

Information Handbook for Employees of

SORRENTINO MARIANI & COMPANY

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NOTHING CONTAINED IN THIS HANDBOOK IS INTENDED TO CREATE (NOR SHALL BE CONSTRUED AS CREATING) A CONTRACT OF EMPLOYMENT (EXPRESS OR IMPLIED) OR GUARANTEE OF EMPLOYMENT FOR ANY TERM OR FOR ANY SPECIFIC PROCEDURES. THERE IS NO CONTRACT OF EMPLOYMENT BETWEEN ***SORRENTINO MARIANI & CO.*** AND ANY ONE OR ALL OF ITS EMPLOYEES. EMPLOYMENT SECURITY CANNOT BE GUARANTEED FOR OR BY ANY EMPLOYEE.

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Foreword

We believe in keeping employees fully informed about our policies, procedures, practices, benefits, what employees can expect from the company, and the obligations assumed as an employee of **SORRENTINO MARIANI & CO.** This practice is designed to provide fair treatment of employees. All employees are expected to become familiar with the policies, procedures, practices, and benefits of **SORRENTINO MARIANI & CO.** This handbook is intended to provide employees with basic information. The policies and practices described in this handbook reflect a great deal of concern for the people who make it possible for **SORRENTINO MARIANI & CO.** to exist . . . **its employees.**

Nothing contained in this handbook is intended to create a contract (express or implied), or otherwise to create legally enforceable obligations on the part of **SORRENTINO MARIANI & CO.** or its employees.

Because **SORRENTINO MARIANI & CO.** is a growing, changing organization, it reserves full discretion to add to, modify, or delete provisions of this handbook at any time without advance notice. For this reason, employees should check with management personnel to obtain current information regarding the status of any particular policy, procedure or practice. No individual other than the President of **SORRENTINO MARIANI & CO.** has the authority to enter into an employment agreement or any agreement that modifies company policy. Any such modification must be in writing and must be signed by the President of **SORRENTINO MARIANI & CO.**

All employment at **SORRENTINO MARIANI & CO.** is “at will”. “At will” means that both employees and **SORRENTINO MARIANI & CO.** have the right to terminate employment at any time, with or without advance notice, and with or without cause. No one other than the President of **SORRENTINO MARIANI & CO.** has the authority to alter this agreement, to enter into an agreement for employment for a specified period of time, or to make any agreement contrary to this policy, and any such agreement must be in writing and must be signed by the President of **SORRENTINO MARIANI & CO.**

Descriptions of various fringe benefits such as group insurance are summaries only. Should the descriptions in this handbook differ with any formal agreement or document involved, the formal agreement or document shall be considered correct. The policies, procedures, practices and benefits described replace all earlier written and unwritten ones.

Management Philosophy

SORRENTINO MARIANI & CO. pledges to its employees that as long as the affairs of this company are in our hands, the following principles will govern our actions with employees.

SORRENTINO MARIANI & CO. employees and their welfare are very important to the success of our company. Our long-range objective is the continuous development of a growing and prospering business through which both the employees and the company will benefit. Every employee is considered a member of our company team. The success of our company is built upon the recognition of the skills and efforts made by each employee. It is our policy to work with all members of our team in a fair and friendly manner and to treat each team member with dignity and respect.

The management of ***SORRENTINO MARIANI & CO.*** will work continually for the benefit of our present and prospective customers as well as our employees to improve the competitive position of our company. This will enable us to provide excellent jobs for our team members.

General conditions such as safety, cleanliness, and employee accommodations will be evaluated periodically for possible improvement and will always compare favorably with good industry practice. We will be pleased to meet with any employee to discuss suggested improvements in working conditions.

We will devote our best effort to conducting an expanding business within which will prevail an atmosphere of harmony with opportunity for all employees of ***SORRENTINO MARIANI & CO.***

President, **Virgil Richard Mariani**

SECTION 1 EMPLOYMENT



WELCOME TO SORRENTINO MARIANI. OUR PEOPLE ARE OUR GREATEST ASSET.

Section 1 Employment

APPLICATION FOR EMPLOYMENT

All candidates for employment with *SORRENTINO MARIANI & CO.* must fully complete, date, and sign the company's standard employment application form. A resume will not be accepted in lieu of a completed employment application. The application form should be completed in detail and signed by the applicant to verify the accuracy and completeness of previous employment and personal information.

The company may investigate any portion of the requested information and may deny or later terminate the employment of anyone giving false, misleading, or incomplete information.

The completed employment application form will be made part of the personnel file of those applicants accepted for employment. An employment application form completed by an applicant not selected for available openings will be maintained in an active file in the front office for a minimum of twelve (12) months and reviewed as suitable openings occur.

CONFIRMATION OF PREVIOUS EMPLOYMENT

The company, at its discretion, will request information from a prospective employee's previous employers relative to the prospective employee's work record in connection with his/her application for employment.

FEDERAL GOVERNMENT CONTRACTORS OR SUB-CONTRACTORS, OR EMPLOYERS WITH OVER 100 EMPLOYEES ARE REQUIRED TO COMPILE AND MAINTAIN THE COMPLIANCE INFORMATION LISTED IN THIS POLICY.

COMPLIANCE INFORMATION

In order for the company to comply with federal government regulations regarding its practice to employ people without discrimination, it is necessary for the company to compile and maintain detailed information on each formal candidate for employment and those who are hired.

This information will include the candidate's or employee's sex, race, and veteran's status including service in the Vietnam era.

IMMIGRATION AND NATURALIZATION

The U. S. Immigration and Naturalization Service require that the company and candidates for employment provide specific information within three (3) days of commencing employment. Candidates for employment must complete Section 1 of Form I-9 and provide the company with specific documents to establish their identity and employment eligibility.

Identity can be established by providing documentation such as a current state-issued driver's license, a state-issued identification card, or similar document such as a school ID with photograph, voter's registration card, or military service record.

An employment eligibility document is a Social Security card, a birth certificate, or an

immigration document.

***An employee will not be allowed to continue employment
without providing proper identification documents.***

PHYSICAL EXAMINATION

For certain positions or under certain circumstances and after an offer of employment, a physical examination may be required. When a physical examination is requested, a company-appointed physician at the company's expense will conduct the physical examination. Employment and assignment will be conditional pending the receipt of a satisfactory physician's report.

DRUG TESTING

Prospective employees may be required to take a drug test. Any candidate who fails the drug screen will not be accepted for employment or may be terminated due to positive results and may be ineligible for employment consideration for a period of one year. All employees who are involved in a work-related accident will be automatically screened for drugs or alcohol consumption during the initial doctor's visit and evaluation. Random drug testing is conducted by the company.

MOTOR VEHICLE RECORD (MVR) INQUIRY

Prospective employees expected to drive company vehicles must provide the company with current and acceptable motor vehicle driving information. Employment and assignment will be conditional pending the receipt of a satisfactory report from the Division of Motor Vehicles.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

SORRENTINO MARIANI & CO. was built upon teamwork and equal opportunity. We will continue to be successful when people are treated fairly and allowed to advance and achieve their full potential. We are proud of the fact that we extend equal employment opportunities to all qualified employees and applicants for employment without regard to race, color, religion, sex, age, national origin, or disability, which if needing accommodation, may be reasonably accommodated as required by law.

We work hard at ***SORRENTINO MARIANI & CO.*** to promote the fulfillment of human potential and equal employment. We will take action to ensure that all qualified minority group individuals, women, disabled persons, and disabled or Vietnam Era veterans are given the opportunity to know of openings, are encouraged to seek promotions, are considered for promotion opportunities, and, when qualified, are hired or promoted.

All phases of employment including, but not limited to, recruiting, hiring, selection for training, promotion, demotion, discipline, rates of pay or other compensation, transfer, layoff, termination, recall, use of all facilities, and participation in all company-sponsored activities, will be administered so as to further the principle of equal employment opportunity.

AFFIRMATIVE ACTION PLAN

(Applies to companies engaged in large Federal contracts and/or sub-contracts)

SORRENTINO MARIANI & CO. shall continue to base decisions on employment so as to further the principles of equal employment opportunity by hiring and employing qualified, reliable, productive employees without regard to race, color, religion, sex, age, national origin, veteran's status, and mental or physical disability. In order to implement this policy, the company has adopted an affirmative action program.

SORRENTINO MARIANI & CO. will cooperate with federal, state, or local government agencies that have the responsibility of observing our actual compliance with various laws relating to employment. The company will furnish such reports, records, and other matters as requested in order to foster the program of equal opportunity for all persons regardless of race, color, religion, sex, age, national origin, disabled or Vietnam Era veteran status, or physical or mental disability.

The company has a designated Equal Employment Opportunity Officer. The Equal Employment Opportunity Officer is responsible for coordinating all aspects of the Equal Employment Opportunity process to assure non-discrimination and compliance with all applicable orders and guidelines. Questions and/or complaints concerning equal employment opportunity should be directed to the company's Equal Employment Opportunity Officer.

EMPLOYMENT PROVISIONS OF THE AMERICANS WITH DISABILITIES ACT (ADA) *(APPLIES TO EMPLOYERS WITH 15 OR MORE EMPLOYEES)*

Title I of the Americans With Disabilities Act prohibits discrimination in any terms or conditions of employment for qualified individuals with a disability.

The Americans With Disabilities Act requires that employment decisions be based on the ability of a person to perform the essential functions of a job and not the person's disability or limitations.

Further, it requires management to reasonably accommodate individuals with disabilities when necessary.

To comply with the employment provisions of the Americans With Disabilities Act, **SORRENTINO MARIANI & CO.** will:

- Identify the essential functions of a job;
- Determine whether a person with a disability, with or without accommodation, is qualified to perform the duties; and,
- Determine whether a reasonable accommodation can be made for a qualified individual.

CATEGORIES OF EMPLOYEES

Employees are divided into the following categories for the purpose of compensation and benefits. Company policies apply to all categories of employees.

FULL-TIME

Employees hired full time (40 hours or more) on a full workweek basis for a continuous and indefinite period of time are considered full-time employees for all

compensation and benefit purposes.

PART-TIME

Employees whose work schedule is less than full time (less than 32 hours) on a full workweek basis for a continuous and indefinite period of time are considered part-time employees for all compensation and benefit purposes. Part-time employees are eligible for some benefits by specific reference only.

TEMPORARY

Employees hired as temporary replacement for full-time or part-time employees, or for short periods of employment such as summer months, peak periods, and vacations are considered temporary employees. Temporary employees are not eligible for benefits regardless of the number of hours or weeks worked.

NON-EXEMPT FROM FEDERAL WAGE AND HOUR LAW

Non-exempt employees are expected to confine their work to the normal workday and workweek unless the company President or Plant Manager authorizes overtime in advance. Non-exempt employees will be paid overtime for all authorized hours worked in excess of 40 (forty) hours per week.

EXEMPT FROM FEDERAL WAGE AND HOUR LAW

Persons who are employed in an administrative, executive, sales, or professional category are specifically exempted from the Federal Wage and Hour Law. The hours worked by these exempt employees are often irregular and begin and end outside the normal workday. Therefore, exempt employees are excluded from the overtime provisions of the Federal Wage and Hour Law and do not receive overtime pay.

BENEFIT ELIGIBILITY

The term "eligible employee(s)" used in Section 3 - Benefits of this handbook refers to full-time employee(s) unless otherwise designated. Each employee will be advised of the status of his/her position when he/she is hired.

- Full-time employees are entitled to the benefits stated in this handbook provided they qualify for each individual benefit.
- Part-time employees are entitled to those employee benefits specifically designated.
- Temporary employees are not eligible for benefits.

ORIENTATION

Following the acceptance of employment, a member of management will discuss job duties and areas of responsibility with a new employee. Company policies and procedures will also be reviewed. A copy of the Information Handbook for Employees will be available for the new employee to read and review.

After reviewing the handbook, the employee must sign a statement acknowledging his/her understanding of the information contained in the Information Handbook for Employees. This statement must be witnessed by the department lead man or plant manager or office supervisor and must be returned to the Accounting Department within seven (7) days of commencement of employment. This signed/witnessed copy of the statement will become part of the employee's

personnel file.

A copy of the Information Handbook for Employees will be available for future reference for all employees.

EVALUATION PERIOD

During the first 90 days of employment, *SORRENTINO MARIANI & CO.* and each new employee are given an opportunity to evaluate whether the employment relationship should continue.

Before the end of this 90-day period, the employee's performance will be evaluated. The employee will be notified of future employment by his/her immediate supervisor or line leader. During the evaluation period, an employee may voluntarily terminate employment without notice, or if the performance of the employee is not satisfactory as determined by *SORRENTINO MARIANI & CO.*, the employee may be released with or without notice.

The completion of the evaluation period should not be considered as a guarantee of permanent employment. *SORRENTINO MARIANI & CO.* evaluates employees on a continuing basis and reserves the right to terminate an employee at any time during or after the evaluation period.

PAYROLL INFORMATION

Following the acceptance of employment, each new employee will be given federal and state tax forms to complete. The completed forms, the employment application form, and information regarding starting pay, starting date and any other pay or benefit information will be forwarded to the Accounting Department. Within 48 hours of acceptance of a job the employee must furnish the Accounting Department two forms of identification, one of which must be a picture ID.

CONTINUOUS SERVICE DATE

So that the company can maintain a record of the benefits for each employee, a continuous service date will be established for each full-time employee. The continuous service date will be the employee's first day of employment and will continue uninterrupted as long as he/she remains a full-time employee of *SORRENTINO MARIANI & CO.*

EMPLOYMENT OF RELATIVES

The company discourages the employment of close relatives because it is not considered sound business practice. However, under certain conditions, management may waive this policy in favor of employing close relatives within the organization.

