERLINE | POOR |
| 2 | ACCEPTABLE | BORDERLINE | POOR | POOR |
| 3 | BORDERLINE | POOR | POOR | POOR |
| 4+ | POOR | POOR | POOR | POOR |
| ANY MAJOR Violations (Past 5 years) | POOR | POOR | POOR | POOR |

For employees not receiving a monthly auto allowance, mileage reimbursement will be compensated at the current IRS-approved rate.

Drivers of company-owned trucks must pass the MA DOT physical exam, obtain a DOT medical card and keep this card up to date (bi-annually.)

Drivers must demonstrate safe driving habits and obey all traffic and vehicle safety laws.

The following vehicle safety standards will apply to all employees using personal vehicles and company trucks:

- Drivers are responsible for timely and routine maintenance in accordance with their vehicle's maintenance guide
- All drivers are required to abide by all federal, state and local motor vehicle regulations, laws and ordinances.
- All fines, defense costs and other legal penalties arising out of ticketed offenses are the responsibility of the driver.
- No employee is permitted to consume and/or be under the influence of alcoholic beverages or other drugs (which impair driving ability) while operating a vehicle for company business.
- The driver and all occupants are required to wear safety belts when operating or riding in a vehicle. The driver is responsible to ensure all passengers are wearing their safety belts at all times.
- Only authorized/approved passengers (i.e. those with a defined business relationship) are permitted in the vehicles during the course of business use.
- Drivers shall not pick up hitchhikers.
- Drivers are required to notify their supervisor of any tickets, accidents or other violations they have received while driving.
- Drivers are required to notify their supervisor if their license is suspended or revoked.
- Cell phone use of any kind while driving must be hands-free and should be kept to a minimum. Drivers need to be aware when use of cell phone is creating a distraction from safe driving and adjust their usage accordingly, including pulling off the road to continue/finish the conversation if needed. While driving, attention to the road and safety should always take precedence over conducting business over the phone.

Car Allowance Program

Employees in certain jobs are granted a car allowance as part of their offer of employment. This car allowance is to be used to procure, insure and maintain a late-model vehicle used for business purposes.

Fuel and tolls/toll passes are to be paid separately using the employee's corporate AMEX card. Fuel for personal travel is to be purchased using the employee's personal funds. Insurance coverage must meet the minimums detailed in the Auto Policy.

By law, the employee is responsible for maintaining a detailed record of business and personal mileage. Commuting to the office is personal mileage. This mileage record is to be turned in to the Accounting Department immediately following the end of each year. The value of personal mileage including the personal share of the auto allowance, tolls and fuel will be added to the employee's W-2. Any fuel added to the W-2 amount will be determined by a calculation

comparing total fuel purchases to the value of fuel consumed for business travel using the mileage log, average vehicle MPG and average annual mid-grade fuel cost.

Business Travel

All company travel must be approved by the manager in the employee's department with budget authority for that department. Such approval can be part of a broader-scope action plan.

Employees are responsible for making their own travel arrangements.

Per diem caps on travel expenses including hotels, meals and rental car are difficult to set because costs vary considerably between travel destinations. Absent such caps, it is management's expectation that employees will search for and choose the best value options for all travel-related costs

Employees must file an Expense Report within one week after the close of the month during which the travel occurred and publish a Trip Report within one week of the completion of the travel. By law, the Expense Report must include when and where traveled, companies and key contacts visited, and specific trip objectives achieved. Meals and any entertainment expenses including any such expenses included on hotel invoices must be reported separately from other travel expenses. The Expense Report must be reviewed and approved by the employee's manager prior to payment. Expense reports are subject to further review by both internal and external auditors. The Trip Report should go into more detail on the travel activities and include follow-up action plans.

Employees with corporate AMEX cards are expected to use these cards for business travel. Expense Reports can be done online using the functionality provided by AMEX. Expenses with no clear or supported business purpose will not be approved and will be charged back to employees. Corporate AMEX cards are not to be used for personal purchases. If there is a compelling reason to use the corporate AMEX card for personal purposes, the employee must obtain the approval of his/her manager and repay the personal charge(s) when their next monthly Expense Report is submitted.

For employees who use their personal credit cards for business expenses, the Expense Report form is to be used for reporting and reimbursement. Itemized receipts are required for all charges > \$15. Expenses with no clear and supported business purpose will not be reimbursed.

For employees with corporate AMEX cards, each employee's travel expenses are linked to unique General Ledger accounts, reported separately in the Company's financial statements and scrutinized monthly by the Company's senior management.

Employees with corporate AMEX cards should decline all additional insurance coverages and pre-fueling options when renting a vehicle. Rentals are to be returned with a full tank of gas.

Cellphones – Business Expense

Any employee cell phone expenses charged to the company must be approved in advance by the employee's manager. All U.S. based employees approved for cell phones are expected to obtain

cell phones and cell service on the company's plan (currently with Verizon.) This plan is administered by IT. If an employee is approved to use a different plan, reimbursable expenses are limited to the corporate plan rate.

Corporate Tax Code versus Individual Tax Code

The policies outlined in this handbook are written to comply with **Corporate** Federal and State Tax Code. Individual Tax Code is different than Corporate Tax Code. Individual Tax Code can also vary between the Federal Individual Tax Code and the State Individual Tax Code, along with each state having their own rules. Please consult your tax accountant/preparer with any Individual Tax Code questions and/or issues as the policies noted in this handbook do not address Individual Tax Code.

Harassment Policy

Iwaki America Inc. ("The Company") strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of Iwaki America is characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees should be able to work and learn in a safe yet stimulating atmosphere. The accomplishment of this goal is essential to the mission of Iwaki America. For that reason, the company will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy, the company will seek to prevent, correct and discipline behavior that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. This policy applies to all employees, contractors and temporary workers of the Company. Appropriate disciplinary action will be taken against any worker who violates this policy. Based upon the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

Any conduct based on a person's race, color, religion, gender, national origin, age, disability, or any other characteristic protected by local or federal law is considered harassing if it creates a hostile, intimidating or offensive work environment, or unreasonably interferes with an employee's work performance.

As with sexual harassment, other harassment can be verbal, non-verbal or physical. Examples of what may (if unwelcome and severe or pervasive) constitute other harassment include, but are not limited to, the use of racial or ethnic slurs, jokes, or derogatory remarks; the use of insults, threats, literature, pictures or cartoons based on a protected characteristic; repeatedly asking another employee for money and/or to provide transportation; or any physical aggression based on a protected characteristic.

No individual will be retaliated against or subject to coercion, intimidation, threats or discrimination for making a good faith complaint of sexual or other harassment, opposing sexual or other harassment, or assisting management in an investigation of sexual or other harassment. Any person who retaliates against another for reporting or opposing harassment of any kind will

be subject to disciplinary action, up to and including termination of employment for employees, or permanent removal from the work site for contractors or temporary workers.

This policy applies anywhere employees are functioning on behalf of the Company regardless of whether it is at a Company facility or in a different location.

Sexual Harassment

Sexual harassment in the workplace is unlawful, and it is unlawful to retaliate against an employee for filing a complaint of sexual harassment or for cooperating in an investigation of such a complaint. Iwaki America subscribes to guidelines concerning sexual harassment and has adopted them as Company policy.

Sexual Harassment Policy

It is the goal of Iwaki America, Inc. (The Company) to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace, or in other settings in which employees may find themselves in connection with their employment, is unlawful and will not be tolerated by this organization.

The Company subscribes to the following guidelines concerning sexual harassment and has adopted them as Company policy. Moreover, as a part of the Company's overall nondiscrimination policy, the Company prohibits all forms of harassment of others because of race, color, religion, sex, age, national origin, ancestry, sexual orientation, physical or mental handicap, veteran, or other protected status. In particular, an atmosphere of tension created by discriminatory remarks or discriminatory animosity does not belong in our workplace and will not be tolerated.

For purposes of this policy, sexual harassment is defined as any type of sexually-oriented conduct, whether intentional or not, that is unwelcome and has the purpose or effect of creating a work environment that is hostile, offensive or coercive to a reasonable woman or man, as the case may be. The following are examples of conduct that, depending upon the circumstances, may constitute sexual harassment: (a) unwelcome and unwanted sexual jokes, language, epithets, advances or propositions; (b) written or oral abuse of a sexual nature, sexually degrading or vulgar words to describe an individual; (c) the display of sexually suggestive objects, pictures, posters or cartoons; (d) unwelcome and unwanted comments about an individual's body, sexual prowess or sexual deficiencies; (e) asking questions about sexual conduct; (f) unwelcome touching, leering, whistling, brushing against the body, or suggestive, insulting or obscene comments or gestures; and (g) demanding sexual favors in exchange for favorable reviews, assignments, promotions or continued employment, or promises of the same.

