


KENSON PLASTICS PROCEDURE

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	Approved By:	Christopher O'Leary	Revised Date:	2017 OCT 06
	Signature:	<i>Signature on File</i>	Revision Edition:	A

1.0 INTRODUCTION:

1.1 PURPOSE:

Kenson Plastics Inc. is a premier manufacturer of precision pressure-formed plastics since 1972, specializing in engineered plastic components and enclosures primarily for the medical, electronic and transportation industries. Our cost-effective solutions combine pressure-forming, complex machining and unsurpassed finish work to meet the most exacting engineering and aesthetic requirements.

Kenson Plastics Inc. is committed to ensuring a safe, healthful and productive environment for its employees and guests. As part of this commitment Kenson Plastics Inc. shall be dedicated to communicating and administering well defined, fair and unbiased policies to include those governing employment.

The policies and protocols summarized in this procedure do not constitute an employment contract, nor are they a commitment to any employee concerning how individual employment action can, should or will be handled.

The Kenson Plastics Employees Guidelines Manual shall work in tandem with the Policies and Procedures as specified via the Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE).

1.2 SCOPE:

Bargaining Unit Employees shall be governed by the Benefits, Discharge and Discipline, Wages, Work Hours, Holidays, Vacations, Leaves of Absence, Health and Medical benefits etc. policies and procedures as detailed in the Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE).

Policies implemented by this procedure and not covered under the Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE) as long as not in direct contrast or opposition with said Agreement shall be applicable to Bargaining Unit Employees.

Exempt / Salaried Employees of Kenson Plastics Company shall be held accountable to the policies implemented by this procedure.

2.0 GENERAL:

2.1 DEFINITIONS

2.1.1 Bargaining Unit Employee: A worker whose wages, hours, and work conditions are negotiated through collective bargaining between the union and the employer.

2.1.2 Controlled Substance: Any substance which is not legally obtainable or which the actor has not obtained or is not using legally.

2.1.3 Eligible Employees: Full-time employees are eligible for the benefits described in this manual and / or the Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE) as applicable to their employment status. Part-time employees and Temporary Workers are not eligible for benefits.

2.1.4 Exempt / Salaried Employees: Employees, including managers, who perform work exempt from the minimum wage and overtime pay provisions of the Fair Labor Standards Act and Pennsylvania law, as applicable. Such employees are normally paid a salary which covers all hours worked each week and which is not subject to deduction for partial work days missed.

- 2.1.5 Under the influence: Unable to perform work in a safe and productive manner; being in a physical or mental condition that creates a risk to the safety and well-being of the individual employee, other employees, the company or other persons; or having a detectable / trace amount of a controlled substance in their body.

2.2 REFERENCES:

- 2.2.1 The Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE).
- 2.2.2 Fair Labor Standards Act: Salaried employees who are exempt from the minimum wage and overtime pay provisions of the Fair Labor Standards Act are paid a predetermined salary each pay period that is not subject to reduction in any week because of variations in the quality or quantity of the work performed. A salaried exempt employee generally will receive his or her predetermined salary for any week in which he/she performs work. Only deductions permitted by law will be applied to the salary.
- 2.2.3 Kenson Plastics Inc. Code of Conduct
- 2.2.4 Pennsylvania Department of Labor and Industry, Labor Law Compliance
- 2.2.5 Human trafficking, or sexual exploitation and abuse (reference: Trafficking Victims Protection Act of. 2000 / Executive Order section 103 of the TVPA, 22 U.S.C. 7102(8)).

3.0 PROCEDURE

- 3.1 EQUIPMENT AND REAGENTS: None specific to this procedure.

- 3.2 ENVIRONMENTAL, HEALTH, AND SAFETY REQUIREMENTS: Kenson Plastics Inc. shall provide a safe and healthful environment for its employees and guests to their fullest capability.

- 3.2.1 Kenson shall be in compliance with all applicable Local, State and Federal Laws and Standards and utilize adequate methods, processes, procedures, equipment and maintenance to support these efforts.
- 3.2.2 Kenson Plastics Inc. supports and participates in an Environmental, Safety and Health Committee as structured and designated via the Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE).
- 3.2.3 Kenson Plastics Inc. supports a tobacco free policy. As a result, no smoking or other use of tobacco products shall be permitted on company property other than in designated areas.
- 3.2.4 Kenson Plastics Inc. shall provide adequate Personal Protective Equipment (PPE) as determined by law, standards and industrial practice.