Close relatives are defined as: spouse, mother, father, son, daughter, brother, sister, grandparent and in-laws.

EMPLOYMENT OF MINORS

The following provisions apply with respect to the company's age requirements:

- The company will fully comply with the Child Labor provisions of the Fair Labor Standards Act and applicable state statutes that govern the employment of minors.

- For purposes of insurance risk, it is the company's policy to discourage the employment of individuals younger than age 18 in any position with the company. No one under the age of 18 may be employed in any capacity involving machine work. Applicants under the age of 18 may be considered for office positions. In any case involving the hire of a person under the age of 18, a written release must be secured from a parent or guardian in advance of the person's start date.
- Should the company have any reason to question whether an individual applicant is under age 18, the applicant may be required to furnish proof of birth date.

EMPLOYMENT-AT-WILL

We hope that each employee's period of employment at *SORRENTINO MARIANI & CO.* is a rewarding experience. However, we recognize that circumstances change with the passage of time and that some employees may seek opportunities elsewhere or choose to leave the company for other reasons. Other employees may not fulfill the operational needs of the company or changed circumstances may reduce available employment opportunities that may result in involuntary terminations.

We sincerely hope that none of these situations occur, but realistically we have to acknowledge that the possibility does exist. Therefore, the right of the employee or the company to terminate the employment relationship "at will" is recognized and affirmed as a condition of employment.

"At will" means that both employees and *SORRENTINO MARIANI & CO.* have the right to terminate employment at any time, with or without advance notice, and with or without cause.

EMPLOYEE INFORMATION

Employees are asked to help keep the company informed about any major change that may affect their employment status. Important changes to report include:

- Name
- Address
- Home telephone number
- Marital status
- Number of dependents
- Emergency telephone numbers and whom to notify in case of emergency
- Change of beneficiary
- Authorized payroll deductions
- Additional education and special training courses

PERSONNEL FILES

SORRENTINO MARIANI & CO. will maintain a file on each employee. An employee's personnel file begins with his/her completed employment application form. From time to time information will be added to this personnel file regarding an individual's employment status with the company. Personnel files are the property of *SORRENTINO MARIANI & CO.* and will be treated the same as any other confidential company information.

The following provisions apply with respect to the company's standards for establishing, maintaining, and handling employee personnel files:

- All official records concerning an employee will be kept up to date insofar as possible and all employees shall promptly report all pertinent personal information and data changes to the Accounting Department.
- Employees will be permitted to review their personnel files as permitted by applicable laws.
- Information regarding the medical condition or history of an employee will be kept confidential with restricted access.
- The personnel file of an employee terminating employment will be maintained in accordance with applicable state and federal laws.

CONTENTS OF PERSONNEL FILES

Employee personnel files may include the following:

- a) Original employment application, and two forms of ID
- b) I-9 Form
- c) Performance appraisal reports
- d) Disciplinary action notices
- e) Special commendation information
- f) Educational achievement records
- g) Status changes affecting employee's work and salary history
- h) Employee's resume (if submitted)
- i) Signed/Witnessed copy of the Acknowledgment of Receipt and Understanding
- j) Other relevant documents as determined by the President.

EMPLOYEE'S REQUEST FOR REVIEW OF PERSONNEL FILE

The following provisions apply with respect to an employee's request to review his/her personnel file:

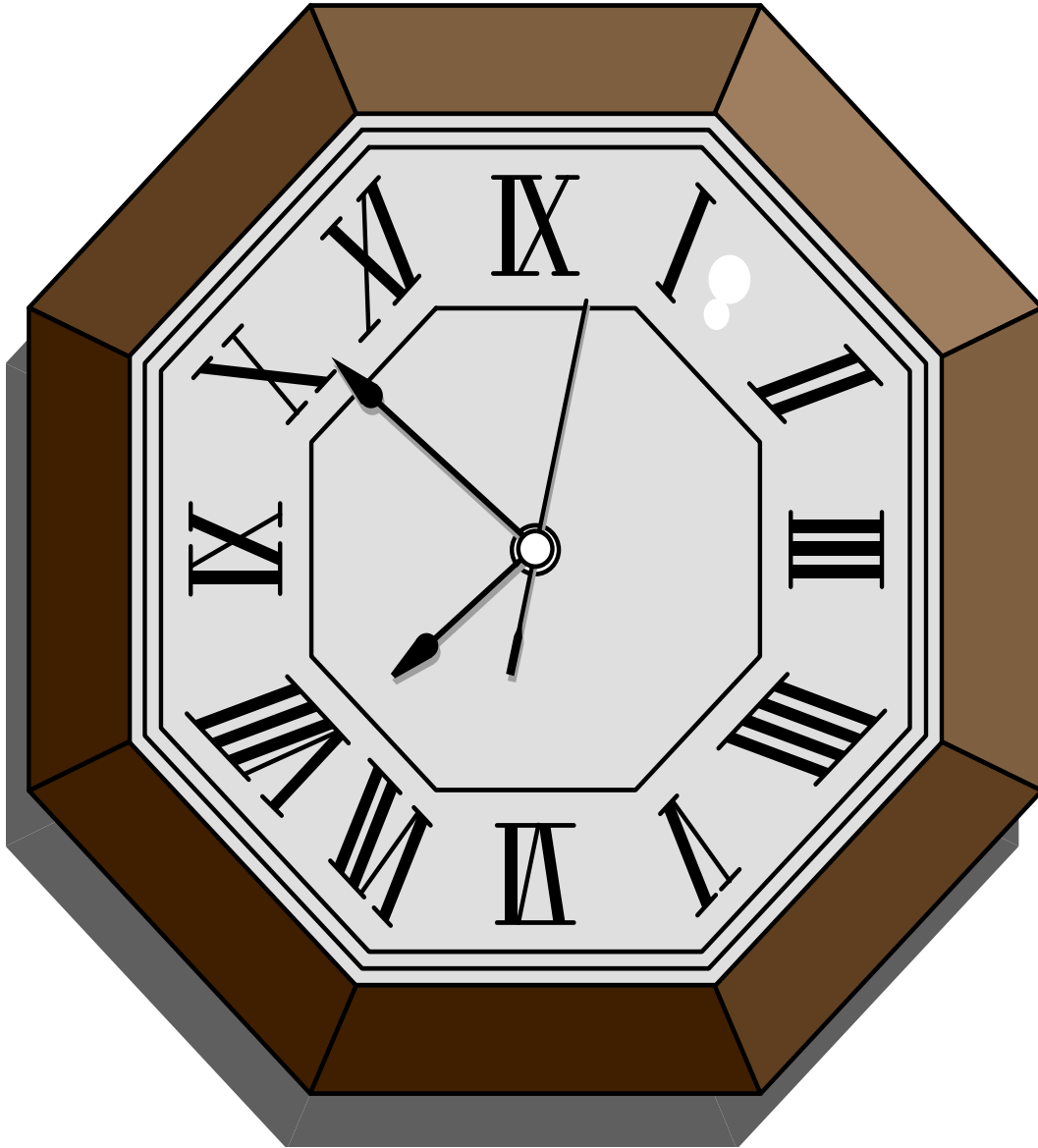
- The Accounting Department will have the responsibility of coordinating the review of an employee's personnel file with the employee's immediate supervisor.
- A member of the Accounting Department staff must be present while the employee reviews his/her personnel file.
- The employee may take notes, but may not remove, deface or otherwise make notations on the documents in his/her personnel file.
- Upon request from the employee, the company will provide a copy of any item(s) in the employee's personnel file.

MANAGEMENT'S REVIEW OF PERSONNEL FILES

All information in employee personnel files is considered confidential. This information will only be available to the Accounting Department, the employee, senior management personnel, and supervisors or managers who are responsible for the employee. Any violation of this policy is considered a very serious offense.

One exception will be in a transfer situation where the supervisor of the department to which an employee may be transferred will be allowed to review the employee's file with the approval of the President and the employee's immediate supervisor.

SECTION 2
WORKING HOURS AND PAY



TIME AND MONEY GO HAND IN HAND; YOU CONTROL YOUR DESTINY

Section 2 Working Hours and Pay

WORKING HOURS

The company's workweek begins at 8:00 a.m. Thursday and ends at 5:00 p.m. Wednesday. Regular working hours are as follows:

Office: 8 a.m. to 5 p.m. daily (Monday through Friday), with a one (1) hour lunch break

Factory: 8:00 a.m. to 4:45 p.m. daily (Monday through Friday), with a forty-five (45) minute lunch and two (2) ten (10) minute personal breaks. (Absence from the line for any factory employee without notifying your direct supervisor or line leader will be cause for a reprimand that will be placed in your permanent file.) **WORKING HOURS ARE SUBJECT TO CHANGE BASED ON PRODUCTION NEEDS.**

Each employee is expected to complete a normal workday and work week and work whatever reasonable additional hours are required to meet company needs. All employees must check with their direct supervisor or line leader before clocking out to ensure they are not needed for any last minute assignments.

The Plant Manager or Line Leader will inform employees of scheduled break and/or lunch periods. Employees are expected back at their workstations ready to start work at the end of each scheduled break and/or lunch period. If overtime is required, employees will be expected to work any additional time necessary.

WASH UP, CLEAN UP

Because this company is engaged in manufacturing operations, it is imperative that good housekeeping is practiced in all work areas. The company mandates that the factory is clean and organized at all times. Employees are required to clean and organize their working area each day before they clock out. Food and drink are not allowed on the factory floors. Food containers and wrappings are not allowed on the factory floor. Personal items such as handbags, lunch boxes, coats and hats are not allowed on the factory floor. We have a limited number of lockers available. If you have an item that needs to be kept in a secure area please see the Tool Room attendant to make arrangements to have it secured in the cage. Sorrentino Mariani is not liable for the loss of personal items. Please only bring what is necessary with you to work.

OVERTIME

Employees will be expected to work overtime in case of emergency or whenever necessary in the best interests of the company. If determined necessary, management beyond an employee's standard workweek will authorize overtime work. Non-exempt hourly-paid employees will be paid one and one-half (1½) their regular rate of pay for approved overtime hours worked in excess of forty (40) hours per week. **Pay for holiday and/or vacation time not actually worked is not considered when computing overtime.**

Pay Schedule

Personnel are normally paid on Friday at the end of the scheduled working day for work performed Thursday through Wednesday of the same week. Paychecks will not be issued prior to this time regardless of an approved absence, vacation, leave or termination of employment. Any employee who requests that a paycheck be picked up by a person other than themselves must request so in person or with a signed written note on the day the check is to be picked up

TIME RECORDS

Government regulations require that the company keep an accurate record of hours worked by employees. Employees are required to punch in when they report to work and punch out when they leave. Employees are required to punch out for lunch and when they return. Employees must punch in no earlier than two minutes prior to their starting time and punch out no later than two minutes after their scheduled workday has ended unless approved by the appropriate Line Leader or the Plant Manager.

All time for hourly employees is based on the Time Clock, and is measured in 15-minute increments. Time will begin on the quarter hour after an employee clocks in both in the morning and upon returning from lunch, and will end on the quarter hour before an employee clocks out for lunch and at the end of the workday. Any employee who is late for work either in the morning, or upon returning from lunch, must report to the Personnel Office before they clock in. All late punches will default to the next quarter hour.

It is a violation of company policy for one employee to punch another employee's timecard, or to alter his/her own time card or that of another employee.

If an employee has a question concerning his/her timecard, he/she should discuss the matter with his/her Line Leader, or Plant Manager. All changes or hand written entries on your timecard must be initialed by your Line Leader and then again by the Plant Manager prior to being submitted to accounting to calculate payroll checks.

Please check your time card daily for accuracy. Sorrentino Mariani strives to properly calculate all time cards. Most errors are due to failure to punch in or out by the employee, or by improper punching of the time clock. If there are any discrepancies or wrong entries on your card please address it before the end of the workweek. Your line leader or direct supervisor can address most issues.

It is the responsible of each employee to be sure they are clocking in and out at the appropriate times. It is not Human Resource's or Accounting's responsibility to correct errors in punches while in the process of completing payroll. If you believe, you have forgotten to clock in or out bring this to the attention of your Supervisor or Human Resources immediately.

If you feel you have been shorted on your paycheck for hours worked after you receive your paycheck, you must address it directly with your supervisor **on the following full workday.** Errors will not be corrected on the Friday checks are issued.

ATTENDANCE

Your timely attendance at work is crucial to making the business run smoothly. We must meet production requirements to satisfy our customer's demands. You need to do your part in achieving this goal, and one way is to maintain a good attendance record. Any absence or tardiness becomes a part of your employment record.

Point System

The following is how each absence and tardy will be accounted for:

- A schedule absence will be counted as one half of a point.
- An unscheduled absence will be counted as one point.
- Request for time off (RTO) will be counted as one half of a point.
- A no call / no show will be counted as three points.
- An absence for one or more consecutive workdays will be considered only one point if proper documentation is provided. For example, if you are out two consecutive days and bring a doctors note, it will count as one point.
- Tardiness is defined as being at your work station at least one minute past your scheduled starting time and will be counted as a half point.
- One point will be subtracted from your balance for every two consecutive months you maintain perfect attendance. Perfect attendance is considered not having any scheduled or unscheduled absences, tardiness, or requests for time off.

This point system will be ongoing throughout the time of your employment. The company will not start your points over every year. However consideration will be given to length of service. The point break down will be as follows:

- 4 points – Verbal warning (documented)
- 7 points – Written warning
- 10 points – Suspension for one day
- 13 points – Up to and including termination

Procedure

In the event that you are unable to come to work, be sure to call in and let the appropriate person know, in advance where possible, but no later than your regular starting time, so that arrangements for other help can be made.