Complaints of Sexual Harassment

If you believe that you have been the subject of sexual harassment or subjected to hostile, offensive or coercive work environment, or if you are not sure whether certain behavior is sexual harassment or whether it is actionable under this policy, you are strongly encouraged to immediately notify your supervisor or Amy Francer or John Miersma whose work addresses and telephone numbers are listed below, so that the Company may have the opportunity to investigate and deal promptly with your complaint. An investigation of all complaints will be undertaken immediately, and all

information will be handled with the highest degree of confidentiality possible under the circumstances and with due regard for the rights and wishes of all parties.

Any employee of the Company who is found by the Company after an investigation to have harassed another in the workplace will be subject to appropriate discipline up to and including termination, depending upon the circumstances.

If needed, please notify:

Amy Francer
Iwaki America, Inc.
5 Boynton Rd., Holliston, MA 01746
(508) 474-2029

John Miersma
Iwaki America, Inc.
5 Boynton Rd, Holliston, MA 01746
(508) 474-2080

State and Federal Remedies

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC – 180 days; MCAD – 6 months).

Employees may also contact:

Mass Commission Against Discrimination
One Ashburton Place, 6th Floor
Boston, Massachusetts 02108
(617) 994-6000

Equal Employment Opportunity Commission
One Congress Street, 10th Floor
Boston, Massachusetts 02114-2023
(617) 565-3200

Whistleblower Policy

A whistleblower is an employee of Iwaki America, Inc. ("the Company") who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact the Human Resources Director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or

poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Director of Human Resources who is responsible for investigating and coordinating corrective action.

Infectious Disease Guidelines

Iwaki America, Inc. will take proactive steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of Iwaki America to strive to operate effectively as an essential business and ensure that all employees are safe within the workplace.

Iwaki America is committed to providing information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak.

Preventing the Spread of Infection in the Workplace

Iwaki America will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as bathrooms, breakrooms, conference rooms, door handles and railings. A committee will be designated to monitor and coordinate events around an infectious disease outbreak, as well as to create work rules that could be implemented to promote safety through infection control.

We ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace. The best strategy remains the most obvious—frequent hand washing with warm, soapy water; covering your mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets. We will also install alcohol-based hand sanitizers throughout the workplace and in common areas.

Unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans. For example, employees might want to arrange for work alternative options to care for children while schools close and/or speak with supervisors such as the possibility to work from home temporarily or on an alternative work schedule.

Limiting Travel

During times of a pandemic employees who travel as an essential part of their job should consult with management on appropriate actions.

Employees should avoid commuting to work together when possible.

Telecommuting

Telework requests will be handled on a case-by-case basis. While not all positions will be eligible, all requests for temporary telecommuting should be submitted to your manager for consideration. (See Telecommuting Guidelines section of the Handbook.)

Staying Home When Ill

Many times, with the best of intentions, employees report to work even though they feel ill. We provide paid sick time and other benefits to compensate employees who are unable to work due to illness. [refer to PTO policy in our Handbook].

During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: Examples include fever, cough, sore throat, runny or stuffy nose, body aches, headache, nausea, vomiting, chills and fatigue. Currently, the Centers for Disease Control and Prevention recommends that people with an infectious illness such as the flu remain at home until at least 24 hours after they are free of fever (100 degrees F or 37.8 degrees C) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.

Requests for Medical Information and/or Documentation

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought.

Confidentiality of Medical Information

Our policy is to treat any medical information as a confidential medical record. In addition, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.

Social Distancing Guidelines for Workplace Infectious Disease Outbreaks

In the event of an infectious disease outbreak, Iwaki America may implement these social distancing guidelines to minimize the spread of the disease among the staff.

During the workday, employees are requested to:

1. Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail or instant messaging via Teams to conduct business as much as possible, even when participants are in the same building.
2. If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit or stand at least 6 feet from each other if possible; avoid person-to-person contact such as shaking hands.
3. Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
4. Do not congregate in around copiers, water coolers or other areas where people socialize.
5. Bring lunch and eat at your desk or away from others

6. If you must go out to get lunch, only go to restaurants that allow outside pick-up or drive-thru.

Outside activities

Employees are encouraged to the extent possible to:

Practice social distancing and limit or avoid recreational or other leisure activities, etc.

Iwaki America Training Program

Goals

The overall **Goals** of the program are to:

1. Insure and document that all employees are qualified to serve in their current positions.
2. To provide a clearly defined means for training-up employees:
 1. To improve in their current positions,
 2. To back-up other employees at the same level,
 3. To meet specific business plan goals and
 4. To advance within the organization.
3. The Program can be accessed through our intranet site and ADP.

Job Descriptions

1. **Job Descriptions** list the skills/training/education/certification/membership required for each position. Asterisks designate must-haves.
2. The **Approved by Exception Form** shall be used to document the rationale for hiring an employee who does not meet some of the requirements of the job description.

Employment Application

The standard **Employment Application** shall be used by all Iwaki America job applicants.

Onboarding

1. The **General Onboarding Checklist** covers activities common for all new employees
2. The **Job-Specific Onboarding document** shall be used by the hiring manager to define unique onboarding activities and the related timeline

3 Month Review

The **Three-Month Review Form** shall be completed by the hiring manager for all new employees including temp-to-perm hires

Annual Reviews

1. **Annual Reviews** shall list skills/training/education/certification/membership goals achieved for the year just ended and follow-on goals for the new year
2. Goals may also be listed in the **Performance Management Problem Solving Form**

ISO Training Requirements

1. Training of employees in many functions is required by/controlled by ISO.
2. The relevant ISO procedure is QU00033 which:
 - a. Defines the process for establishing, maintaining and upgrading competency
 - b. Establishes the criteria for qualifying trainers
 - c. Requires that an ongoing record of completed training be maintained.

Cross Training Matrix

The **Cross-Training Matrix** shall be maintained outside of ADP as a clear, complete snapshot of planned cross-training including back-up training.

Training Curriculum Library

1. Training curriculum / links to training curriculum will be maintained on the Shared drive & accessible through the intranet
2. Some training is verbal only
3. Related to this, completion of some training is based on time in a specific job
4. The training curriculum on the Shared drive will be accumulated over time

ADP Workforce Talent Profile Tracking Tools

ADP Workforce will be used to,

1. Define nomenclature (specific common descriptions) for skills/training/education/certification/membership.
2. Record each employees' actual skills/training/education/certification/membership data.
3. List the current skills/training curriculum.

You must use the Program nomenclature when you write your annual reviews.

ADP Talent Profile Home Page

1. Summarizes all supporting pages:
 - a. Licenses & Certifications
 - b. Education
 - c. Skills
 - d. Previous Employers
 - e. Languages
 - f. Training

g. Memberships

h. Awards

2. *Current data / starting point for all employees has been filled in.*

ADP Talent Profile-Licenses & Certifications

1. Shall be used to record relevant licenses & certifications
2. Drop-down menu includes many common choices
3. Document number
4. Date earned and expiration date

ADP Talent Profile-Education

1. Shall be used to record degrees earned
2. Type of degree & major/minor areas
3. Drop-down menus include many common degrees & majors
4. Degree-granting institution
5. Date earned
6. Company paid or not

ADP Talent Profile-Skills

1. Shall be used to record skills developed, including those developed as a result of training
2. Drop-down menu includes most relevant choices
3. Proficiency level, from drop-down menu
4. Date acquired

ADP Talent Profile-Previous Employer

Shall be used to record relevant data from previous employers

ADP Talent Profile-Languages

Shall be used to record:

1. Language skills
2. Proficiency
3. Date Acquired

ADP Talent Profile-Training

1. Shall be used to record vocational training completed including course name & subject
2. Drop-down menus include many common choices

3. Date earned
4. This is the screen that should see the most use

ADP Talent Profile-Memberships

1. Shall be used to record relevant memberships
2. Drop-down menu includes many common choices
3. Membership ID number
4. Effective date and expiration date

ADP Talent Profile-Awards

1. Shall be used to record relevant awards
2. Some may be internal to Iwaki America
3. Awarding body
4. Award type
5. Award date

Training Effectiveness Survey

1. The **Training Effectiveness Survey** shall be filled out for all completed training
2. This will be the basis for improving curriculum over time

Employee Benefits

Employee Benefits

Regular full-time employees are eligible to participate in the full employee benefit package including health, dental, life, short-term and long-term disability insurance, voluntary (supplemental) life insurance, parental leave, 401(k), Medical Reimbursement (Flexible Spending), BJ's Membership, Dell Employee Purchase Program, Employee Assistant Program and Tuition Reimbursement. Premium cost of the life insurance, short-term and long-term disability is fully paid by Iwaki America. Employees and Iwaki America share the cost of the health insurance plans.

Health Insurance

Health Plans, Inc. a Harvard Pilgrim subsidiary - No Primary Care Physician or referrals required. Employees are responsible for the first \$250/\$500 of deductible expenses. Please see Human Resources for further information.

You have up to 30 days from your employment date to make your medical plan election. Once made, your election is generally fixed for the remainder of the plan year. However, if you undergo a change in family status (qualifying event), you may make a mid-year change in coverage providing you do so within 30 days from the date of change in family status. Please contact Human Resources to determine if a family status change qualifies under the plan document. At the end of the plan year (which runs October 1 through September 30), during open enrollment you are free to change your elections for the following plan year whether or not you have a change in family status.

For those not enrolled in a medical plan, Iwaki America pays a medical opt-out bonus of \$50 per week. This is taxable income. You must have another health care plan (spouses for example) to participate in the "opt-out" option. Spouses and children that work at Iwaki America who are covered under either their spouses' or parents' Iwaki America health insurance plan are not eligible to receive the "opt-out" reimbursement.

Dental Insurance

Delta Dental

Our current plan provides a \$2,000 calendar year maximum per person. Iwaki America will reimburse 50% of any covered costs incurred over the \$2,000 maximum up to a maximum of \$6,000 in dental charges. Example: you pay the first \$2,000 and Iwaki America will pay 50% (\$2,000) of the next \$4,000. Orthodontia coverage is eligible for the reimbursement program once the Delta Dental lifetime maximum of \$1,500 has been reached.

Health and Dental benefits will terminate upon last day of employment and are subject to COBRA continuation provisions.

Vision Insurance

EyeMed Insight

Our current plan provides for an eye exam and contacts or lenses once every plan year. Frames are allowed once every other plan year. If you stay in network eye exams are a \$10 copay and there is a \$130 allowance on frames with an additional discount and copays on eyeglass lenses with

additional allowances on contact lenses. This is an optional pre-tax benefit. The premium is 100% paid by the employee.

Flexible Spending Account

Pre-tax deductions for health care and dependent care. The period runs from October 1 through September 30 with an added 2-month grace period. Per IRS regulations, if you do not use all monies deposited through payroll deduction by November 30, you lose it.

You have until December 31st to submit any claims incurred during the plan year or during the grace period.

Reimbursable through Group Dynamic, Inc., the 3rd party administrator. Reimbursement forms are available on our Intranet and through HR.

Life Insurance

Basic Life and Accidental Death and Dismemberment (AD&D) = 2X annual salary up to maximum of \$500,000. (Company paid benefit – guaranteed issue \$300,000)

Voluntary Life = 5X annual salary up to max of \$500,000. (Employee paid benefit – guaranteed issue \$100,000)

Dependent Life = \$100,000 maximum for spouse not to exceed 50% of the employee's benefit, \$10,000 for dependent children older than 14 days (Employee paid benefit)

Short Term Disability

Income protection insurance - 67% of weekly gross salary/wages at time of disability. Any salary increases during the period of disability will become effective on the day the employee returns to work. Weekly benefit is subject to a minimum of \$10 and a maximum of \$1000. 13 weeks of coverage. Coverage begins on 1st day of accident or 8th calendar day for pregnancy or sickness (5 working day waiting period). Company paid benefit. Employees are expected to go on short-term disability insurance if they are disabled. The employee has the option to use any PTO remaining prior to going on disability, with the understanding that you may not buy-back PTO.

Long Term Disability

Income protection insurance - 60% of monthly gross salary/wages at time of disability. Any salary increases during the period of disability will become effective on the day the employee returns to work. Continues through disability or to age 65. Monthly benefit is subject to a minimum of \$100 and maximum of \$10,000. Company paid benefit.

Retirement Savings 401k Plans

All regular full-time and part-time employees, who are 18 years of age or older, are eligible to participate in the 401(k) plans. The 401(k) plans allow you to elect the amount of salary you want to contribute and direct the investment so you can tailor your own retirement package to meet your individual needs. You may change your deductions at any time and your investment allocations once per quarter. Employees may contribute up to the IRS annual maximum of their annual salary (unless you are in a highly compensated salary category). Iwaki America will match 50% of the first 6% of your annual salary for a maximum match of 3%.

There is a four-year vesting schedule for Iwaki America's matching contribution. Vesting Schedule (your ownership of company match):

| <u>Years of Service</u> | <u>Vesting Percentage</u> |
|-------------------------|---------------------------|
| Less than 1 | 0% |
| 1 but less than 2 | 25% |
| 2 but less than 3 | 50% |
| 3 but less than 4 | 75% |
| 4 or more | 100% |

Tuition Reimbursement

Full time employees become eligible for tuition reimbursement after six months of full-time employment. This benefit applies to courses that commence after the six-month waiting period, and to those employees who are actively employed at the time reimbursement is requested.

Tuition reimbursement requests are considered on a case-by-case basis. Only courses that are related to job opportunities within Iwaki America will be considered. If approved by their manager and the HR department, the benefit provides 100% tuition reimbursement (not including fees) and cost of books up to a maximum of \$10,000 per year, in which the employee earns a grade of “C” or better. Employees must complete and submit the approved Tuition Application Form to HR prior to enrollment in a course. Only those applications approved for tuition reimbursement prior to the first day of a designated course will be eligible for reimbursement. Once the course is completed the employee must complete and submit the Tuition Reimbursement Form. Both forms are located on our Intranet as well as in the HR department.

If an employee does not achieve a grade of “C” or better, Iwaki America will not reimburse for tuition and all other costs of the course.

If an employee terminates his/her employment for any reason after receiving tuition reimbursement, he/she will be responsible for repaying 100% paid within the last 12 months and 50% paid within the prior 12 months.

Publication Bonus

An employee who authors an article, which is published in one or more relevant trade journals or publications, will be awarded a one-time bonus of \$1,000.00 upon publication. (Publicity submissions, press releases, and ads are not eligible for the publication bonus.) An employee needs to have advance approval of topic and target publication from his/her immediate supervisor. This is a one-time payment per article. There is no limitation to the number of articles an employee wishes to submit.

Professional Designation Fees

Iwaki America will pay for professional designation fees which are relevant to your current position and approved by your Manager. Any professional designation fee unrelated to your position must be approved by your Manager.

Employee Referral Bonus

This program is designed to encourage employees to recommend applicants to the Iwaki America Group for open positions. If the employee refers an applicant and that person is subsequently hired, the employee will be eligible for a cash award as outlined below. We will pay \$1,000.00 for a full-time position and \$500.00 for a part-time position. The award is paid in two installments: ½ after the employee has completed 3 months of employment and the other ½ after the new employee has completed 6 months of employment. The referring employee must be employed by Iwaki America at the time the award would be made. All awards are made through payroll and will be subject to applicable tax withholding and savings plan deductions. An Employee Referral form must be completed and submitted to the Human Resources department accompanied by an Iwaki America application form or the candidate's resume.

Holiday bonus

New employees hired before the date that the Company holiday bonus is given will get the full amount. Any non-U.S. employee that receives a 13th month or holiday bonus based on their governmental rules are excluded from receiving the Company holiday bonus.

Gainsharing

Iwaki America will share the rewards of improved performance with those permanent employees who do not participate in another incentive compensation plan. Gainsharing programs are self-funded based on savings the company realizes across all departments through productivity improvements and cost reduction measures. This will be measured by Sales/Total Hours Worked by eligible employees and operating profit as a percentage of Sales. If hired prior to the 15th of the month he/she will receive credit for the entire month. If hired after the 15th of the month he/she will not receive credit for that month. Employees who are on a Leave status and do not contribute to Hours Worked during the entire quarter, will receive a pro-rated amount. If an employees' hours are reduced, including by Leave, he/she will accrue in proportion to hours worked. If an employee terminates prior to the payment date or measurement period, no payment will be received. This program will be subject to change upon Management's discretion.