Absence of three or more consecutive scheduled working days without notifying the appropriate person will be considered as a voluntary termination, and you will be removed from the payroll.

Requested-Time-Off (RTO)

All RTO forms are to be turned in to your supervisor SEVEN days prior to the requested day(s) off. Any RTO not turned in within the seven days prior to the RTO will not be approved. Exceptions will be at the discretion of the company. All employees are required to verify with the Human Resource office if the RTO has been approved. RTO's are normally processed in two working days.

Tardiness

Employees are expected to be at their work stations on time. An employee that clocks in one or more minutes past their scheduled starting time is considered tardy. You should notify the appropriate person when you know you may be late for work. Being on time makes it easier for all of us because tardiness hinders teamwork among employees.

Documentation

We will require documentation of authorized reasons for absence, and may also verify the documentation where appropriate.

Anytime an employee is absent or request time off, documentation must be provided the following day and turned in to the HR department during a scheduled break. Documentation is defined as any written proof for reason of absence.

FAMILY EMERGENCY

In the event the Office receives word of an emergency related to a member of an employee's family, the employee would be notified as soon as possible. Should the employee be at a location away from his/her normal workplace, arrangements will be made to contact the employee, and if necessary, arrange for the employee to return home immediately. Any employee abusing the Family Emergency leave policy may be verbally reprimanded with written notice placed in the employee's personnel file or suspended for TWO working days without pay.

FAMILY MEDICAL LEAVE ACT (FMLA)

Employees are **eligible for up to 12 weeks of unpaid, job-protected leave per year** if they have worked for their employer at least 12 months, at least 1,250 hours over the past 12 months, and work at a location where the company employs 50 or more employees within 75 miles.

The 12 month period in which the employee is entitled to 12 weeks of FMLA leave is defined as a 12 month period measured forward from the date any employee's first FMLA leave begins.

Where a husband and wife are employed by the same employer, the aggregate leave permissible for birth, adoption, foster placement or care of a close relative may be limited to 12 weeks during any 12 month period. No such limitation is placed on leave for an employee's personal serious health condition.

The FMLA does not require an employer to pay the employee during the allowable leave period. However, **the employee may elect to use accrued paid vacation leave as part of the FMLA leave.** Alternatively the employer may require the employee to use that accrued paid vacation leave during the 12 week leave period.

Under the FMLA, an employer always must maintain the employee's existing level of coverage (including family or dependent coverage) under a group health plan during the period of FMLA leave, **provided the employee pays his or her share of the premiums.**

Items covered under FMLA are:

- The birth and care of the newborn child of an employee;
- For placement with the employee of a child for adoption or foster care;
- To care for an immediate family member (spouse, child, or parent) with a serious health condition; or
- To take medical leave when the employee is unable to work because of a serious health condition.

Where the need for FMLA is foreseeable based on an anticipated date of the event, the employee must provide the employer with **written request no less than 30 days prior to the qualifying event**. If the qualifying event is to take place in less than 30 days, the employee is obligated to give the employer as much notice as is practicable. The employer has an obligation to inquire further to determine if the leave is FMLA eligible. The employee has an obligation to furnish the employer with sufficient information to enable the employer to determine whether the leave qualifies under the FMLA.

REQUEST FOR TIME OFF (RTO)

In order to ensure that you receive requested time off, you must fill out a Request for Time Off form. Forms must be complete with your manager's and the plant manager's signature, and turned into the Human Resource Department **seven (7) days prior to date requested in order for the time off to be approved**. Forms can be found by the time clock or in the Human Resources Department. This time off will be considered unpaid leave. In some cases, your request may not be approved or be approved with condition such as having to make up the time lost at the discretion of the company. If you fail to make up the time when asked to do so, it will count as points against you. Furthermore, if time off is not approved, you will still receive points if you are absent that day, even if you have turned in the appropriate documentation.

SEVERE WEATHER CONDITIONS

If there is any question regarding hours of work during severe weather conditions, employees are responsible for contacting the office regarding opening and closing hours.

PERFORMANCE EVALUATIONS

Management will evaluate the performance of employees periodically. The evaluation consists of a personal interview during which an employee's strengths and weaknesses are discussed and evaluated and recommendations for improvements are made. These interviews also identify the short and long-range goals of employees and determine how they interrelate with the company's purpose and objectives.

Any recommendations for promotion, change of duties, or pay increase must be approved by the President before any change takes effect. A performance evaluation does not necessarily mean a change in pay or duties. Pay is set and changed after consideration of the cost of living, company finances, and past performance of an employee.

ADVANCEMENT

SORRENTINO MARIANI & CO. believes in promoting from within the company. We want employees to have the opportunity for promotion to higher paying positions within the company. A promotion will be based on such factors as quality and quantity of work, prior job

performance, experience, educational background, attendance record, safety record, and the ability to work well with others.

We reserve the right to look outside the organization if we feel that an employee with the best qualifications cannot be found within the organization.

PAYROLL DEDUCTIONS FROM GROSS PAY

The company will make arrangements for payroll deductions for the following:

- Federal income taxes
- State income taxes
- Social Security taxes
- Past due taxes
- Garnishments (including child support) or other court ordered wage deductions plus \$5 admin fee per garnishment
- Employee's portion of group insurance premiums
- Employee's portion of group insurance premiums for coverage on eligible dependents
- Uniforms
- Tools or equipment
- Loss, damage, or destruction of company property
- Charitable contribution

The employee must authorize any deductions other than statutory deductions. No other deductions will be made unless specifically authorized in writing by the employee. All deductions will be itemized on the employee's paycheck stub. Questions regarding payroll deductions should be directed to the Accounting Department.

ERROR IN PAY

The company takes precautions to ensure that employees are paid correctly; however, if an error does occur, the employee should notify his/her supervisor. The company will make every attempt to adjust the error no later than the employee's next regular pay period. If you feel you have been shorted on your paycheck for hours worked after you receive your paycheck, you must address it directly with your supervisor **on the following full workday.** Errors will not be corrected on the Friday checks are issued.

GARNISHMENT OF EMPLOYEE WAGES

Garnishments are court orders requiring an employer to withhold specified amounts from an employee's wages for payment of a debt owed by the employee to a third party. State law requires the company to honor garnishments of employee wages (including child support) as a court or other legal judgment may instruct.

The law also provides for an administrative fee to be charged when a garnishment occurs. Due to the time and expense incurred with bookkeeping and mailing, a \$5.00 fee will be assessed per garnishment transaction.

AUTHORIZED CHECK PICKUP

If an employee is absent on payday and instructs someone to pick up his/her paycheck, a note signed by the employee authorizing the person must be provided before the check can be released. The person picking up the paycheck must show proper identification and sign for the

check. This policy protects both the employee and the company.

PAY ON SEPARATION FROM EMPLOYMENT

Employees separated from employment will be paid for time worked (less deductions) on the next regular pay day according to the applicable federal and state laws.

ADVANCES AND LOANS

SORRENTINO MARIANI & CO. will not advance money to employees against wages nor will the company loan money to employees.

**SECTION 3
BENEFITS**



HARD WORK PAYS OFF IN MULTIPLE WAYS

Section 3

Benefits

The company provides a well-balanced program of benefits designed to meet the needs of

employees and provide protection from financial hardship. These benefits will be reviewed periodically to ensure that they keep pace with area practice.

The information contained in this handbook regarding employee benefits is not a contract to provide these benefits to any employee. The eligibility requirements of these benefits are described in the summary plan documents and/or benefits booklets.

Full-time employees are eligible for benefits provided by the company if they meet specific requirements.

At the present time, *SORRENTINO MARIANI & CO.* pays for a portion of the cost of the benefits. Be sure to keep information regarding any change to the handbook. Questions concerning benefits and/or insurance claim information should be directed to the Accounting Department.

The terms of the benefit plans described are subject to change at any time by the insurer(s) or *SORRENTINO MARIANI & CO.*

VACATION ELIGIBILITY

The company recognizes that employees need a scheduled time away from normal work duties for their personal well being. The company grants annual vacation with pay to full-time employees who meet the following service requirements:

Length of Cumulative Service	Eligible Vacation
One to Two Years	5 working days
Three or more Years	10 working days

If there is a break in service due to an employee electing to leave the company for any reason (Quitting, shift from full to part time, not returning from an approved leave of absence, etc.), it will be up to the owners of the company to decide if the employee is rehired with cumulative service restored or not.

VACATION SCHEDULES

Employees must submit their vacation request form to their Supervisor at least **30 DAYS IN ADVANCE (no exceptions)** of their requested vacation date. If the requested time is not available the request will be denied and another time frame must be chosen. If vacation is not requested in the proper amount of time then the vacation **will not** be approved. Employees who need to change their requested dates after the vacation schedule has been set will lose their seniority consideration. After one (1) calendar year of service is complete your vacation time will be reinstated on the day following your anniversary date (date of hire). Vacation may be taken at any time during the year including plant shutdowns, and layoffs after eligibility with the following provisions:

- Years of service are calculated by an employee's date of hire.
- An employee will be eligible to take vacation starting from their anniversary date of hire up until the day they reach another anniversary year.

- Vacation eligibility will also be based on an employee working a minimum of 2,000 hours by their anniversary date.
- Employees are expected to take their paid vacation time as a means of rest and diversion for themselves and their families.
- The Plant Manager and Controller must approve vacations in advance.
- No department is allowed to have more than two (2) employees on vacation at any given time with the exception of special circumstances.
- Supervisors and line leaders are not allowed to take vacation at the same time.
- A holiday observed by the company that falls during the vacation period will be considered as a paid holiday and not vacation time. This day of vacation may be taken at another time as approved.
- All hourly and salaried employees must work all scheduled hours/days during the week (pay period) of their vacation or the holiday, and must work the regularly scheduled hours/days before and after the holiday or vacation in order to be paid.
- Job requirements will always have precedence over vacation schedules.
- Length of service (seniority) will be considered in the event a conflict of vacation schedules arises.
- Employees who are entitled to a vacation of two weeks or less may take their full vacation at one time at the discretion of the Plant Manager and Controller.
- Vacations less than a full day (8 hrs.) will not be granted.

VACATION PAY

The following provisions apply with regard to vacation pay:

- Pay for vacation time will be at the employee's base rate of pay.
- Paid vacation time will not be considered as time worked for the purpose of computing overtime.
- Pay in lieu of unused vacation at any time will be provided only at the convenience of the company when approved in advance by the President, and, upon separation from employment under certain conditions.

OBSERVED HOLIDAYS

The company normally recognizes the following paid holidays; however, the company may decide to work on a holiday depending upon job requirements.

New Year's Day
 Memorial Day
 Independence Day
 Labor Day
 Thanksgiving Day
 Christmas Day

The following provisions apply with regard to holidays observed by the company:

- If a holiday falls on a Saturday or Sunday, its observance will be at management's discretion.
- To be eligible for holiday pay, an employee must first complete Six (6) months of continuous employment.

- All hourly and salaried employees must work all scheduled hours/days during the week (pay period) of their vacation or the holiday, and must work the regularly scheduled hours/days before and after the holiday or vacation in order to be paid.
- Paid holiday time will not be considered as time worked for the purpose of computing overtime.
- **Should the company decide to be closed the day before or after a holiday it is left up to their discretion whether hourly and/or salaried employees will be paid for that day.**

GROUP HEALTH INSURANCE AND DENTAL INSURANCE

Group health insurance is available to all full-time employees. Coverage will become effective on the 1st day of the following month with two (2) months of continuous employment for health insurance and six (6) months continuous employment for dental and vision insurance.

At the present time, the company pays 50% of the employee's cost of coverage for health insurance only. The employee pays the other 50% of their coverage, plus the full amount of the cost of coverage on their eligible dependents. Employees who want to include coverage on their eligible dependents may do so by indicating this choice on the group health insurance enrollment form. The dental and vision plans are voluntary and employees pay 100% of the cost.

As health care costs continue to rise, the company will attempt to provide suitable health coverage to its employees. However, when necessary, the company reserves the right to change the portion paid by employees for health insurance premiums.

If an employee previously covered by the company's group health insurance plan is laid off because of temporary lack of work or illness and is rehired within three (3) months of the layoff, the employee will become eligible to participate in the company's group health insurance plan based on the health provider's criterion.

The insurance carrier will provide eligible employees with a detailed summary of the insurance coverage provided.

CONTINUATION OF GROUP HEALTH INSURANCE (COBRA)

Note: Continuation (Cobra) Applies To Companies With 20 Or More Employees.

Employees

- Employees terminated for reasons other than gross misconduct may continue group health insurance coverage for up to eighteen (18) months, or twenty-nine (29) months if disabled at the time of termination, at their own expense.
- Employees whose work hours are reduced to a point where they are ineligible for coverage may also continue coverage for up to eighteen (18) months, or twenty-nine (29) months if disabled at the time of termination, at their own expense.
- COBRA notification, costs, application, and procedure information will be mailed to the employee when applicable.
- The employee must notify the Human Resources/Finance Office in writing of his/her intent to continue coverage within sixty (60) days of notification and must pay the premiums according to the premium schedules.
- Failure to notify the HR/Finance Office in writing, or to pay premiums, is considered notice of cancellation of this option.

Dependents

- A dependent no longer eligible for coverage under the employee's group insurance certificate due to employee's death, a divorced or legally separated spouse, or a child ceasing to be a dependent, may continue group health insurance for up to thirty-six (36) months at the expense of the employee or dependent.
- The dependent must notify the Office in writing of his/her intent to continue coverage within sixty (60) days of notification.
- Failure to notify the Office in writing or pay premiums is considered notice of cancellation of this option.