Wellness Program

Iwaki America's Wellness Program promotes a healthful work environment and supports the adoption of healthy habits by employees who want to improve their own health and fitness levels. It is an incentivized, work-site wellness program that includes 12 monthly challenges/year. We have a Wellness Committee which meets to develop, promote and implement wellness initiatives to optimize health and well-being among our employees. There is an online interactive Wellness portal that allows you to have access to customized programs, search the most current medical and health-related issues and much more. If an employee terminates prior to the payment date for a completed Wellness challenge, payment will be included in your termination pay. See HR for additional information.

Flu Clinic

Health Plans conducts an annual Flu Clinic at 5 Boynton Road each Fall which is available to all employees, spouses, as well as Temporary employees.

Employee Assistance Program

CompEAP provides professional and confidential counseling services designed for you and your immediate family members at no cost to the employee. They can be reached 24 hours-a-day, 7 days a week via the toll-free number 800-344-1011. In addition, it also provides resources and referral information to assist in making such decisions as choosing day care, planning for college, finding elder care, or legal and financial consulting. See Human Resources for more details.

BJ's Wholesale Club

Employees may purchase a membership to BJ's at a discount price. Please see Human Resources for details.

Dell Employee Purchase Program

Employees can receive up to 12% discount on Dell Dimension™ and Inspiron™ Home & Home Office products along with discounted 3-5 business day ground shipping.

Turkeys

The Company may distribute Thanksgiving Turkeys each year to all Holliston-based employees. Any employee working off-site may receive \$50 instead of a turkey.

Workwear

Iwaki America provides its manufacturing and warehouse employees with individually fitted workwear that must be worn during the workday. This includes shirts, pants, and safety shoes. Upon issue, Company workwear becomes the responsibility of the employee for maintenance and care. Employees will receive new shirts and pants every three years, and safety shoes every two years. If replacements are needed before two years and is not due to normal wear and tear in the workplace, the employee will be required to purchase the replacement workwear. Workwear is provided as a benefit to employees, and to portray a professional and uniform appearance for our visitors. Workwear must be worn in a neat and professional manner and may not be covered with other articles of clothing.

Verizon Wireless Discount Plan

Employees are eligible to participate in the Verizon Wireless Discount Plan and receive up to 17% off your monthly bill if you have a monthly plan costing at least \$34.99. Go to www.verizonwireless.com and enter your work email address or go to your nearest Verizon store.

Working Advantage Discount Program

No fee employee discount program on theater events, travel, shopping and more. Please see Human Resources for details.

Charitable Donations

Iwaki America recognizes the importance of corporate social responsibility and good citizenship. We are often asked by our employees to support a wide range of worthwhile causes, events and charitable organizations. We will make every effort to accommodate as many requests as possible.

In order for your organization to be considered for a corporate charitable donation, Iwaki America has established the following guidelines for donation requests:

- The process begins with the Corporate Charitable Donation Request Form (“the Form”). This document is available on the Intranet
- All recipients of a donation must be designated or registered as an IRS recognized charity or a non-profit organization
- All requests must include the charity’s federal tax ID number
- All letters must be on official organization letterhead. Computer generated flyers and emails are not formal letters but may be attached to the Form
- The Form must contain the date of the event, organizations’ tax ID number, address and phone number, the contact persons’ name, email address, address and phone number, the type of fundraiser and in what capacity will the proceeds be utilized
- All donation requests will be approved each quarter at the company board meeting. The board will decide on an amount to give each quarter. The decision may be a donation or a match, if there is an individual fundraising component.
- We will give preference to individual fundraising and to the local community.
- Further consideration will be given to organizations that our employees actively participate in volunteering
- Please be prepared to verify what percentage of the donation goes to the charity or non-profit organizations, stated goals, and what percentage goes to administration

Please provide all requests to: Human Resources, Iwaki America, Inc., 5 Boynton Road, Holliston, MA 01746 or email to: hr@iwakiamerica.com.

Benefits Continuation (COBRA)

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their covered dependents the opportunity to continue medical insurance coverage under Iwaki America Group’s health plan for a period of 18 months up to 36 months when a “qualifying event” would normally result in the loss of eligibility. Some common qualifying events are voluntary or involuntary termination of employment (other than for gross misconduct), or death of an employee; a reduction in an employee’s hours or a leave of absence; an employee’s divorce or legal separation; you become entitled to Medicare; and a dependent child no longer meeting eligibility requirements. In the event of divorce, legal separation, or a child’s loss of dependent status, you or a family member must notify the plan administration within 60 days of the occurrence of this event. Under COBRA, the employee or beneficiary pays the full cost of coverage at Iwaki America’s group rates. Iwaki America provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for

coverage under Iwaki America's health insurance plan. The notice contains important information about the employee's rights and obligations.

Health Insurance Portability and Accountability Compliance (HIPAA) Policy

Iwaki America, Inc. is not a covered entity as defined by HIPAA; however, we do maintain health care and related plans that are subject to HIPAA requirements. Thus, Iwaki America has made a decision that HIPAA privacy and security provisions will apply to protected health information (PHI) maintained by Iwaki America.

HIPAA regulations will be followed in administrative activities undertaken by assigned personnel when they involve PHI in any of the following circumstances: health information privacy, health information security and health information electronic transmission. Iwaki America will consider any breaches in privacy and confidentiality of handling of PHI to be serious, and disciplinary action will be taken in accordance with our code of conduct. Iwaki America has designated a HIPAA compliance officer (HCO), Amy Francer, and questions regarding policy provisions should be addressed to the HCO. This policy is supplemented by new operating procedures issued by the HCO and will be effective immediately. Company records that are governed by this policy will be maintained for a period of no less than six years, and when the maximum retention period has passed, the records will be subject to Iwaki America's policy for completed record destruction.

Expense Reports

Expense reports should be submitted within one week after each month is closed. Currency Conversion for foreign employees will be determined by using daily market rates as published in the Wall Street Journal.

Jury Duty

Iwaki America will provide employees who are selected to report for jury duty the full amount of their standard wages for whatever portion of work time missed due to juror service, less any compensation received from the state and other jurisdictions. You are expected to report to work on any day or any portion of a day that you are not required to be in court. Employees should inform their supervisor when notified for jury duty and, upon completion, should provide HR with the certificate of juror service provided by the court.

Paid Time Off

Bereavement Leave

In the event of the death of an immediate family member, Iwaki America will provide the employee with up to three consecutive days-paid leave. Requests should be made to the supervisor and/or the Human Resources department. An immediate family member is considered to be spouse, sibling, sibling in-law, child, step-child, parent, parent in-law, step-parent, step-parent in-law, grandparent, grandparent-in-law or grandchild. Proof of cause for bereavement leave will be requested.

Holidays

Iwaki America provides at least ten paid holidays annually and these are published on our Intranet by year's end for the subsequent year.

Regular part-time and part-time employees accrue holiday hours at a proportional rate to hours worked.

Volunteer Day

The purpose of the Company Volunteer Day program is to support activities that enhance and serve communities in which we live and work and the issues that impact quality of life. The intention is to participate in giving back and supporting the community and to allow the employees of the Company to share in that effort. At the same time, the Company recognizes that participating in these sorts of activities enriches the lives of its employees.

Employees can spend a half day (4 hours) per calendar year volunteering at a 501c3 charitable organization while being paid by the Company. If you would like to spend a full day (8 hours), employees must submit a request for PTO for the remaining half day (4 hours) not paid for by the Company. The pay rate will be your current base salary on the day the time is taken. This time is refreshed at the beginning of each calendar year, unless the program is amended or discontinued, and does not accrue from year to year. Usage of this time does not affect vacation accrual or sick leave usage.

All full-time and part-time, active employees are eligible to participate in this program. There is no minimum service requirement for participation in this program. Employees can choose a charity of their choice or work together with other employees as part of a team effort at an organization of the Company's choice.

Employees must fill out a Volunteer Day Request Form and submit it to his/her manager at least one week before the requested time off. The manager should then get HR approval as well. Approval is at the discretion of the employee's manager and HR. You must provide proof of participation at a Volunteer program of your choice. Company sponsored Volunteer time may not be used for organizations that discriminate based on creed, race, religion or sexual orientation.