EDUCATIONAL ASSISTANCE

The company encourages all full-time employees to be more effective on the job and to increase their career potential within the company by voluntary participation in job-related classes, continuing education programs and/or professional seminars outside regular working hours. The company feels employee development is advantageous to both the company and the employee.

With prior approval from management, the company will reimburse a percentage to eligible employees with one or more years of continuous service for the cost of job-related classes/seminars (up to \$ 500.00 in a calendar year) upon successful completion according to the following schedule:

Final Grade	Eligible Reimbursement
A	100%
B	80%
C	60%
D	0%
F	0%

If an employee attends a job-related class/seminar that requires an overnight stay, reimbursement for lodging and/or meal expenses will be made according to previously established guidelines. Receipts along with a properly completed Expense Report are required at the time the reimbursement is requested.

Any cost to attend a seminar will be paid directly by the company before the employee attends. If the employee fails to attend a seminar, the cost to attend the seminar or any cancellation fee incurred will be at the expense of the employee.

Employees requesting educational assistance must comply with the following conditions:

- Employee must submit a written request for educational assistance to the President listing the name of the school, a description of the course, tuition cost, scheduled time, and whether or not the employee is working toward a degree.
- Employee must be employed full time by the company at the time the reimbursement is paid.
- Upon successful completion of the course, the employee must submit all receipts for books, tuition, student fees, etc., along with a copy of the final grade received to The Accounting Department for review before reimbursement.
- Reimbursement for educational assistance will not be made if the course is dropped, failed, or in any way not completed, or if the employee ceases to be employed by the company for any

reason.

- Reimbursement will not be made by the company if the employee is receiving payment for course(s) by grant or scholarship from other sources, for example, the G.I. bill.
- The President of Sorrentino Mariani & Company, Inc. will give final approval for all educational assistance.
- Any special cases or situations not listed above will be at the discretion of the President of the Company.

VOTING

The company encourages its employees to vote in every election; however, we do not provide time off for voting with or without pay. Employees should make arrangements to vote prior to or following normal work hours.

FUNERAL LEAVE

In the event of a death in an employee's immediate family, the employee will be allowed up to 3 days off without pay in order to assist with arrangements or to attend the funeral. If additional time is necessary, vacation time may be used provided the employee is eligible for vacation time. Immediate family is considered: spouse, parent, stepparent, child, stepchild, brother/sister, stepbrother/sister, grandparent, grandchild, and in-laws.

Prior approval for any funeral leave must be obtained from The President of the Company. The company reserves the right to request substantiation of any death in an employee's immediate family and/or confirmation of an employee's attendance at a funeral.

SICK LEAVE

The company provides no sick leave.

MEDICAL ABSENCES

The company reserves the right to request an explanatory note from the employee's physician should an absence extend three (3) or more consecutive working days due to a non-job-related illness or injury.

When an employee is absent from work for more than ten (10) consecutive working days, management will review the situation to determine if there is a need to fill the position in the individual's absence.

Absence due to pregnancy, childbirth, and related medical conditions will be treated the same as any other non-pregnancy-related illness or disability.

Medical absences for periods in excess of 4 weeks (20 working days) are at the discretion of management and may be denied, approved on conditions that are necessary to the company's interests, or approved outright. The status of an employee's position and benefits during and at the conclusion of any such extended medical absence will be determined by management and communicated to the employee before or at the time the absence is granted.

MATERNITY LEAVE

It is the policy of *SORRENTINO MARIANI & CO.* to allow maternity leave without pay up to six (6) weeks with the following provisions:

- The determination of the beginning and ending dates of the employee's absence will be a joint decision between the employee, the employee's attending physician and the employee's supervisor.

- Before commencing maternity leave without pay, the employee must use all earned annual leave.
- The employee may return to work within a specified period of time after commencement of maternity leave without pay providing that the employee has medical approval. This period of time can be extended upon medical recommendation if approved by the company and at its discretion.
- If the employee returns to work within the specified time period or as soon as medically approved thereafter, the employee will be reinstated to the position held prior to the leave or a position of equivalent status and pay.
- A medical release from the employee's attending physician is required upon return to work.
- If the employee does not return to work within the specified number of days or as soon as medically approved thereafter, the policies governing leave of absence without pay will apply.

MILITARY LEAVE

It is company policy to grant a leave of absence without pay to employees who participate in U. S. Armed Forces Reserve or National Guard training programs in accordance with the provisions of the Universal Military Training and Service Act.

SOCIAL SECURITY

The cost of Social Security is shared between employees and the company. For every dollar an employee puts into Social Security, *SORRENTINO MARIANI & CO.* puts in a dollar.

Social Security provides benefits for employees and their families as specified by law in the event of retirement, hospitalization after age 65 (Medicare), total and permanent disability before age 65, and death at any time. Contact the local Social Security Office for details.

WORKERS' COMPENSATION

Employees of *SORRENTINO MARIANI & CO.* are covered by Workers' Compensation insurance, which is purchased by the company in the state in which it operates. This insurance provides compensation to an employee for lost wages caused by illness, accidental injury, or death suffered in the course of or as a result of his/her employment with the company in accordance with the laws of the state of Virginia.

Eligibility

Eligibility for benefits under Workers' Compensation insurance is automatic and is effective on date of hire.

Reporting

A report must be filed within 24 hours of the onset of illness or injury.

Benefits

Workers' Compensation benefits provide weekly payments based upon a statutorily specified amount of the employee's regular earnings as well as payments for medical and hospital expenses arising out of an occupational illness or injury.

Effect on Continuous Service Date

Any time lost by an employee due to an occupational illness or injury covered by Workers' Compensation insurance will be credited as active service for all company

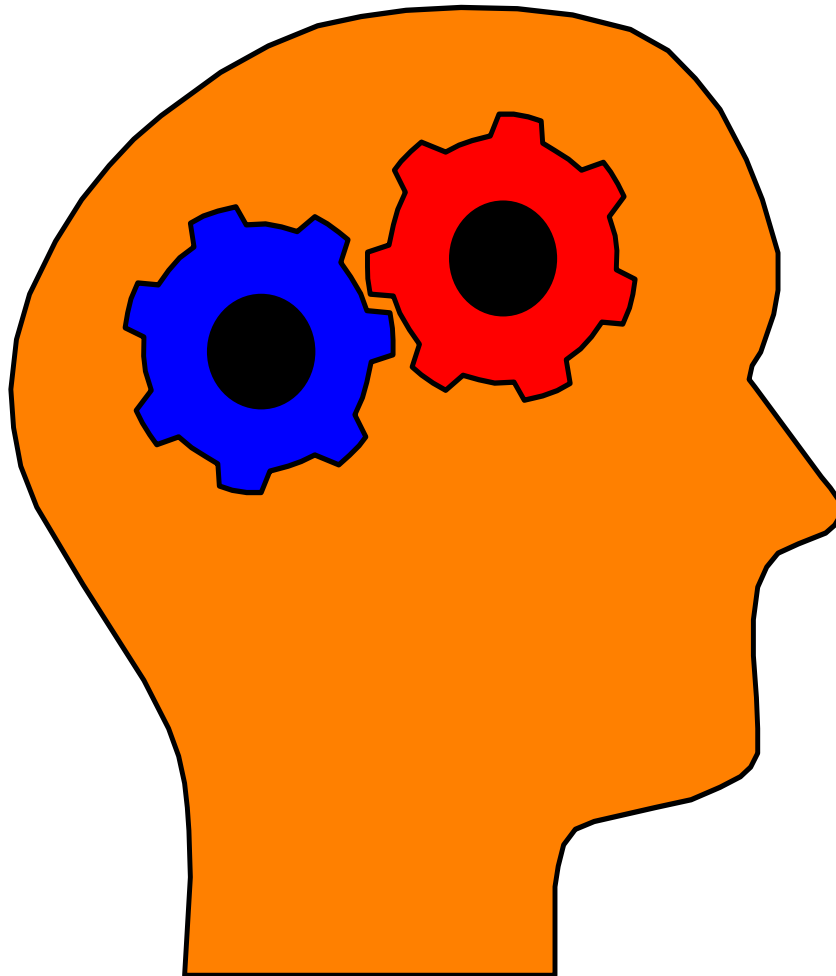
benefits.

The company will comply with all state and federal laws pertaining to Workers' Occupational Diseases and Workers' Compensation.

UNEMPLOYMENT COMPENSATION

Unemployment compensation is another form of insurance, which is paid for entirely by *SORRENTINO MARIANI & CO.* Unemployment compensation helps employees meet a loss of income resulting from unemployment beyond their control by paying certain benefits while they are out of work. This form of protection is in addition to group insurance, Social Security, and Workers' Compensation.

SECTION 4
TRANSFER OF EMPLOYEES, SEPARATION FROM
EMPLOYMENT, AND LEAVE OF ABSENCE



ONE THING IN LIFE IS A CERTAINTY---THERE WILL ALWAYS BE CHANGE. LET'S
WORK THROUGH IT TOGETHER.

Section 4

Transfer of Employees, Separation from Employment And Leave of Absence

TRANSFER OF EMPLOYEES

Transfer of employees from one department to another or from one location to another for the company's convenience may be made to meet company requirements. A request for transfer should be made in writing and submitted to the Plant Manager for consideration. A transfer may be made if management determines it is in the best interest of the company and the employee.

SEPARATION FROM EMPLOYMENT

An employee may be separated from employment voluntarily or involuntarily by retirement, voluntary resignation, lack of work, or termination. Usually, before an employee is terminated, he/she will be told the reason(s) and will be counseled by a Line Leader or the Plant Manager. However, if any misconduct warranting discipline is severe enough, the Plant Manager has the authority to discharge the employee immediately.

The Plant Manager will advise the President and the Accounting Office immediately of the date and reason for terminating an employee. All company property in the employee's possession must be returned to the Facilities Manager upon separation from employment before the final paycheck is released.

In the event of a lay-off due to lack of work, you may or may not be called back in. If you are not called back after 30 days of the said lay-off time you will be terminated from our payroll records.

VOLUNTARY RESIGNATION

Any employee voluntarily resigning his/her position with *SORRENTINO MARIANI & CO.* must submit and complete a two-week notice of resignation.

EXIT INTERVIEW

An employee planning to leave the company may be asked to participate in an exit interview. In addition to discussing his/her decision to leave the company with his/her immediate supervisor, a member of the President's Office will meet with the employee prior to the termination. Discussions concerning the reasons for leaving will assist the company in evaluating the effectiveness of its personnel policies and practices. At the time of the exit interview matters relating to final pay and any other personal considerations will be arranged.

PAY AT TIME OF SEPARATION FROM EMPLOYMENT

The company will determine if the terminating employee has any outstanding debt owed to the company and whether the individual has in his/her possession any company credit cards, uniforms, tools, keys, safety equipment, manuals, vehicles, ID cards/badges, or other company property.

After a full accounting of the employee's and the company's accounts is completed, as determined by the company, a final paycheck will be issued to the employee in accordance with state law.

The company will issue a check designated as the final payment for all services rendered. The final check will not reflect any time not actually worked except for an employee separated from employment with the company for any reason before he/she has taken part or all of his/her earned vacation. The employee may receive pay for his/her earned but unused vacation time at the time of separation from employment at the sole discretion of the owners.

Upon resignation or termination, the employee should consult the Accounting Office for possible conversion of group insurance and to address any financial issues.

Any employee terminating employment is expected to return any company property in his/her possession.

LEAVE OF ABSENCE

An employee with at least two years of service may ask for a leave of absence without pay from the company; however, no employee is guaranteed a leave of absence.

Any request for a leave of absence must be made in writing stating a definitive period of time and must be approved in advance by the President's Office. If the time period requested is longer than the position can be held open, then the employee will be advised at that time that the job may not be available upon the employee's return to work.

Management may recommend either approval or denial of a leave of absence request based upon business considerations and/or circumstances of the request, (e.g., staffing needs, employee disability, military obligations, family crisis, unusual circumstances, etc.).

Due to lack of work, the company may require an employee to take an unpaid leave of absence. The length of the company-initiated leave of absence may vary.

During any approved leave of absence the following provisions apply:

- The employee is responsible for the payment of all insurance premiums for his/her individual coverage and dependent health insurance coverage (if applicable). This money should be paid to *SORRENTINO MARIANI & CO.* by the first day of each month that the employee is on an approved leave of absence.
- The employee will retain his/her original employment date showing no interruption in service.
- Credit for paid vacation leave cannot be accrued during an approved leave of absence.
- If an employee accepts other employment, all of his/her benefits with the company will be terminated.
- Any leave of absence is without pay.

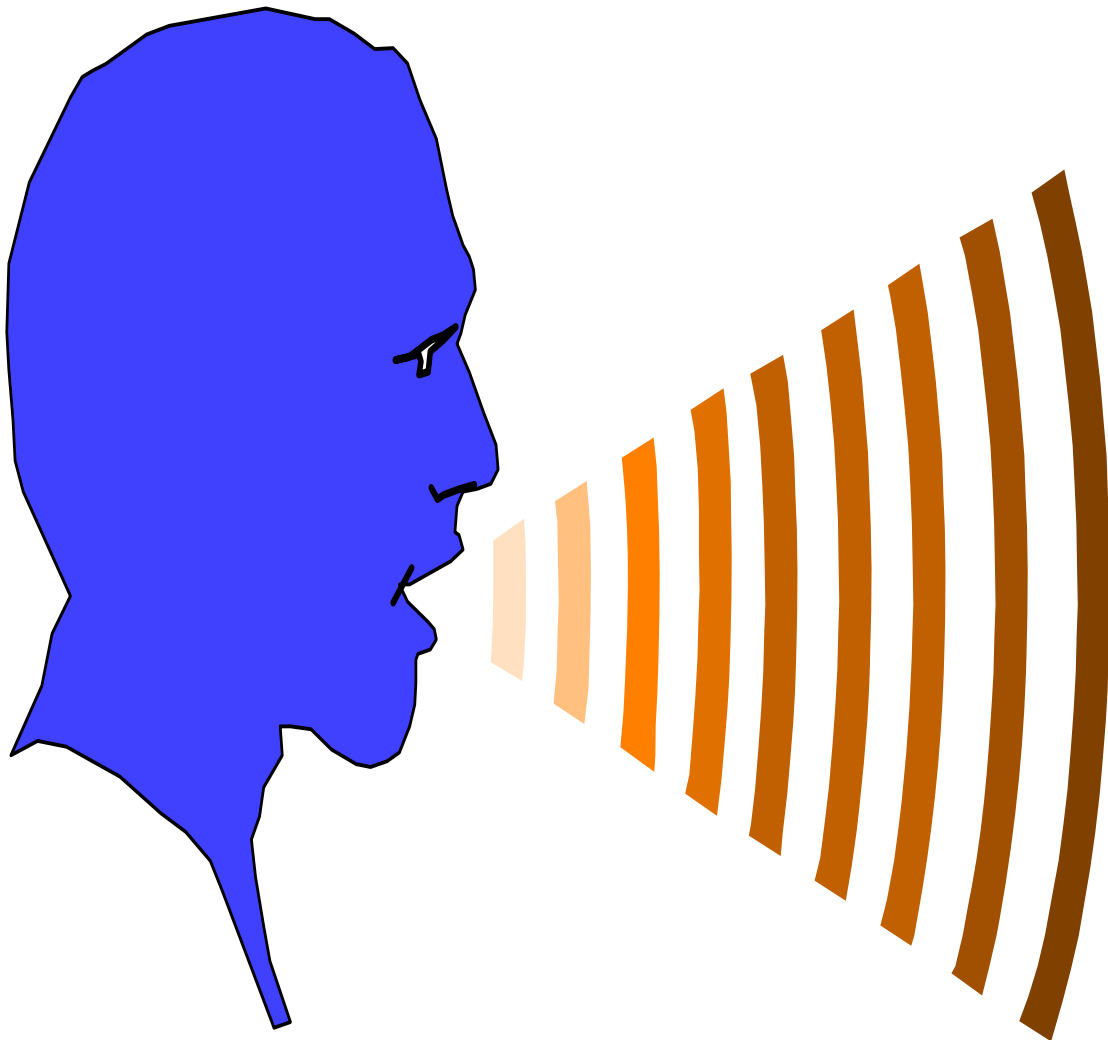
REDUCTION OF WORKFORCE

In the event that a reduction in the company's workforce becomes necessary, employees over and above the number determined by the company as needed to perform the available work will be terminated. In determining those employees to be retained, consideration will be given to the quality of each employee's past performance, the need for the position held by the employee and, with all other factors being equal, the length of service of each employee.

If feasible, but not as a vested right, employees subject to termination will be given a notice prior to the anticipated termination. Upon such termination, all accrued but unused vacation leave may be paid in full at the owners' discretion and any insurance benefits required to be offered will be brought to the employee's attention.

If placed in an "On Call" status it is your responsibility to contact the Human Resource office on a daily basis to find out if you will be needed for work on the following day.

SECTION 5
WORK POLICIES AND REGULATIONS



RULES ARE MADE FOR THE GOOD OF ALL EMPLOYEES

Section 5

Work Policies and Regulations

CARE OF EQUIPMENT AND FACILITIES

All employees should be concerned with the care and safe use of company-owned equipment and facilities. Good housekeeping is expected of every employee.

PARKING

An adequate parking area is provided for employees. Employees may park in any space that is not marked "reserved". Please cooperate by not blocking any gate, door, driveway, or the dock of the shipping and receiving area. The company assumes no responsibility for an employee's vehicle or the contents of the vehicle while on company property.

PERSONAL APPEARANCE/CLOTHING

Every employee of *SORRENTINO MARIANI & CO.* contributes to the company's overall public image during working hours. Appropriate attire enhances an employee's effectiveness in providing superior service. Each employee personally represents the company and is required to dress in a manner appropriate with prevailing business style.

The company does not object to employees having reasonably long hair if it is groomed and tied up so that it does not hang loosely so as to possibly become entangled in any machinery or equipment. Nor does it object to mustaches and/or beards if they are kept trimmed and do not hinder the employee's job performance or safety on the job.

All clothing worn in the factory should be appropriate to weather conditions and to the work being performed. No oversized, loose, or baggy clothing that could become entangled in machinery and equipment is allowed at anytime. Jewelry should not be worn around the neck, wrist or fingers. Belts must fit snugly to the waist with no dangling ends or metal catches.

All factory employees are required to wear leather work boots at all times.

All factory employees are required to wear the required safety equipment at all times. Safety equipment includes, but is not limited to, dust masks, ear plugs, safety glasses, and back braces. All safety equipment is to be signed out at the cage by appropriate personnel. Once issued to the employee it is their responsibility to return the equipment in good order. If lost or broken (other than normal wear and tear) the cost of the equipment will be deducted from the employee's check.

Office personnel are to wear appropriate business attire. Clothing is not to be tight or reveal too much skin or tattoos. Facial piercings are to be taken out when at work. Factory safety rules are in effect when they are in the working plant at all times.

While the dress code is subjective, management reserves the right to make the final decision on an employee's individual attire and appearance.

SMOKING POLICY

Due to the nature of our business there is no smoking of any kind in the factory area. Smoking is allowed in the personal offices and outside the building in the parking lots only. Please discard all smoking wastes appropriately in ashtrays and smoking buckets. Please do not discard on the ground or floors inside or outside the factory. If smoking wastes are found on the ground or floor then smoking on the property will be banned.

The success of this policy will depend upon the thoughtfulness, consideration and cooperation of smokers and non-smokers. All employees share in the responsibility of adhering to and enforcing this policy.

PERSONAL BELONGINGS

SORRENTINO MARIANI & CO. recognizes an employee's desire to display mementos pertaining to his/her family or other personal items. While **SORRENTINO MARIANI & CO.** can take no responsibility for the safekeeping of these items, it welcomes its employees to personalize their work areas for added comfort or pleasantness. However, several guidelines must be observed. They are as follows:

- **Safety Comes First** - No object can interfere with job safety as viewed by company management.
- Nothing can be displayed that (in the opinion of management) is derogatory to any person or system of beliefs.
- Objects that (in the opinion of management) are inappropriate or hinder work efforts will not be allowed and must be removed upon request.

SAFETY EQUIPMENT

Employees will be provided with safety equipment if it is a requirement for a particular job. This equipment will be signed for by the employee and replaced at the employee's expense if the equipment is lost, damaged, or stolen. Replacement will be provided if the equipment is shown to be defective.

PERSONAL TOOLS

Employees who work in certain trade positions are required to provide their own tools to perform job assignments. The area Line Leader will advise employees of the tools required and will make sure that each employee obtains the required tools. The company discourages employees from lending or borrowing tools.

COMPANY TOOLS AND EQUIPMENT

The company will furnish all necessary tools and equipment to complete job assignments. Each employee is reminded that all items purchased by the company are the property of **SORRENTINO MARIANI & CO.** and represent a very valuable asset of the company. It is the responsibility of the employee to whom tools and equipment are assigned to maintain and safeguard these assets as if they were his/her personal property.

An inventory of tools and equipment will be made periodically. If it is determined that an employee is negligent in the proper storage of tools, materials, or supplies or they are misplaced or stolen, the employee will be asked to replace same at fair market value or the cost of the item will be deducted from the employee's pay check.

When leaving a work area, it is required that all tools be placed back in designated storage areas or removed from the work area and secured in locked storage where available.

BREAK AREA

The company provides a break area equipped with vending machines, a microwave, and bottled water for the convenience of our employees. Employees are encouraged to use the break area for their scheduled break and/or lunch period. Employees owe it to fellow employees to keep the break area neat and clean. Consumption of food is only permitted in the break area.

ENERGY PRESERVATION AND WASTE PREVENTION

Waste of energy and materials is costly to the company and ultimately results in losses that must be paid for by other cost reduction actions. Employees are expected to:

- Conserve energy at every opportunity by keeping thermostats in moderate ranges; i.e., 72 degrees in summer and 68 degrees in winter
- Change filters regularly
- Drive within posted speed limits

SOLICITATION AND/OR DISTRIBUTION

To prevent disruption of business activities, to minimize distractions for all employees, and to preserve company security, solicitation and/or distribution of literature, materials, goods, contest promotions, requests for donations, or any other solicitation and/or distribution is prohibited during working time or in work areas.

SECURITY

All doors, files, desks, gates, and any other equipment with locks must be kept locked securely when not in direct use and at the end of each day. Locks should be checked regularly. Company vehicles should be kept locked at all times when not in use. Lost keys must be reported to the Office immediately. Any concerns about security should be directed to the Plant Manager or President's Office.

ELECTRONIC DEVICES

The unauthorized usage of any electronic device that can be used to copy, image, alter, download, or destroy company files are prohibited. These devices may include but in no way are limited to, cell phones, PDA's, Thumb drives, flash memory devices, iPods, and laptops. Any employee who is found accessing, copying, downloading, or destroying proprietary data without the expressed permission of the Presidents of *SORRENTINO MARIANI & CO.* will receive disciplinary action up to and including termination.

E-MAIL AND INTERNET USAGE

All employees are expected to use the internet in an appropriate manner. This means that non-work related websites (i.e. YouTube, MySpace, etc.) are prohibited. Non-work related websites are defined as websites visited for personal reasons and, in no way aides in the carrying out of work to be completed. E-mails that are deemed derogatory, offensive, sexual, or non-work related are also prohibited. These E-Mails will include those possessing written or graphical jokes. Any employee who is found in violation of this policy will be subject to disciplinary action up to and including termination. Additionally, streaming audio/video is absolutely prohibited on all company computers. The use of streaming audio/video technology has caused severe damage to company servers and workstations in the past. If you would like to listen to music or videos, you are welcome to CD's or DVD's. At no time should the use of such materials interfere with other co-workers or normal business operations.

SOCIAL NETWORKING POLICY

The company encourages employees to share information with co-workers and with those outside the company for the purpose of gathering information, generating new ideas, and learning from the work of others.

Social media provide inexpensive, informal, and timely ways to participate in an exchange

of ideas and information. However, information posted on a website is available to the public, and therefore, the company has established the following guidelines for employee participation in social media.

Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples or confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

Off-duty use of social media. Employees may maintain personal websites or blogs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas as long as they do not conflict with company policies or business.

On-duty use of social media. Employees may engage in social media activity during work time, provided it is directly related to their work, approved by their manager, and does not identify or reference company clients, customers, or vendors without express permission.

Monitoring. The company monitors employee use of company computers and the Internet, including employee blogging and social networking activity.

Respect. Demonstrate respect for the dignity of the company, its owners, its customers, its vendors, and its employees. A social media site is a public place, and employees should avoid embarrassing readers, company employees, customers, vendors, or owners. Do not use ethnic slurs, personal insults, or obscenity, or use language that may be considered inflammatory. Even if a message is posted anonymously, it may be possible to trace it back to the sender.

Post disclaimers. If an employee identifies himself or herself as a company employee or discusses matters related to the company on a social media site, the site must include a disclaimer on the front page stating that it does not express the views of the company and that the employee is expressing only his or her personal views.

Competition. Employees should not use a social media channel to criticize the company's competition and should not use it to compete with the company.

Confidentiality. Do not identify or reference company clients, customers, or vendors without express permission. Do not post pictures of company property or co-workers on the Internet without express permission.

New ideas. Please remember that new ideas related to work or the company's business belong to the company. Do not post them on social media site without the company's permission.

Links. Employees may provide a link from a social media site to the company's website during employment (subject to discontinuance at the company's sole discretion). Employees should contact the Web Design to obtain the graphic for links to the company's site and to register the site with the company.

Trademarks and copyrights. Do not use the company's or others' trademarks on a social media site or reproduce the company's or others' material without first obtaining permission.

Avoid statements about the company's future. Because the company is publicly held, writing about projected growth, sales and profits, future products or services, marketing plans, or the stock price may violate Securities and Exchange Commission (SEC) rules or other applicable laws.

BULLETIN BOARD

The company maintains a bulletin board to keep employees informed of current items of general interest. Employees should check the bulletin board regularly. Posting and/or removal of

notices must have the approval of management.

OUTSIDE EMPLOYMENT

SORRENTINO MARIANI & CO. makes every effort to keep its employees as fully employed as possible and at a good rate of pay. When an employee is on the job, this means that 100% of his/her effort is required. If an employee chooses to work outside of his/her job and the outside employment competes with what is expected of him/her as an employee of **SORRENTINO MARIANI & CO.**, opportunities for promotion and advancement with **SORRENTINO MARIANI & CO.** may be limited by his/her decision.

If management feels that outside employment prevents an employee from fulfilling his/her obligations to the company, the employee will be asked to resign from **SORRENTINO MARIANI & CO.** or to leave his/her outside employment. All management and supervisory personnel are expected to enforce this policy and, by example, refrain from conflicting outside employment.

USING THE TELEPHONE

Each time an employee makes or receives a telephone call he/she represents **SORRENTINO MARIANI & CO.** The manner in which a call is handled determines how our customers and suppliers judge **SORRENTINO MARIANI & CO.** We have a limited number of telephone lines at the company and it is essential that we keep those lines open for business calls. During working hours, employees should refrain from making or receiving personal telephone calls except for emergencies. This also includes the use of personal cell phones.