Enter any Volunteer time taken in your Paid Time Off section in ADP (click 'request time off', choose Volunteer time and enter the number of hours).

Personal Leave/Paid Time Off (PTO)

Regular full-time employees accrue paid time off (PTO) at a rate of 1.5 days per completed calendar month during the first five years of service (up to 18 days) and 1.92 days per month (up to 23 days) thereafter. Regular part-time and part-time employees are eligible to receive pro-rated PTO. Available PTO includes all vacation and sick time off, no additional time will be provided.

Employees who would prefer to reduce their PTO accrual rate from 23 days a year to 18 days a year will have a one-time, permanent option of reducing the PTO accrual rate in exchange for an additional, permanent 2% raise (the equivalent of one weeks' pay). This reduction option will be made available to you once a year during the month of June, to be effective with the first payroll in July. A form will be available on ADP for you to complete. Once you reduce your PTO accrual rate to 18 days a year you will remain locked into that amount of time off permanently. This is not a PTO buyback program; this is a reduction in accrual rate program.

PTO must be used in at least half-hour increments. Eight PTO days (64 hours) per year will be allocated as sick/unplanned days; the remaining PTO time will be allocated as vacation/planned days. All planned PTO requires advanced notice of at least one day, unplanned PTO requires notice each day as soon as possible, generally before the beginning of your scheduled shift. All requests for PTO, whether planned or unplanned, must be made to and approved by your supervisor. PTO must be entered within 24 hours after returning to work after missed time.

You may take 8 of these days (64 hours) as sick/unplanned time (pro-rated for part-time employees), however, the expectation is that the remaining time off will be planned. This is important for scheduling purposes in a manufacturing environment. Unforeseen absence or lateness should be reported by phone to the supervisor and/or Human Resources no later than 8:30 a.m. that day. Subject to applicable law, each incident of unplanned time off after the 8 unplanned days will result in progression through the Performance Problem Solving process and may lead to termination of employment.

You may be required to provide written documentation for use of earned sick time that exceeds 24 consecutively scheduled work hours (3 consecutive workdays) and/or occurs within two weeks prior to your final scheduled workday before termination/resignation.

It is the Company's expectation that Paid Time Off (PTO) will be used in the year it accrues. A maximum of 10 days (80 hours) of accrued PTO may be carried over from one calendar year to the next. Accrued PTO in excess of 10 days will be forfeited at year-end. Please remember your December accrual will be posted at the end of the day on 12/31. If your accrual shows 93.03 after the 12/31 accrual, then on 1/1 13.03 hours will be forfeited (93.03 hours accrued minus 80 hours allowable carryover).

Only under circumstances determined to be extraordinary by the Company will the company consider any employees' request to sell back accrued but unused PTO.

To ensure the Company is able to meet production needs and provide the best service and support to our customers, it's expected that employees will take no more than 10 days of PTO at a time. Requests for more than 10 days of consecutive PTO will be reviewed on a case-by-case basis by your manager, and such requests should be limited to once every 3+ years.

PTO requests may be submitted up to three months in advance. Department Managers will evaluate each PTO request and approve or disapprove based on the needs of the Company and fairness to all employees. This is particularly important around the end of each quarter and Holidays when we must maintain a sufficient work force to run the business efficiently and meet the needs of our customers. Leads and Shippers may take up to 3 days off over the last 10 working days of a quarter (exceptions may be considered on a case-by-case basis). Leads and Managers will do their best to balance PTO requests to ensure fairness from year-to-year.

Effective July 2020, you may not have a PTO balance of more than negative 40 hours. If negative 40 hours is exceeded, Iwaki America will begin the disciplinary process and you will not be paid for those PTO hours taken. Cases of "borrowing ahead" (i.e. creating a negative PTO balance) will be reviewed on a case-by-case basis and approved at the discretion of Management.

Accrued but unused PTO will be paid out upon termination of employment. PTO accrual occurs on the last day of the month for time worked. Employees must work the full month in order to receive PTO accrual. The effective date is the last day worked. If you have a negative balance on your PTO accrual at the time your employment ends, this amount will be deducted from your last paycheck to the maximum extent permitted by law. If this results in less than minimum wage for hours worked, you will be paid minimum wage for hours worked.

This policy is not intended to affect, or shall not be interpreted as affecting, an individual's rights under applicable law.

Regular part-time and part-time employees are eligible to receive pro-rated personal leave.

The minimum amount of PTO you can use is one half hour increment.

Leave of Absence

A leave of absence (LOA) is defined as authorized time away from work, with or without pay, above and beyond time away from work covered by specific federal or state laws or regulations which are addressed elsewhere in this Handbook. LOA's are to be approved by an employee's supervisor and Human Resources on a case-by case basis and documented in the form of a written agreement between the employee and the company on the Leave of Absence form. Failure to return from a LOA may result in termination.

All employees who are actively at work, on workers' compensation or using Paid Time Off (PTO) will continue to accrue PTO benefits. Employees who are receiving short-term or long-term disability will not accrue PTO benefits. Employees on workers' compensation will use their Paid Time Off (PTO) for the required 5 day waiting period.

However, employees on eligible military leave may be entitled to reinstatement upon returning from military leave with all benefits that would have been obtained but for being absent on military leave. This right is provided for by the Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA) and is known as the "escalator principle."

When an employee is out on leave that is protected by the Family Medical Leave Act (FMLA), that employee will continue accruing paid leave as long as the employee is using PTO benefits. If an employee on FMLA leave uses all paid leave in accordance with the company's FMLA policy and remains unable to return to work, then the remainder of the FMLA leave will be unpaid. During the period of unpaid FMLA leave, the employee will not continue to accrue PTO, consistent with the company's policy for all types of unpaid leave.

A leave of absence (LOA) for reasons other than medical may be approved, without pay, upon receiving a signed request from the employee and the recommendation of your Supervisor or Manager. To be eligible for leave for reasons other than medical, you must be in Iwaki America's employ for at least six (6) months. With the exception of Military LOA, all unpaid leaves will require that available paid time off have been exhausted.

Leave of Absence (Family Medical Leave Act)

Iwaki America complies with the Federal Family and Medical Leave Act of 1993 and The Massachusetts Parental Leave Act.

Under this policy, Iwaki America will grant up to 12 weeks of unpaid leave (or up to 26 weeks of unpaid military caregiver leave to care for a covered service member with a serious injury or illness) per rolling 12-month period to eligible employees. The 12-month period is determined by measuring backward from the date an employee takes any FMLA leave. If an employee has accrued Paid Time Off (PTO) at commencement of his/her family leave, the employee must use such leave time for which he/she may be eligible under the Paid Time Off (PTO) provisions.

Eligibility:

To qualify to take family or medical leave under this policy, the employee must meet all of the following conditions:

- Employee must have worked for Iwaki America for at least twelve (12) months (or 52 weeks). The 12 months or 52 weeks need not have been consecutive. Separate periods of employment will be counted, provided that the break in service does not exceed seven years. Separate periods of employment will be counted if the break in service exceeds seven years due to National Guard or Reserve military service obligations or when there is a written agreement stating the employer's intention to rehire the employee after the service break.
- Employee must have worked at least 1,250 hours during the preceding twelve (12) month period immediately before the date when the leave is requested to commence. The principles established under the Fair Labor Standards Act (FLSA) determine the number of hours worked by an employee. The FLSA does not include time spent on paid or unpaid leave as hours worked. Consequently, these hours of leave should not be counted in determining the 1,250 hours eligibility test for an employee.
- The employee must work in a worksite where 50 or more employees are employed by Iwaki America within 75 miles of that office or worksite. The distance is to be calculated by using available transportation by the most direct route.