ALCOHOL AND DRUGS

Consumption of, possession of, or being under the influence of alcoholic beverages or illegal drugs on company property, in the Office, or in any vehicle used for company business is strictly prohibited. Any employee who violates this policy will be subject to disciplinary action including immediate termination of employment. Any employee who reports for work or who is at work is subject to chemical screening and/or blood alcohol testing to determine the presence of unauthorized drugs or alcohol in the body.

ALCOHOL

Consumption of, possession of, or being under the influence of alcoholic beverages on company property, in the Office or in any vehicle used for company business is strictly prohibited. Any employee who violates this policy will be subject to disciplinary action including immediate termination of employment. Any employee who reports for work or who is at work is subject to blood alcohol testing to determine the presence of alcohol in the body.

DRUGS

The company has in place a substance abuse policy that incorporates the provisions of the Drug-Free Workplace Act of 1988. All employees must abide by all of the terms and conditions of this policy while employed by **SORRENTINO MARIANI & CO.** In this regard, employees are required to read the policy and sign a statement acknowledging their understanding of the policy and intent to follow the policy. Any employee who reports for work or who is at work is subject to chemical screening and/or blood alcohol testing to determine the presence of unauthorized drugs in the body.

POLICY ON HARASSMENT

Consistent with our policy of equal employment opportunity, harassment in the workplace based on a person's race, sex, religion, national origin, age, height, weight, marital status or disability will not be tolerated concerning employees or applicants for employment. One aspect of our policy requiring some clarification is the prohibition of any form of sexual harassment in the workplace. The following describes the type of conduct that is prohibited as well as the complaint provisions to investigate and remedy any problems that may arise.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, visual or physical conduct of a sexual nature. No employee shall threaten or insinuate, either explicitly or implicitly, that another employee's or applicant's refusal to submit to sexual advances will adversely affect that person's employment, work status evaluation, wages, advancement, assigned duties, or any other condition of employment or career development. Similarly, no employee shall promise, imply or grant any preferential treatment in connection with another employee or applicant engaging in sexual conduct.

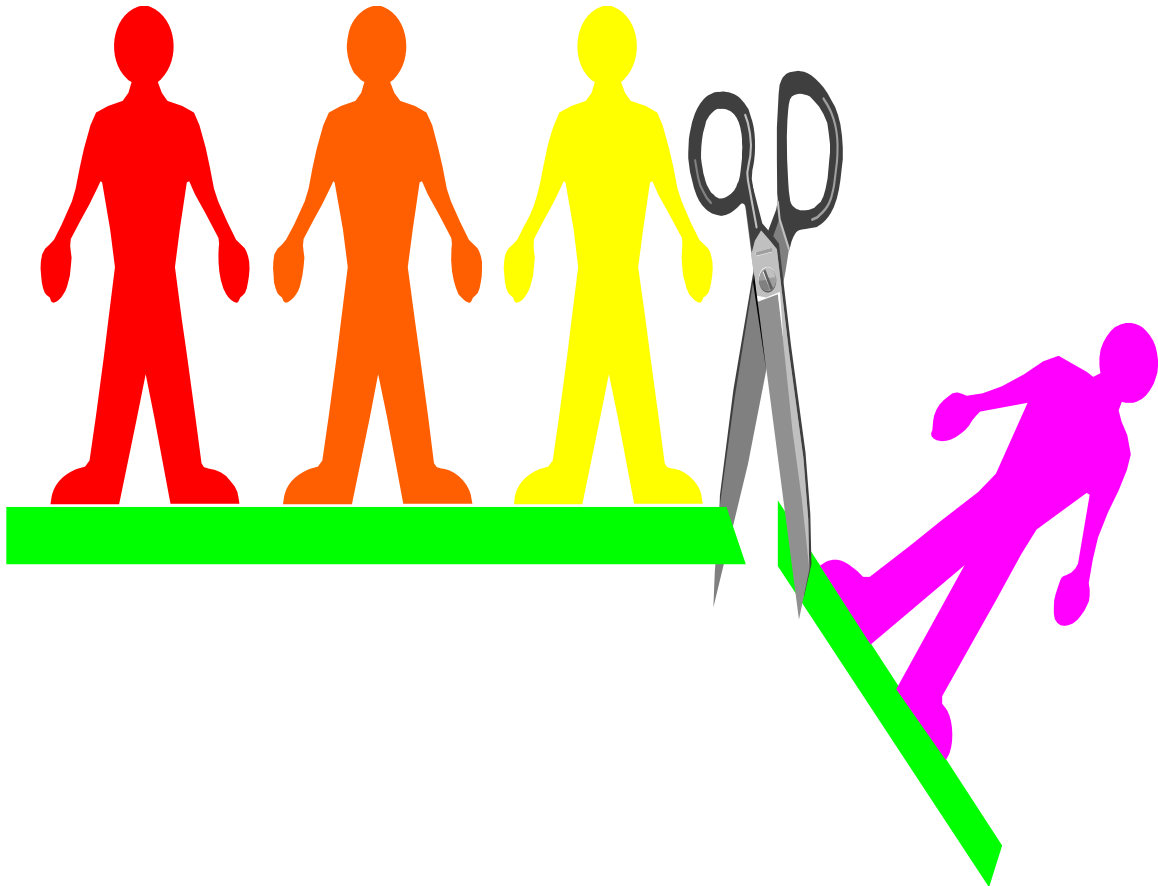
Sexual harassment also includes unwelcome sexual flirtations, advances or propositions, verbal abuse of a sexual nature, subtle pressure or requests for sexual activities, unnecessary touching of an individual, graphic or verbal commentaries about an individual's body, sexually degrading words used to describe an individual, a display of sexually suggestive objects or pictures in the workplace, sexually explicit or offensive jokes, or physical assault. Any form of sexting (sending sexually explicit messages or photographs between cell phones) is also considered to be harassment and will not be tolerated.

Any employee who feels that he/she is a victim of sexual harassment, including but not limited to, any of the conduct listed previously, by any supervisor, management official, other employee, customer, client or any other person in connection with employment at **SORRENTINO MARIANI & CO.** should bring the matter to the immediate attention of the President or Vice President of the Company.

If that would prove to be uncomfortable, an employee may directly contact any other member of management. Every effort will be made to promptly investigate all allegations of harassment in as confidential a manner as possible and appropriate corrective action taken if warranted.

After an investigation, any employee determined to have engaged in sexual harassment in violation of this policy will be subject to appropriate disciplinary action up to and including termination of employment.

SECTION 6 CONFLICT OF INTEREST



WE ARE A TEAM WORKING TOWARDS A COMMON GOAL. DON'T SET YOURSELF OFF FROM THE OTHERS. THERE ARE TIMES WHEN YOU MUST CONSIDER THE CONSEQUENCES OF YOUR ACTIONS.

Section 6 Conflict of Interest

Employees shall avoid outside employment, activities, investments, and other interests that involve obligations that may compete with or be in conflict with the interests of the company. A conflict of interest can arise in dealings with anyone with which **SORRENTINO MARIANI & CO.** transacts business, i.e., customers, clients, owners, buyers, suppliers, banks, insurance companies, and people in other organizations with whom we contact and make agreements.

Conflicts of interest should be avoided and may include the following examples:

- Working for any group mentioned above for personal gain.
- Engaging in a part-time activity for profit or gain in any field in which the company is engaged.
- Borrowing from, or lending money to, individuals representing organizations with which business dealings are conducted.

PERSONAL CONDUCT

The company expects that all of its employees will conduct themselves with the pride and respect associated with their positions, fellow employees, customers, clients, vendors, and the company. Employees should always use good judgment and discretion in carrying out the company's business. Employees of **SORRENTINO MARIANI & CO.** should always use the highest standards of ethical conduct. Improper conduct by and between employees and/or by and between employees and business associates on the company's premises or adversely affecting company work will not be tolerated. Any employee demonstrating improper conduct will be subject to disciplinary action including termination of employment.

CONFIDENTIALITY

SORRENTINO MARIANI & CO. is engaged in a business that requires that a strict code of confidentiality of information be maintained. No employee will store information outside of the company, either in written or electronic form, about any matter pertaining to the conduct of the company's business. No information regarding the purchase prices of **SORRENTINO MARIANI & CO.** shall be given to any customer, client, competitor, or vendor. No information regarding selling prices to one customer, client, or vendor shall be given to another customer, client, or vendor.

Do not discuss selling prices of products with vendors. This is delegated to top management personnel. Likewise, conversations regarding prices, services, problems, gossip, etc. about one vendor to another is only at the discretion of top management personnel. Lack of discretion in these matters is looked upon as a very serious matter. Any employee failing to abide by this policy will be subject to disciplinary action including immediate termination of employment.

In addition, idle gossip or dissemination of confidential information within the company, such as personal information, financial information, etc., will subject the responsible employee to disciplinary action or possible termination of employment.

BRIBES, KICKBACKS AND OTHER ILLEGAL PAYMENTS

Bribes, kickbacks and other illegal payments to or from any individual with whom we conduct business, in any form and for any purpose, are prohibited.

Certain types of rebates to the company from suppliers, but not to or from an individual employee, are legitimate to correct commercial inequity if done within government trade regulations.

PATENTS AND COPYRIGHTS

Any patent or copyright developed by an employee in conjunction with and/or as a result of his/her employment with **SORRENTINO MARIANI & CO.** is the property of the company. Any information pertaining to such patent or copyright must remain on company premises.

ACCEPTING GIFTS

Normally a gift to an individual from an outside source is considered the property of the company unless management makes an exception. It is the policy of **SORRENTINO MARIANI & CO.** that no employee shall receive any gift, excessive or unusual entertainment, loan, or other favor valued in excess of \$20.00 from any outside source including customers, clients, and suppliers, without approval from management. Any employee who fails to abide by this policy will be subject to disciplinary action including immediate termination of employment.

SECTION 7
RULES THAT HELP US ALL



**THE FOLLOWING SECTION IS A STANDARD OF CONDUCT THAT THE COMPANY SETS
AS THE STANDARD FOR ALL EMPLOYEES**

Section 7 Rules That Help Us All

It is the policy of *SORRENTINO MARIANI & CO.* to expect all employees to abide by certain work rules of general conduct and performance at all times. The regulations governing employee conduct and responsibilities have been established in the best interest of the company, and its employees.

Accordingly, a violation of these regulations constitutes misconduct on the part of the employee and appropriate disciplinary action will be initiated. These rules are guidelines only and are not all-inclusive. Disciplinary action may include, but is not limited to, verbal reprimand, written notice, suspension from work without pay, and immediate termination of employment. Management reserves the right to terminate or discipline any employee that the company, at its discretion, considers necessary in individual circumstances.

In the event an employee is suspended from work for disciplinary reasons, benefits will not accrue nor will benefits be recoverable during the suspension period.

EXAMPLES OF MISCONDUCT

The following are only examples of misconduct for which an employee may be subject to discipline and these examples do not constitute a complete list of the circumstances for which discipline will be warranted.

- Falsification of any records or reports pertaining to absence from work, claims pertaining to injuries occurring on company premises, claims for any benefits provided by the company, communications or records including personnel and production records.
- Giving false fire alarms, or causing false fire alarms to be given, or tampering with protection equipment.
- Restricting output, or persuading others to do so, or promoting, encouraging, agitating, engaging in or supporting suspension of work, slowdowns, or any other interruptions of production.
- Sabotage or subversive activity of any kind.
- Misuse or removal from the premises, without authorization, of any company property, or possession of any property removed from company premises without proper authorization.
- Bringing, using or possessing weapons on company premises at any time.
- Bringing, using, possessing, transporting, selling or promoting the use of, alcohol, any intoxicant, any narcotic, any barbiturate, any amphetamine, any hallucinogen, or any other stimulating or depressing drug on company premises at any time.
- Striking or manhandling another person or fighting while on company premises at any time.
- Striking a member of management at any time in connection with any matter relating to employment.
- Theft of any property on company premises, or theft of company property at any time.
- Willful abuse, or deliberate destruction of company property, tools or equipment, or of any property on company premises at any time.
- Gross insubordination - a willful and deliberate refusal to follow reasonable orders given by a member of management.
- Violation of the company's Equal Employment Opportunity Policy or Policy on Harassment.
- Committing an immoral or indecent act while on company property regardless of whether the act was committed during the employee's workday.

- Altering any employee time card regardless of whether it is the employee's own time card or that of another employee.
- Intentionally punching the time card of another employee or having another employee punch his/her time card.
- Conviction of any offense by a court of law which in management's judgment would make that employee undesirable for association with the company and its other employees.
- Reporting for work under the influence of, or when suffering from, a hangover from alcohol, any intoxicant, any narcotic, any barbiturate, any amphetamine, any hallucinogen, or any other stimulating or depressing drug.
- Threatening, intimidating, coercing or interfering with any person on company premises at any time.
- Sleeping on company time.
- Altering, defacing or removing governmental or company notices and bulletins that are posted.
- Gaining unauthorized access to company records and files whether they are locked or otherwise.
- Handling or operating machines, tools or equipment that does not come within the employee's authority.
- Careless or negligent use or operation of company tools or equipment.
- Failure to immediately report to management any injury or accident resulting from an on-the-job situation.
- Performing substandard work both in quality and quantity after having been instructed in proper procedure and technique.
- Unauthorized leave from the work area during scheduled work exceeding the time allowed for scheduled break or lunch period.
- Unauthorized manufacture of products for personal use.
- Unauthorized distribution of literature in the work area or posting on company property.
- Distraction of other employees, or causing confusion by unnecessary shouting, catcalls, whistling or demonstration while on company property.
- Punching in more than two minutes prior to the start of the employee's work day or out more than two minutes following the conclusion of his/her work day without authorized permission.
- Engaging in horseplay, practical jokes, gambling, selling merchandise, solicitation or general loitering while on company property.
- Having non-employees on company property at any time without authorized permission.
- Using profane language on company property, which in management's opinion is offensive to visitors and to other employees.

PROGRESSIVE DISCIPLINE POLICY

Purpose. To establish rules pertaining to employee conduct, performance, and responsibilities so that all personnel can conduct themselves according to certain rules of good behavior and good conduct.

The purpose of these rules is not to restrict the rights of anyone, but rather to help people work together harmoniously according to the standards we have established for efficient and courteous service for our customers.

Reasonable rules concerning personal conduct of employees are necessary if the facility is to function safely and effectively. You will be kept informed of department rules and changes to those rules by your supervisor or department head.

The company believes that you want to, and will, do a good job if 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.

Policy. Degrees of discipline are generally progressive and are used to ensure that the employee has the opportunity to correct his or her performance. There is no set standard of how many oral warnings must be given prior to a written warning or how many written warnings must precede termination. Factors to be considered are:

- How many different offenses are involved
- The seriousness of the offense
- The time interval and employee response to prior disciplinary action(s)
- Previous work history of the employee

Exceptions. For serious offenses, such as fighting, theft, insubordination, threats of violence, the sale or possession of drugs or abuse of alcohol on company property, refusal to take a drug or alcohol test etc. termination may be the first and only disciplinary step taken. Any step or steps of the disciplinary process may be skipped at the discretion of SMCO after investigation and analysis of the total situation, past practice, and circumstances.

In general, several oral warnings should, at the next infraction, be followed by a written warning, followed at the next infraction by discharge. This is especially true in those cases where the time interval between offenses is short and the employee demonstrates a poor desire to improve his/her performance.

Penalties for Specific Offenses

Penalties for group 1:

- First offense: Oral or written reprimand
- Second and Third offense: Written reprimand
- Fourth or more offense: Suspension or termination

Penalties for group 2:

- First offense: Suspension or termination

Group 1: Offenses include but are not limited to:

- Being tardy habitually with or without reasonable cause
- Being absent without notification or excuse
- Leaving your job or your regular working place during working hours for any reason without authorization from your supervisor, except for lunch, rest periods and going to the restrooms
- Disruptive conduct on company property (i.e. loud shouting or music, excessive or vulgar profanity, running, jumping, etc.)
- Leaving work before end of shift or not being ready to go to work at the start of shift

- Interfering with the work of other employees
- Inefficiency or lack of application of effort on the job
- Violations of company policies outlined in sections of this policy manual (the Employee Handbook)
- Contributing to unsanitary conditions or poor housekeeping
- Malicious gossip and/or the spreading of rumors

Group 2: Offenses include but are not limited to:

- Immoral conduct or indecency on company property
- Imperiling the safety of other employees
- Having one's sheet filled out by another employee, or unauthorized altering of a time sheet
- Knowingly filling out time sheets of another employee
- Gambling on company property
- Possession of narcotics, or consuming narcotics on company property (anyone thought to be under the influence will be subjected to a drug test, refusal will be grounds for immediate termination)
- Reporting for work in an intoxicated condition (anyone thought to be under the influence will be subjected to a blood/breath alcohol test, refusal will be grounds for immediate termination)
- Responsibility for instigating fighting on company property
- Dishonesty or removal of another employee's property or company property without permission
- Willful destruction of company property
- Insubordination (refusal to perform a reasonable request related to work or personal conduct by an employee's immediate supervisor or refusal to obey any reasonable request given by any employee's supervisor, other management or line leader. Or any inappropriate language used towards management to undermine their authority)
- Misrepresentation of qualifications and ability to perform all job duties as required in job description
- Refusal to perform work assigned to an employee
- Absence for three consecutive working days without notification to the company or without acceptable excuse
- Thievery
- Possession of firearms, fireworks or explosives on company property without written permission from management

Probation. You may be placed on probation in connection with the written warning for a period of time determined by SMCO. Wage increases, vacations, holiday pay and transfers will not be given during this period, but all other benefits will continue.

Investigative suspension. An investigative suspension is a period, not to exceed three (3) working days, during which time an employee is relieved of his/her job because of alleged serious misconduct.

An employee may be placed on investigative suspension when it is necessary to make a full investigation to determine the facts of the case, as in a fighting, insubordination or theft incident.

If after the investigation:

- Discharge is warranted, the employee shall not be paid for the period of the investigative suspension-the discharge shall be effective on the date of the termination interview
- Misconduct is determined, but not of a sufficiently serious nature to warrant discharge, the employee shall receive a warning notice and forfeit pay lost as a result of the investigative suspension and may be placed on disciplinary suspension and/or probation.
- If no misconduct is determined, the employee shall return to work within the prescribed period.

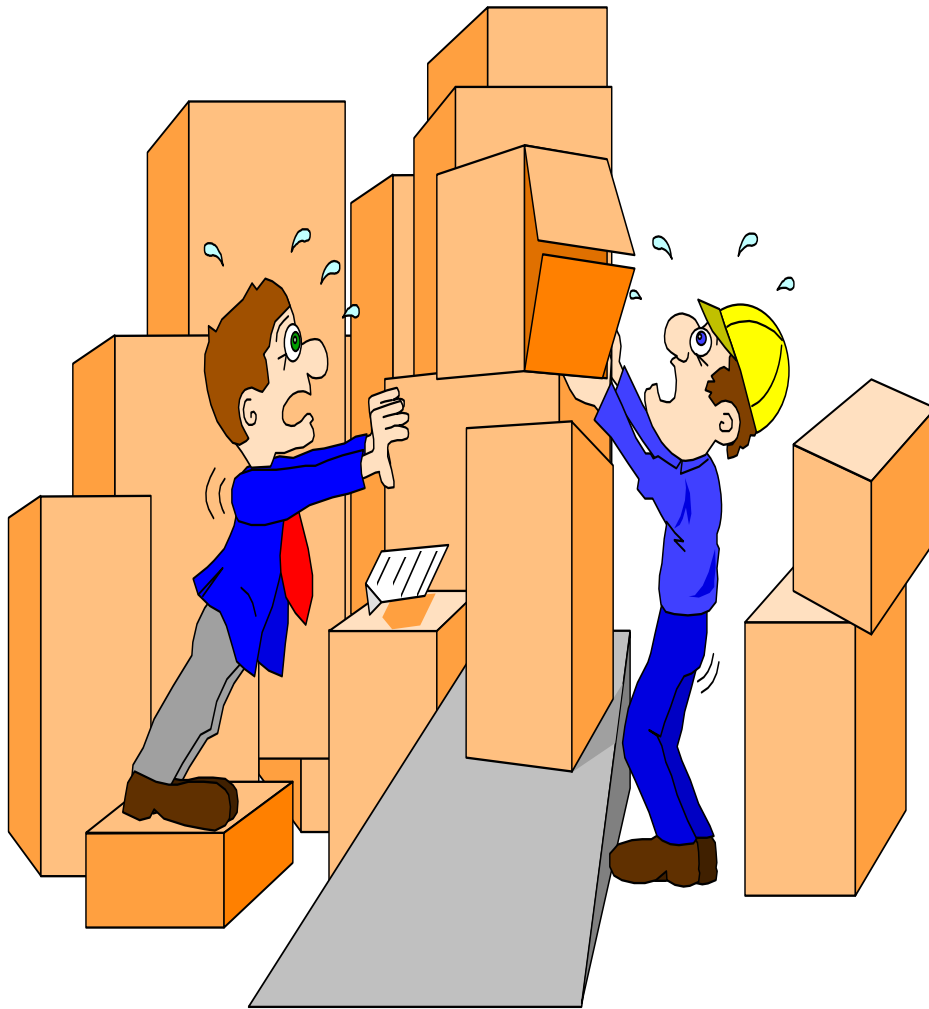
Disciplinary Suspension. A disciplinary suspension is a period of not more than two (2) weeks and may be given in addition to the investigatory suspension or as punishment for the violation. The employee is relieved of his/her job assignment because of serious or repeated instance of misconduct and shall forfeit pay lost as a result of the suspension in situations where there is no specific instance of conduct that is so outrageous that justifies termination but there is a pattern of conduct where the employee has continually engaged in one minor infraction of the rules after another and has received a documented verbal and/or written warning for rule infractions.

Crisis Suspension. A crisis suspension is given at the discretion of the supervisor when action must be taken immediately and Human Resource Manager or the Owners are out of the area.

Discharge. When the employee is discharged as a result of serious offense, or as the final step in an accumulation of infractions for which a warning notice or notices have been written, the employee will be discharged for cause instead of being given the option to resign, be laid off, or retire.

Documentation. SMCO will document a disciplinary process beginning with the first verbal warning. A report of the disciplinary action will be retained in the employee's personnel file, however, if no further disciplinary action is required after two (2) years, the report will remain as part of the employee's personnel file but will no longer be considered a part of the employee's record.

SECTION 8 SAFETY



SAFETY IS EVERYBODY'S BUSINESS. STAY ALERT. STAY SAFE. DO YOUR PART AND WEAR YOUR SAFETY EQUIPMENT. EARPLUGS, BACK BRACES, SAFETY GLASSES, AND WORK SHOES, ARE ALL PROVIDED. PROTECT YOURSELF. CHECK, INSPECT AND INFORM.

SORRENTINO MARIANI & CO. is committed to the safety of its employees and its property and equipment. To this end, we will utilize a safety program in our daily activities. Any employee who disregards any company safety rule and/or regulation is subject to disciplinary action including termination of employment.

It is necessary that the company establish safety rules and regulations to be observed by all employees at all times. With regard to these rules, the following will be considered standard procedure for all employees:

- Should a safety regulation be modified so that an employee's safety is something less than it should be, the employee should inform his direct supervisor.
- All questions concerning the reason for doing something in a certain manner may be asked of any member of management at any time.
- Employees' decisions should always be guided by the company's commitment to safety.
- Should a hazardous situation or condition exist and a decision has to be made on safety or production, safety concerns should always take precedence over production.

It is management's responsibility to see that every employee at **SORRENTINO MARIANI & CO.** is provided with safe working conditions, that all safety regulations are observed and that employees use good common sense to protect themselves as well as others. Management will periodically inspect working conditions and may suspend all work activity until an unsafe condition is corrected.

The most important part of safety is YOU. It is your responsibility to abide by the safety rules. These rules are made for your protection. Report any personal injury IMMEDIATELY, however minor. Report all dangerous conditions and practices to any member of management.

SAFETY RULES

The following is an incomplete list of safety rules and these rules are not intended as a substitute for common sense and good judgment.

- First aid supply kits are provided in the work area. It is the responsibility of the Facilities Manager to see that the kits are well stocked.
- Know where the fire extinguishers are located and know how to use them.
- All defective materials or tools must be brought to the attention of the Line Leaders / Plant Manager and not remain on the job.
- When necessary, safety goggles or glasses will be provided by the company. Protective devices must be used at all times while working in the production areas of the plant, when handling hazardous materials and/or operating loud power tools and machinery.
- Hearing protection devices are supplied by the company for jobs which require such devices. Employees must wear them if they are so instructed.
- Wear clothes suited for the job. Do not wear open-toed shoes.
- Leather work boots are a requirement for factory employment.
- Employees performing any work around saws, drills or machinery with moving parts should remove all jewelry before reporting for work.
- Practice good housekeeping. Keep work area clean and free from stumbling hazards, grease, etc.
- Do not allow raw material, finished goods or trash to be in aisles or stairways.

- Do not throw anything from a height before checking to make sure that no one is below.
- Learn to lift the correct way: bend knees, keep back erect, and get help for heavy loads.
- No scuffling or horseplay on the job.
- Do not run within the work area.
- Employees must be sure that their actions do not endanger other employees or damage company or personal property.
- Keep guards and protective devices in place at all times. When guards are removed for repairs, replace in proper order before starting up equipment.
- Use tools only for their intended purposes. Do not use broken or dangerously dull tools.
- Do not attempt to operate special machinery or equipment without permission and instructions.
- Do not repair or adjust machinery while it is in operation. Never oil moving parts except on equipment fitted with safeguards for this purpose.
- Extension cords used with portable electric tools and appliances must be of the three-wire type. Defective cords must be replaced when they become defective.
- Defective materials or tools must be labeled with accident prevention tags. Labeling must be done on the same day on which the defective piece of equipment is discovered.
- Read all Material Safety Data Sheets (MSDS) located in the front office and in the factory supply office, which are supplied with hazardous materials, and abide by the instructions. Direct any questions to any member of management.
- If any employee suspects that a material might be harmful to his/her health, he/she should consult with any member of management.

HAZARDOUS WASTES

The Environmental Protection Agency has grouped certain chemicals and chemical groups into categories that have been defined as toxic. This means that in concentrated forms or by accumulating and combining with other chemicals (even the air) these chemicals can be hazardous to human health if exposure occurs.

From time to time in the normal course of their jobs, employees may handle materials that have been classified as hazardous by the standards of the Occupational Safety and Health Act (OSHA) regulations.

Hazardous materials that are received from our suppliers should have Material Safety Data Sheets (MSDS) or labels that state the chemical ingredients of the contents, precautions to take, and what to do if exposure occurs.

If any employee suspects that the materials or wastes he/she may encounter as an employee are hazardous (whether or not they are being created or used by the company), he/she should inform any member of management, immediately.

As a company, we are committed to not creating or disposing of hazardous wastes that will contaminate the environment. We will choose materials which have been judged as non-hazardous whenever possible and will properly dispose of hazardous materials if used. Also, we will not knowingly dump any wastes into the environment at any time.