Reasons for Leave:

Eligible employees may be granted Family and Medical Leave for any following reasons:

1. for the birth and care of a newborn child of the employee;
2. to care for an immediate family member (spouse, child or parent; in-laws are not included) with a "serious health condition";
3. for placement with the employee of a son or daughter for adoption or foster care; or
4. an employee may take leave because of a serious health condition that makes the employee unable to perform the functions of the employee's position. A "serious health condition" is an illness, injury, impairment or physical or mental condition that involves either:
 - a) Inpatient care (i.e. an overnight stay) in a hospital, hospice, or residential medical-care facility, including any period of incapacity (i.e. inability to work, attend school, or perform other regular daily activities) or subsequent treatment in connection with such inpatient care; or

- b) Continuing treatment by a health care provider, which includes:
- A period of incapacity lasting more than three consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition, that **also** includes:
 - i. Treatment two or more times by or under the supervision of a health care provider (i.e. in-person visits, the first within 7 days and both within 30 days of the first day of incapacity); **or**
 - ii. One treatment by a health care provider (i.e. an in-person visit within 7 days of the first day of incapacity) with a continuing regimen of treatment (e.g. prescription medication, physical therapy); **or**
 - Any period of incapacity related to pregnancy or for prenatal care. A visit to the health care provider is not necessary for each absence; **or**
 - Any period of incapacity or treatment for a chronic serious health condition which continues over an extended period of time (more than three consecutive calendar days) – including recurring episodes of a condition, requires periodic visits (at least twice a year) to a health care provider, and may involve occasional episodes of incapacity rather than a continuing period of incapacity. A visit to a health care provider is not necessary for each absence; **or**
 - A period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective. Only supervision by a health care provider is required, rather than active treatment; or
 - Any absences to receive multiple treatments for restorative surgery or for a condition that would likely result in a period of incapacity of more than three days if not treated.

This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences. For chronic conditions requiring periodic health care visits for treatment, such visits must take place at least twice a year.

The entitlement to leave for the birth or placement of a child for adoption or foster care will expire twelve (12) months from the date of the birth or placement. In some cases, the twelve (12) weeks of leave may be taken intermittently or on a reduced schedule if medically necessary. Where an employee uses her FMLA leave for reasons other than for the birth, adoption, or placement of her child, relevant state laws may entitle the employee to additional weeks of leave for the birth, adoptions, and/or placement of her child.

If a husband and wife both work for Iwaki America and each wish to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent "in-law") with a serious health condition, the husband and wife may only take a combined total of 12 weeks of leave. If a husband and wife both work for Iwaki America and each wish to take leave to care for a covered injured or ill service member, the husband and wife may only take a combined total of 26 weeks of leave.

5. for qualifying exigencies arising out of the fact that the employee's spouse, son, daughter or parent is on active duty or call to active duty status as a member of the National Guard or Reserve in support of a contingency operation.

An employee whose spouse, son, daughter or parent either has been notified of an impending call or order to active military duty or who is already on active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following: 1) short-notice deployment, 2) military events and activities, 3) child care and school activities, 4) financial and legal arrangements, 5) counseling, 6) rest and recuperation, 7) post-deployment activities and 8) additional activities that arise out of active duty, provided that the employer and employee agree, including agreement on timing and duration of the leave.

The leave may commence as soon as the individual receives the call-up notice. (Son or daughter for this type of FMLA leave is defined the same as for child for other types of FMLA leave except that the person does not have to be a minor.) This type of leave would be counted toward the employee's 12-week maximum of FMLA leave in a single 12-month period.

6. Military caregiver leave (also known as covered service member leave) to care for an ill or injured service member.

This leave may extend to up to 26 weeks in a single 12-month period for an employee to care for a spouse, son, daughter, parent or next of kin covered service member with a serious illness or injury incurred in the line of duty on active duty. Next of kin is defined as the closest blood relative of the injured or recovering service member.

Benefits During Leave:

FMLA leave will be without pay except when an eligible employee uses accrued vacation or personal time to qualify for compensation during leave or use short-term disability. Employees will be required to substitute any accrued paid leave for an equivalent amount of unpaid FMLA leave.

During an unpaid leave period, no sick days, vacation time, gainsharing or holiday pay is earned or received. Employees are not entitled to accrue vacation or sick leave during any periods of unpaid FMLA leave. However, such leave periods will be treated as continued service for the purpose of calculating 401(k) plans vesting and eligibility.

Any FMLA leave to which an employee may be entitled runs concurrently with time off granted under this policy. In other words, an employee cannot take his/her full short-term disability benefits, and then take three months off under the FMLA; any time spent on short term disability counts as part of an employee's FMLA leave.

Health coverage will continue during this leave time. Iwaki America will maintain an employee's health insurance coverage for the duration of the employee's FMLA leave as though the employee were continuously employed. Iwaki America will continue to pay its portion of the employee's health insurance premiums (including medical opt-out bonus) provided that the employee pays his or her contributory portion within 30 days of the due date. Employees requesting leave should contact the Human Resources Department to arrange an acceptable payment schedule. If any

payment due is more than thirty (30) days late, Iwaki America may cease providing the benefits until the employee returns to work.

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member or a circumstance beyond the employee's control, Iwaki America will require the employee to reimburse Iwaki America the amount it paid for the employee's health insurance premium during the leave period.

Disability leave for the birth of the child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA. For example, if an employee will be out for six weeks of pregnancy disability leave, the six weeks will be designated as FMLA leave and counted toward the employee's 12-week entitlement. Once your approved disability ends, if you still have remaining FMLA entitlement you will then be required to use accrued paid time off, as appropriate before being eligible for unpaid leave for what remains of the 12-week entitlement.

Notice and Scheduling of Leave:

An employee who plans to take leave for an expected birth or placement or because of planned medical treatment must make an effort to schedule the treatment to reduce the disruption to the Department, subject to the health care provider's approval. At least thirty (30) days' written notice of the leave shall be given to the employee's supervisor whenever possible.

Where an employee cannot give thirty (30) days advance notice, the employee should give as much notice as soon as practicable (meaning the same day or the next business day). Within five business days after the employee has provided this notice, the HR manager will complete and provide the employee with the DOL Notice of Eligibility and Rights. If an employee fails to provide such notice, his or her request for leave may be denied or the conditions of that leave may be modified.

Medical Certification for Leave:

Employees will be required to provide a Medical Certification Statement if the leave request is for the employee's own serious health condition, to care for a family member's serious health condition, or military caregiver leave.

This Statement needs to be completed by the applicable health care provider, stating the reason, necessity, and expected duration of the leave within 15 days of requesting leave. Failure to provide certification may result in a denial of continuation of leave. Within five business days after the employee has submitted the appropriate Certification form, the HR Manager will complete and provide the employee with a written response to the employee's request for FMLA leave using the DOL Designation Notice.

Under FMLA regulations Iwaki America may directly contact the employee's health care provider for verification or clarification purposes using a health care professional, an HR professional, or members of the Executive Management team. Under no circumstances may this person be the employee's direct supervisor. As additional safeguards, Iwaki America (a) must first notify the employee in writing if the medical certification is insufficient or incomplete and give the employee seven days to provide the information requested; and (b) Iwaki America must not ask the

healthcare provider to offer information outside of what is requested on the certification form. Further medical verification may be required during the leave, depending upon the circumstances. Moreover, employees on leave may be contacted periodically for updates concerning their status and intent to return to work. Employees are expected to be fully responsive to such requests for updates. An employee on FMLA leave is expected to report periodically to the employee's supervisor on his or her status and intent to return to work.

Before an employee may return from a medical leave that has continued for at least five (5) consecutive calendar days, the employee's physician or health care provider will be required to certify that the employee is able to resume his or her job (fitness for duty clearance).

Recertification:

Iwaki America may request recertification for the serious health condition of the employee or the employee's family member no more frequently than every 30 days and only when circumstances have changed significantly, or if the employee receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of his or her leave. Otherwise, Iwaki America may request recertification for the serious health condition of the employee or the employee's family member every six months in connection with an FMLA absence. Iwaki

America may provide the employee's health care provider with the employee's attendance records and ask whether need for leave is consistent with the employee's serious health condition.

Restoration Rights:

At the end of a Family and Medical Leave, the Department will return the employee to his or her last position prior to the leave or to an equivalent position, except in certain cases involving "highly compensated" and "key" employees. While on unpaid leave, employees do not accrue additional vacation or sick leave time. However, the employee will not lose any benefit rights to the extent that those rights accrued before the leave period.

An employee will not be entitled to more favorable employment terms as a result of taking a Family and Medical Leave than he or she would have had if no leave had been taken. Thus, the employee will be subject to any pay or benefit reductions or other adverse actions, including layoff that would have been experienced if the employee had not been on a Family and Medical Leave.

Intermittent or Reduced Work Schedule Leave

Leave may be taken through either a reduced working schedule or on an intermittent basis if such an arrangement is certified by the applicable health care provider to be medically necessary. Employees are required to cooperate with Iwaki America to arrange reduced work schedules or intermittent leave so as to minimize disruption of business operations. Pro-rated Paid Time Off (PTO) will be earned based on the number of hours worked.