We will inform employees how to control hazardous wastes and what to do if they are exposed to hazardous wastes.

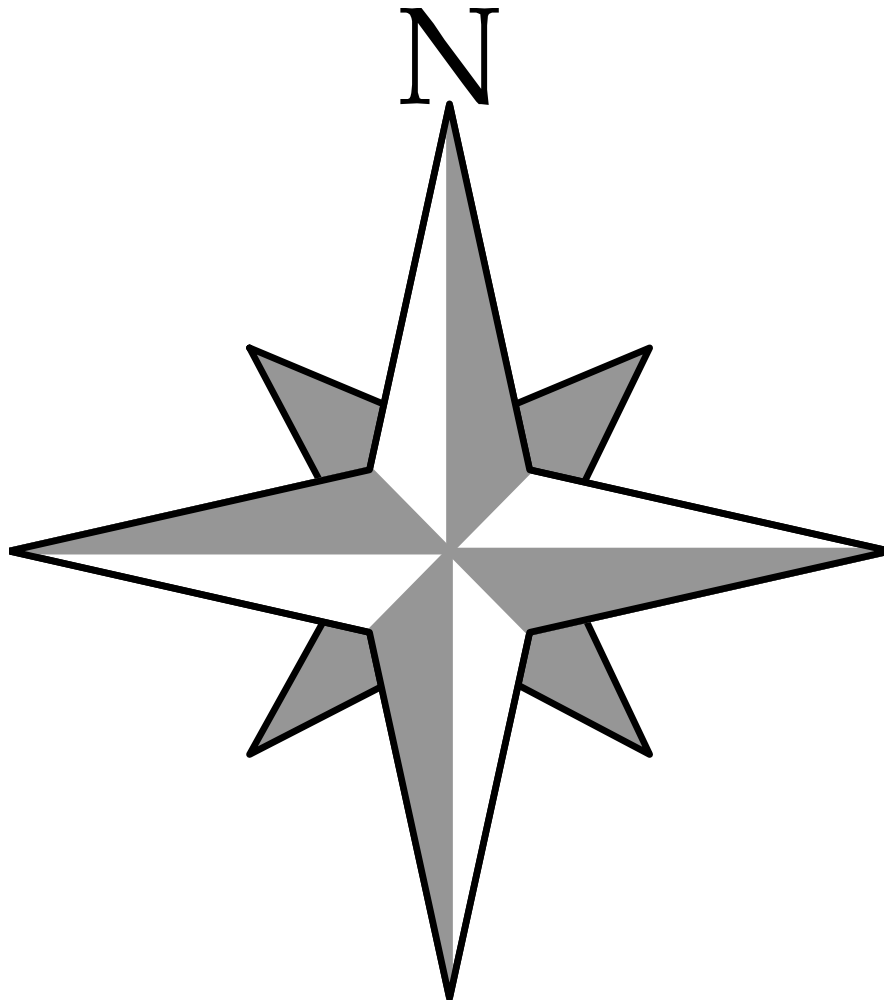
REPORTING INJURIES AND ACCIDENTS

Employees must advise the Plant Manager and the President's Office of all accidents, injuries or illnesses that occur while at work. All accidents, injuries or illnesses that occur while at work must be reported immediately no matter how slight they may appear.

The company will provide the proper forms for reporting job-related accidents, injuries and illnesses. Any employee failing to report such occurrences will be subject to disciplinary action.

In the event of a vehicular accident involving a company-owned/leased vehicle or while on company business, the employee must report all information immediately to Mr. Rick Mariani and/or the Office. In no instance should responsibility for an accident be expressed to anyone until the proper person in the company has been notified and permission has been obtained to make statements.

SECTION 9
TRANSPORTATION AND TRAVEL EXPENSES



WHEN TRAVELING FOR THE COMPANY KNOW THE RULES OF THE ROAD

Section 9
Transportation and Travel Expenses

COMPANY-OWNED/LEASED VEHICLES

All travel in company vehicles on other than company business must be authorized in advance by your direct supervisor or line leader. This includes vehicles that may be leased by the company as well as those vehicles that are owned by the company.

The following are specific policies related to company-owned/leased vehicles:

- Daily records must be kept for all mileage driven.
- Company-owned/leased vehicles will be driven only as needed for jobs during working hours.
- Company-owned/leased vehicles will be driven only for transportation to and from destinations as specified.
- Company-owned/leased vehicles will not be driven for private use unless specific arrangements have been made in advance.
- Only the driver assigned to the vehicle is authorized to sign for gasoline, oil, etc.
- All charge receipts must include the date of purchase, and the amount paid.
- Alcoholic beverages or illegal drugs or chemicals will not be allowed in a company vehicle at any time.
- No driver who has been drinking alcoholic beverages or is under the influence of drugs or chemicals will be allowed to drive a company-owned/leased vehicle.
- No one, other than an authorized company employee, is permitted to operate or ride in a company-owned/leased vehicle.
- Vehicles must be kept clean (interior and exterior) at all times and thoroughly washed on a regular basis.
- Vehicles must be properly maintained according to the manufacturer's schedule.
- Any employee who misuses a company-owned/leased vehicle will be subject to dismissal.
- Any damage to a company-owned/leased vehicle caused by employee carelessness or misjudgment is the responsibility of the employee. This includes insurance deductibles.

PERSONAL VEHICLES

Employees may use their personal vehicles on official company business provided prior approval has been obtained from the President's Office. A mileage rate based on acceptable and current Internal Revenue Service regulations will be paid to an employee who uses his/her personal vehicle on official company business. Minimum insurance requirements as specified by the company's insurance carrier must be in effect at the time the employee's personal vehicle is used and the employee may be required to provide the appropriate proof of insurance.

LIVING EXPENSE ALLOWANCE

The company will reimburse employees for reasonable expenses incurred when they are traveling on company business. The company will pay the cost of reasonable lodging for the employee. In addition, a living expense allowance for meals is provided to salaried and supervisory personnel routinely away from their home requiring overnight accommodations.

The Accounting office will advise the employee of allowable living expenses to be paid by the company prior to any travel assignment.

OTHER TRAVEL EXPENSES

Any travel and/or business expenses not covered by the living expense allowance described previously must be submitted for reimbursement by providing receipts showing name(s), date(s), business discussed, amount(s) and the account to be charged.

EXPENSE RECORDS

All expense records, including gasoline credit card receipts, must be turned in on the first working day an employee returns from a trip . Proper documentation for all expenses is required.

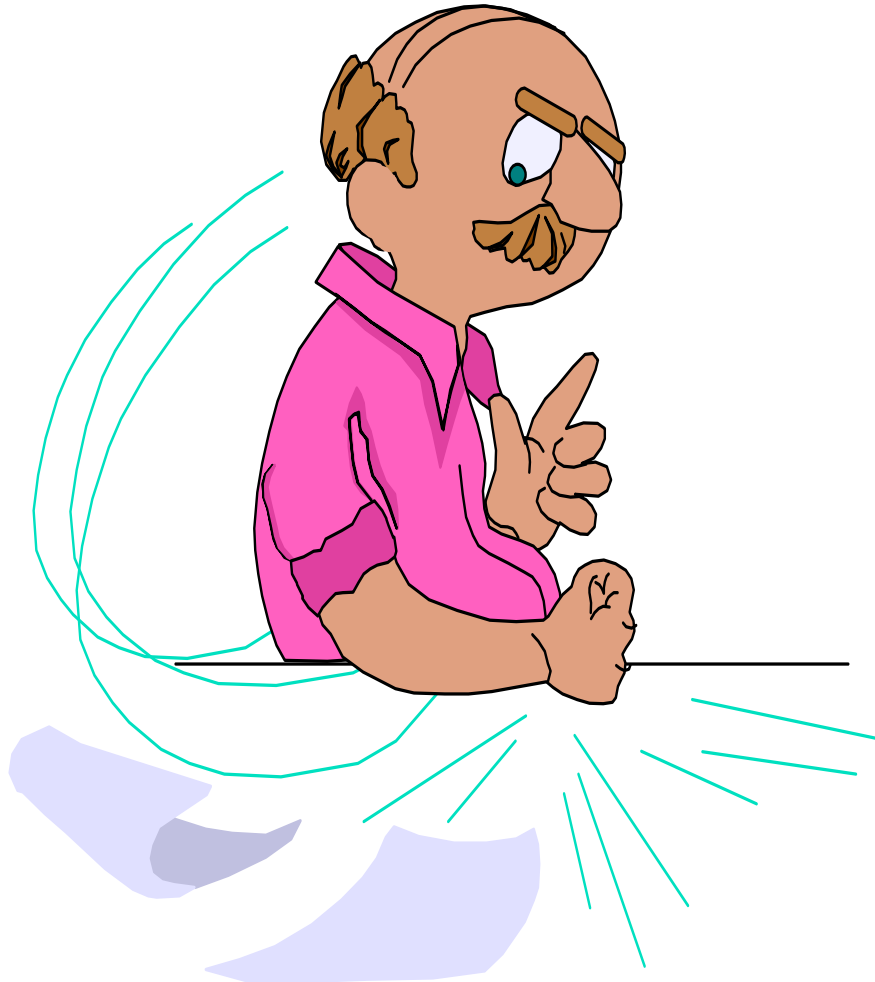
TRAVEL ADVANCES

An advance for out-of-state travel may be provided upon request to the Accounting office.

TRAVELING RULES

All employees who embark on a trip must report to the front office to obtain a Travel Package prior to departure. Each Travel Package will include timecards, expense reports, flight reservations, hotel reservations, itineraries, Section 9 acknowledgement forms, punch list, and details outlining the scope of work to be performed. One employee will be designated as the Team Leader for all trips. This employee will be responsible for accounting for hours worked by team members. All hourly employees will have 45 minutes deducted each day from their total hours for lunch breaks. Each timecard must be verified by the employee and signed by the Team Leader prior to submission. Timecards, expense reports, acknowledgement forms, and any other forms required for travel must be turned in on the first working day an employee returns from a trip.

**SECTION 10
EMPLOYEE CONCERNS**



**OK! OK! OK! SOMETIMES WE ALL MAKE MISTAKES! HAVE A COMPLAINT,
SUGGESTION OR CONCERN? FOLLOW THESE GUIDELINES TO RESOLVE YOUR
ISSUES.**

Section 10 Employee Concerns

SORRENTINO MARIANI & CO. believes in open communication. If an employee has a suggestion or concern, management wants to know about it. In most cases, an employee will get satisfaction by discussing the matter with his/her Supervisor or Line Leader. However, the company recognizes that not all complaints will be satisfactorily resolved between an employee and his/her Supervisor or Line Leader.

For complaints that cannot be resolved informally, the following procedure has been established to ensure a fair and impartial review. All complaints will be given prompt and objective consideration in an atmosphere of mutual assistance.

Time periods specified may be extended at the discretion of the management person reviewing a particular complaint if extenuating circumstances justify a longer period.

This complaint reporting procedure does not apply directly to complaints of harassment, which are more specifically discussed in Section 5 - Work Policies and Regulations.

Step 1 The employee must present his/her complaint to the Plant Manager, Supervisor, or Line Leader who will make a thorough inquiry into the facts and circumstances of the complaint and will make every effort to resolve the matter promptly and fairly within five working days of receiving the complaint. (However, should the complaint be against the Plant Manager, Supervisor, or Line Leader go directly to STEP 2)

Step 2 If an employee is dissatisfied with the decision of the Plant Manager, Supervisor, or Line Leader the employee may submit a written report to the Human Resource Manager within five working days of receiving the decision.

If further review is required, the HR Manager will conduct the appropriate investigations and hearings and advise the employee in writing of the findings and of any change in the earlier decision.

Regardless of the time limits established, the filing of a complaint will not be accepted after an employee has been terminated from employment.

Step 3 At any time within five working days following receipt of the decision reached in Step 2 or within two working days after the employee's termination date, the employee may submit a written request for further review of his/her complaint to the President of **SORRENTINO MARIANI & CO.** The personnel actions taken previously will be reviewed and a final decision will be made.

SORRENTINO MARIANI & CO.

**Acknowledgment of Receipt
Read and Sign Immediately**

I have received a copy of the Information Handbook for Employees of ***SORRENTINO MARIANI & CO.***, and understand that I am responsible for reading its contents and asking any questions I may have concerning the information outlined in the handbook. I understand that this must be accomplished and the handbook returned within seven (7) days. At that time, I understand that I will be required to sign an acknowledgment stating that I have read, understand, and agree to abide by the practices and procedures outlined within.

Name: _____

Signature: _____ Date: _____

Witness: _____

SORRENTINO MARIANI & CO.

**Acknowledgment of Understanding
Read and Sign**

I understand and agree that:

- The statements contained in the Information Handbook for Employees of ***SORRENTINO MARIANI & CO.*** are intended to serve as general information concerning ***SORRENTINO MARIANI & CO.*** and its existing policies, procedures, practices of employment and employee benefits.
- Nothing contained in the Information Handbook for Employees of ***SORRENTINO MARIANI & CO.*** is intended to create (nor shall be construed as creating) a contract of employment (express or implied) or guarantee employment for a definite or indefinite term.
- From time to time ***SORRENTINO MARIANI & CO.*** may need to clarify, amend and/or supplement the information contained in the Information Handbook for Employees of ***SORRENTINO MARIANI & CO.*** and that the company will inform me when changes occur.
- I have reviewed a copy of the Information Handbook for Employees of ***SORRENTINO MARIANI & CO.***, have read and understand the information outlined in the handbook, have asked any questions I may have concerning its contents and will comply with all policies and procedures to the best of my ability.

Employee's
Signature _____

Date _____

Location _____

Authorized
Witness _____