For the birth, adoption or foster care of a child, Iwaki America and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced hour schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

If the employee is taking leave for a serious health condition or because of the serious health condition of a family member, the employee should try to reach agreement with Iwaki America before taking intermittent leave or working a reduced hour schedule.

Qualifying exigency leave may be taken intermittently without regard to medical necessity or disruption of business operations.

Paid Family & Medical Leave (PFML)

Explanation of Benefits

Beginning January 1, 2021, employees may be entitled to the following paid leave within a benefit year under the Massachusetts Paid Family and Medical Leave Law:

- Up to 12 weeks of paid family leave in a benefit year for the birth, adoption, or foster care placement of a child, or because of a qualifying exigency arising out of the fact that a family member is on active duty or has been notified of an impending call to active duty in the Armed Forces.
- Up to 20 weeks of paid medical leave in a benefit year if they have a serious health condition that incapacitates them from work
- Up to 26 weeks of paid family leave in a benefit year to care for a family member who is a covered service member undergoing medical treatment or otherwise addressing consequences of a serious health condition relating to the family member's military service.

In addition, beginning on July 1, 2021, employees may be entitled to up to 12 weeks of paid family leave in a benefit year to care for a family member with a serious health condition.

Employees may be eligible for up to 26 total weeks, in the aggregate, of paid family and medical leave in a single benefit year.

The weekly benefit amount for paid leave will be based on the employee's earnings, with a maximum benefit of \$850 per week (subject to change based upon the State Average Weekly Wage).

Job Protection, Continuation of Health Insurance, No Retaliation

Generally, an employee who has taken family or medical leave under the law must be restored to the employee's previous position or to an equivalent position, with the same status, pay, employment benefits, length-of-service credit and seniority as of the date of leave. Iwaki must continue to provide for and contribute to the employee's employment-related health insurance benefits, if any, at the level and under the conditions coverage would have been provided if the employee had continued working continuously for the duration of such leave.

It is unlawful for any employer to discriminate or retaliate against an employee for exercising any right to which such employee is entitled under the paid family and medical leave law. An employee or former employee who is discriminated or retaliated against for exercising rights

under the law may, not more than three years after the violation occurs, institute a civil action in the superior court.

Employer/Employee Contributions to the DFML Family and Employment Security Trust Fund
On October 1, 2019, contributions to the Department of Family and Medical Leave (DFML) Employment Security Trust Fund began. Iwaki will be responsible for sending contributions to the DFML for all employees.

Currently, the total contribution amount is 0.75% of wages. Of that 0.75% total contribution amount, there is a split: 0.62% is for medical leave contribution and 0.13% is for family leave contribution.

Under the law, Iwaki is permitted to deduct from employees' wages up to 40% of the medical leave contribution and up to 100% of the family leave contribution. Iwaki will contribute 61% of the total medical leave contribution and 0% of the family leave contribution.

Payment for Concurrent Leave

Any paid leave provided under a collective bargaining agreement or Iwaki policy and paid at the same or higher rate than paid leave available under this law shall count against the allotment of leave benefits available under this law.

How to File a Claim

Employees must file claims for paid family and medical leave benefits with the Massachusetts Department of Family and Medical Leave using the Department's forms. Forms and claim instructions will be available on the Department's website www.mass.gov/DFML before January 2021.

Employees are required to provide at least 30 days' notice to Iwaki of the anticipated starting date of any leave, the anticipated length of the leave and the expected date of return. An employee who is unable to provide 30 days' notice due to circumstances beyond his or her control is required to provide notice as soon as practicable.

Department of Family and Medical Leave (DFML) Contact Information

The Massachusetts Department of Family and Medical Leave
Charles F. Hurley Building
19 Staniford Street, 1st Floor
Boston, MA 02114
(617) 626-6565
www.mass.gov/DFML

Paid Parental Leave Policy

Iwaki America, Inc. will provide paid Parental Leave of three consecutive days to male and female employees working at least 30 hours per week. You must be employed for at least three consecutive months. Employees requesting paid parental leave must provide two weeks' notice (or as much notice as is practical) of the departure date.

An eligible employee will be granted Parental Leave for the following purposes:

- Birth of child;
- Adopting a child under 18 years old (or under 23 in the case of a child who is physically or mentally disabled); or
- Placement of a child with an employee pursuant court order.

Employees requesting additional unpaid job protected parental leave need to refer to the Parental Leave and FMLA section of the Handbook as well as consult with HR.

Parental Leave

Full time employees who are not eligible for leave under the Family and Medical Leave Act may nonetheless be eligible for leave under the Massachusetts Parental Leave Statute for the birth of a child, adoption of a child under the age of 18 (or the adoption of a child under the age of 23 if the child is mentally or physically disabled), or placement of a child with an employee pursuant court order. If an employee has accrued paid time off (PTO) at commencement of her/his parental leave, the employee may use such leave time for which she/he may be eligible under the paid time off (PTO) provisions. Under this leave policy, Iwaki America will grant the employee up to eight (8) weeks of leave, with pay if the choice is to take accrued leave or without pay if there is no accrued leave, after employed for at least three consecutive months, if we are provided with:

- (1) two (2) weeks' notice of his/her expected departure date and notifies her/his immediate supervisor that she/he intends to return to her/his job;
- (2) states the anticipated date of return to work;

All employees are entitled to 16 weeks of unpaid leave rather than the usual eight if it's related to a birth or adoption of twins. Employees who are eligible for both twelve (12) weeks of leave under the FMLA and eight (8) weeks of leave under the Massachusetts law may take a maximum leave of twelve (12) weeks, if the leave is needed for the purpose of giving birth or adopting a child. Subject to the requirements outlined above, employees eligible for both kinds of leave may choose between Parental Leave of eight (8) weeks, with two (2) weeks' notice, or Family and Medical leave with thirty (30) days' notice. All full-time employees who have taken up to twelve (12) weeks of leave under FMLA for a purpose other than childbirth or adoption are entitled under Massachusetts law to take eight (8) additional weeks of parental leave.

During an unpaid leave period, no sick days are accumulated, nor vacation time earned. Health coverage will continue during this leave time. Upon the employee's return to work, the employee will be restored to his/her prior position or to a similar position with the same status, pay, length of service credit and seniority, as of the date of leave. Under Massachusetts parental leave law, Iwaki America is not required to restore the employee to her previous or a similar position if other employees of equal length of service credit and status, in the same or similar position, have been laid off due to economic conditions or other changes in the operating conditions affecting employment during the period of such parental leave.

Spouses and partners who are both employees of Iwaki America are entitled to a combined twelve (12) weeks of FMLA leave or eight (8) weeks under Parental leave.

Act Relative to Domestic Violence (ARDV)

An Act Relative to Domestic Violence (the “ARDV”), provides up to 15 days of unpaid leave per rolling 12-month period to victims of domestic violence, sexual assault, kidnapping, and/or stalking, and certain family members, for purposes directly related to the abuse.

An employee may take ARDV leave for his or her own abuse, or due to the abuse of a covered family member, including his or her spouse, child, parent, grandparent, grandchild, or sibling. The employee must use the leave from work to get medical attention, counseling, victim services or legal assistance; secure housing; obtain a court protective order; appear in court or before a grand jury; meet with law enforcement officials; attend child custody proceedings; or address other issues directly related to the abusive behavior. Perpetrators of abuse are not entitled to ARDV leave.

Before taking ARDV leave, an employee must exhaust all of his or her accrued paid time off, including but not limited to sick time, vacation days, and personal time. Once the employee has exhausted accrued paid time off, the remainder of the ARDV leave will be unpaid. Employees must provide advance notice of their need for leave whenever possible, but this requirement does not apply if the employee or a covered family member faces imminent danger to his or her health or safety. In the event that an employee does not provide advance notice based on a risk of imminent danger, he or she must notify the employer within three business days that the time off was related to domestic violence. If the employee cannot notify the employer, a family member may do so on his or her behalf. The ARDV also permits certain counselors, clergy, and helping professionals to provide such notification.

Employees are required to provide documentation supporting the claim to ARDV leave. Such documentation can consist of a protective order or other court document, police report, police witness statement, documents reflecting the perpetrator’s conviction or admission of guilt, medical documents, and/or a victim advocate’s or other helping professional’s sworn statement. In lieu of the documents listed above, an employee may also submit his or her own sworn statement signed under the pains and penalties of perjury.

Employees will be entitled to return to the same or a substantially equivalent position once their leave has ended.

Small Necessities Leave Act 1998

This law applies to employees who work in Massachusetts, have worked for Iwaki America for at least 12 months and have worked at least 1250 hours during the 12 months before leave is requested. Under the Act, an eligible employee is entitled to take 24 hours of unpaid leave in a calendar year.

The 24 hours of SNLA are additional to the 12 weeks of FMLA and may be taken intermittently or all at once, in whole days or hourly increments.

Employees may elect to use earned vacation balances or personal leave balances during the otherwise unpaid SNLA leave period.

Applicable Circumstances

- Participation in school activities directly related to the “educational advancement” of the employee’s son or daughter, such as parent-teacher conferences or interviewing for a new school;
- Accompanying one’s son or daughter to routine medical or dental appointments such as checkups or vaccinations, or emergencies with supporting documentation;
- Accompanying an “elder relative” to routine medical or dental appointments or appointments for other professional services related to the elder’s care, such as interviewing at nursing or group homes.

Definitions

- The term “elderly relative” is defined as an individual at least 60 years of age who is related by blood or marriage to the employee, including a parent.
- The term “school” is defined as a public or private elementary or secondary school, Head Start program assisted under the Head Start Act, or a state-licensed children’s daycare facility. Thus, an unlicensed home daycare arrangement or babysitting service would not qualify. Likewise, accompanying an older child to visit colleges would not be covered.
- The term “son or daughter” is defined as a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis. The son or daughter must either be under 18 years of age or 18 years of age or older and incapable of self-care because of mental or physical disability.

Notification Requirements

When the need for leave is foreseeable, the employee must provide reasonable advance notice – meaning 7 days’ notice when possible – and make an effort to schedule leave so that it does not unduly disrupt company operations.

Request Form

A “Request for Small Necessities Leave Form” must be completed and signed by the employee. This form must then be submitted to the immediate supervisor for proper approval and forwarded to the Human Resources Department. Proof of requested leave will be required upon return.

Military Duty/Leave (USERRA ACT)

Iwaki America will comply with all applicable requirements of the federal law, the Uniformed Services Employment and Re-employment Rights Act of 1994 (“the Act”), and applicable state laws pertaining to military leave.

An employee will be granted a leave of absence for service in the uniformed services, including, but not limited to, the performance of duty on a voluntary or involuntary basis in a uniformed service under competent authority and including active duty, active duty for training, initial active duty for training, inactive duty training, full-time National Guard duty, and a period for which a person is absent from a position of employment for the purpose of an examination to determine the fitness of the person to perform any duty and will be re-employed upon completion of service in accordance with this policy.

Notice of Required Leave

The employee (or an appropriate officer of the uniformed service in which such service is to be performed) must provide advance written or verbal notice of such service to Iwaki America. No notice is required if the giving of such notice is precluded by military necessity or, under all of the relevant circumstances, the giving of such notice is otherwise impossible or unreasonable.

Length of Absence

The cumulative length of absence and of all previous absences from Iwaki America by reason of service in the uniformed services does not exceed five years (certain exceptions apply to this five-year limitation and are set forth in the Act).

Application for Re-employment

Except as provided in the Act, employees will be re-employed, provided the employee applies for re-employment, as follows:

- (1) an employee whose period of service was less than 31 days must report to work no later than the beginning of the first full regularly scheduled work period on the first full calendar day following the completion of the period of service (and the expiration of eight (8) hours of travel), or, as soon as possible after the expiration of such eight (8) hour period, if reporting within the period referred to above is impossible or unreasonable through no fault of the employee.
- (2) an employee whose period of service was for 31 days or more, but less than 181 days, must submit an application for re-employment no later than 14 days following completion of service, or if submitting such application within such time period is impossible or unreasonable through no fault of the employee, the next first full calendar day when submission of such application becomes possible.
- (3) an employee whose period of service was for 181 days or more must submit an application for re-employment within 90 days following completion of service.

The employee, if hospitalized for, or convalescing from, an illness or injury incurred in, or aggravated during, the performance of service in the uniformed services, at the end of the period that is necessary for the employee to recover from such illness or injury, reports to Iwaki America (in the case of an employee described in subparagraph (1) above), or submits an application of re-employment with Iwaki America (in the case of an employee described in subparagraph (2) or (3) above). Such period of recovery shall not exceed two (2) years, except that such two-year period shall be extended by the minimum time required to accommodate the circumstances beyond the employee's control which make reporting within the two-year period impossible or unreasonable. The employee must provide Iwaki America with documentation establishing the timeliness of the application for re-employment and the length and character of the service.

Position upon Re-employment

- (1) If the uniformed service was for less than 91 days, the employee will be re-employed:
 - a. in the position of employment which the employee would have been employed if the continuous employment of the employee with Iwaki America had not been

- interrupted by such service, the duties of which the employee is qualified to perform;
- b. in the position of employment in which the employee was employed on the date of the commencement of the service in the uniformed services, only if the employee is not qualified to perform the duties of the position referred to in subparagraph (a) above after reasonable efforts by Iwaki America to qualify the employee.
- (2) If the uniformed service was for 91 days or more, the employee will be re-employed:
- a. in the position of employment which the employee would have been employed if the continuous employment of the employee with Iwaki America had not been interrupted by such service, or a position of like seniority, status and pay, the duties of which the employee is qualified to perform; or
 - b. in the position of employment in which the employee was employed on the date of the commencement of the service in the uniformed services, or a position of like seniority, status and pay, the duties of which the employee is qualified to perform, only if the employee is not qualified to perform the duties of the position referred to in subparagraph (a) above after reasonable efforts by Iwaki America to qualify the employee.
- (3) The Act contains certain special provisions concerning re-employment positions for an employee who has a disability incurred in, or aggravated during, uniformed service, and who (after reasonable efforts by Iwaki America to accommodate the disability) is not qualified due to such disability to be employed in the position of employment which the employee would have been employed if the continuous employment of the employee with Iwaki America had not been interrupted by such service.

Benefit Rights

An employee who is re-employed under this policy is entitled to seniority and other rights and benefits determined by seniority that the employee had on the date of the commencement of service in the uniformed services plus the additional seniority and rights and benefits determined by seniority that such employee would have attained if the employee remained continuously employed.

The employee will be entitled to such other rights and benefits not determined by seniority as are generally provided by Iwaki America to employees having similar seniority, status and pay who are on leave of absence under a contract, agreement, policy, practice, or plan in effect at the commencement of the employee's uniformed service or established while the employee performs such service.

An employee deemed to be on a leave of absence while serving in the uniformed services shall not be entitled to any benefits to which the employee would not otherwise be entitled if the employee had remained continuously employed.

Iwaki America will comply with the regulations of the Act concerning the employee's eligibility for continued health benefits during the employee's absence while serving in the uniformed services. If the employee performs service in the uniformed services for 31 days or more and elects to maintain his or her health benefits in accordance with the Act, the employee will be

responsible for paying (insert amount which is no more than 102% of the full premium under the health benefit plan associated with coverage for the employer's other employees). If the employee performs service in the uniformed services for less than 31 days and elects to maintain

his or her health benefits in accordance with the Act, the employee will be responsible for paying the employee's portion of the health benefit premiums.

Use of Accrued Vacation

An employee who takes military leave under this policy may apply earned time to the leave if the employee desires; however, the employee is not obligated to do so.

Compensation

Except as otherwise specified in this policy, all military leave will be unpaid leave.

U.S. Military Reserve Duty

Except as otherwise provided in this section, all provisions of this policy apply to reservists. A reservist will be allowed to take time off to fulfill annual encampment, training duty and other official reservist obligations. Iwaki America will pay the difference between the person's military pay and their normal salary for up to 90 work days per year, provided the reservist submits supporting documentation to the Human Resources Department for approval prior to the date of departure for duty leave and submits any service pay received for the same period to Iwaki America. Earned time may be applied for any period of reservist duty for which no salary continuation is provided by Iwaki America but is not required.

REVISION HISTORY

| Rev. | ECO No. | Revision date | Revised by: | Description of Change |
|-------------|----------------|----------------------|--------------------|------------------------------|
| Rev.A | | | | First document |
| Rev.B | | | | Second document |
| Rev.C | 3027 | 7/19/2019 | AF | Refer to ECO for updates |
| Rev.D | 3410 | 7/13/2020 | AF | Refer to ECO for updates |
| Rev.E | | | | |