- 3.3 ADVISORY NOTES:

- 3.3.1 All personnel must comply with Kenson policies and the Agreement between Kenson Plastics Inc. and the United Electrical, Radio and Machine Workers of America (UE) and Local 690, United Electrical, Radio and Machine Workers of America (UE) as appropriate and report any associated violation. All personnel are required to cooperate fully in any investigative, preventative, corrective and remedial actions. Failure to fulfill these responsibilities is a violation of Kenson policy and may result in disciplinary action.
- 3.3.2 Kenson Plastics Inc. is committed to ensuring that it is in compliance with all local, state and federal regulations regarding labor law compliance to include the Child Labor Law (Act of 2012 P.L. 1209, No 151),

- 3.4 NON-DISCRIMINATION POLICY

- 3.4.1 Equal Opportunity Employer: Kenson Plastics Inc. is an equal opportunity employer and does not discriminate against or in favor of any applicant for employment or any employee because of that person's race, color, gender, pregnancy, sexual orientation, religion, national origin, citizenship, ancestry, genetic information, familial status, age (40 and over), non-disqualifying disability or other protected status or protected activity. Illegal discrimination, harassment and retaliation are strictly prohibited, not only because such actions violate the law, but also because such conduct is inconsistent with our interest in attracting, retaining and promoting the most talented and dedicated employees.

- 3.4.2 Kenson Plastics Inc. requires that all applicants for employment and employees be treated as individuals, on the basis of their own qualifications, skills, abilities, conduct, performance and other work-related attributes, without regard to protected status.
- 3.5 DISCRIMINATION AND RETALIATION ARE PROHIBITED.
- 3.5.1 Illegal discrimination on account of any protected status is prohibited. Kenson Plastics Inc. also forbids discrimination or retaliation against employees because they have properly exercised their legal rights (such as the right to file a complaint with a government agency), or because they have opposed, in a non-disruptive manner, any unlawful action.
- 3.5.2 This policy applies to all terms and conditions of employment and to all employment practices, including recruitment, hiring, training, evaluation, promotion, transfer, discipline and termination, as well as to all forms of compensation and benefits.
- 3.5.3 All personnel are required to behave in a nondiscriminatory and business-like manner in all Kenson Plastics Inc. events, activities and company representations.
- 3.5.4 If an employee believes that he / she has been discriminated against or retaliated against or otherwise believes that this policy may have been violated, they are responsible to report the problem in accordance with the Complaint / Report Procedure described in this policy.
- 3.6 REASONABLE ACCOMMODATION FOR DISABILITIES AND RELIGIOUS BELIEFS
- 3.6.1 Kenson Plastics Inc. shall make reasonable accommodations for known physical, mental disabilities and religious beliefs of applicants / employees who are qualified and able to perform the essential functions of the job held or sought with or without reasonable accommodation and without posing a direct threat to their own safety and health or that of others, absent undue hardship.
- 3.6.2 It is a violation of this policy to discriminate against qualified job applicants or employees because they need a reasonable accommodation for a disability or religious belief.
- 3.6.3 If an employee requires job accommodation due to their religion or disability, the employee is responsible to contact Kenson Management. Normally, verification of the need for accommodation, the nature of the accommodation needed and the ability to work without posing a direct threat shall be required.
- 3.6.4 Denying reasonable accommodation to qualified applicants and / or harassing / discriminating against any qualified applicant or employee because they require a reasonable accommodation(s) are strictly prohibited.
- 3.7 NO HARASSMENT POLICY
- 3.7.1 Kenson Plastics Inc. prohibits harassment in the workplace, at work sites and in other work-related activities, such as business trips and business-related meetings and business sponsored events.
- 3.7.2 Reports and complaints of harassment and other prohibited conduct shall be promptly investigated and Kenson Management shall take appropriate actions to stop the conduct if verified. If it is determined that inappropriate conduct has occurred, Kenson Plastics shall take corrective actions as appropriate to the occurrence.
- 3.7.3 If an employee is engaged in conduct prohibited by this policy, the employee shall be subject to disciplinary action.
- 3.7.4 If an employee believes that he / she is being harassed or otherwise believes that this policy has been violated, the employee shall be responsible to report the problem immediately using the Complaint / Report Procedure described in this policy.
- 3.8 SEXUAL HARASSMENT AND OTHER INAPPROPRIATE CONDUCT ARE PROHIBITED.
- 3.8.1 Kenson Plastics Inc. prohibits sexual harassment in the workplace, at work sites and in other work-related activities, such as business trips and business-related meetings and business sponsored events.
- 3.8.2 Sexual harassment is typically defined as unwelcome sexual advances, unwelcome requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature, when one or more of the following applies:

- Submission to that conduct is made explicitly or implicitly a term or condition of employment;
 - Submission to or rejection of that conduct is used as a basis for employment decisions;
 - The conduct has the effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.
 - Sexual harassment includes a direct or implied request for sexual favors in exchange for favorable job action (such as a job, a favorable review, a salary increase or promotion or better job conditions) or in exchange for avoiding unfavorable job action (such as a demotion or termination). Any such request by a supervisor or manager is strictly prohibited, and shall result in disciplinary action or termination, without other warning.
- 3.8.3 The legal definition of sexual harassment includes other types of conduct. Sexual advances, gestures or communications may constitute unlawful sexual harassment if the conduct is:
- Unwelcomed;
 - Sufficiently severe or pervasive as to alter the conditions of employment and create a hostile, intimidating or abusive working environment, considering all of the circumstances, including the frequency of the conduct; its severity; whether it is physically threatening or humiliating or just an offensive statement and whether it unreasonably interferes with work performance.
 - Note: Isolated teasing, comments and other isolated incidents (unless extremely serious) may not constitute unlawful harassment.
- 3.8.4 Kenson Plastics Inc. prohibits unwelcome and offensive conduct which includes but may not be limited to the following:
- Physical assaults, stalking, pinching, hugging, kissing or touching in an offensive or sexual nature or rubbing up against the body or impeding or blocking movement
 - Displaying / circulating obscene or sexually-suggestive objects, pictures, cartoons, jokes, letters, notes, calendars, email or internet materials or screen savers;
 - Sexual gestures, sexually suggestive or sexually insulting comments / inquiries or sexual sounds or noises (i.e. whistles, catcalls, etc.);
 - Sexual advances and propositions, with or without physical contact;
 - Repeated flirtation or requests for dates to a person who has indicated that this is not welcome.
 - Sexual comments and jokes, written or verbal remarks about an employee's or someone else's sex life, body, or sexual experiences;
 - Threatening reprisal for a negative response to sexual advances;
- 3.8.5 If an employee believes that he / she is being sexually harassed or otherwise believes that this policy has been violated, the employee shall be responsible to report the problem immediately using our Complaint / Report Procedure described in this policy.
- 3.8.6 Kenson Plastics Inc. recognizes the suffering caused by human trafficking and slavery and are committed to ensuring that such activities shall not take place in our business and supply chains. We evaluate and address the risks of human trafficking and slavery by conducting due diligence through our sourcing evaluation process. Forbidden behaviors and acts shall include sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. Exchange of money, employment, goods, or services of sex, including sexual favors or other forms of humiliating, degrading or exploitive behavior is prohibited.

3.9 OTHER TYPES OF HARASSMENT AND INAPPROPRIATE CONDUCT ARE PROHIBITED.

3.9.1 Kenson Plastics Inc. also prohibits verbal or physical harassment of any person because of his or her race, color, ancestry, religion, gender, pregnancy, sexual orientation, protected age, national origin, citizenship, non-disqualifying disability or other protected status, where such conduct is:

- Unwelcome;
- Sufficiently severe or pervasive as to alter the conditions of employment and create an intimidating, hostile or offensive work environment, considering all of the circumstances such as those discussed in the prior section of this Policy.

3.9.2 Kenson Plastics Inc. prohibits unwelcome and offensive conduct of the following types:

- Name-calling, slurs, ridicule, insults or threatening, intimidating or hostile communications or acts made or directed to or about anyone;
- Jokes, stereotyping comments, cartoons, pictures, emails, internet materials or objects that degrade or insult members of a protected class;
- Verbal / physical assaults and intimidating statements, actions or gestures.
- If an employee believes that he / she is being harassed or otherwise believes that this policy has been violated, the employee shall be responsible to report the problem immediately using the Complaint / Report Procedure described in this policy.

3.9.3 Work Place Violence Policy:

- Violent behavior, threats of violence, or physical intimidation shall not be tolerated in the workplace.
- If such conduct occurs, it shall be promptly reported to the proper authority and investigated. Kenson Plastics shall take appropriate action in response to reports of such conduct.
- Employees found to have violated this policy shall be subject to disciplinary action, which may include immediate separation of employment, civil / criminal penalties or other appropriate action against the offender.
- Anyone who believes that he / she is a victim of threatening or violent conduct in the workplace, or who observes such behavior or believes a credible threat of such behavior exists, should immediately report the conduct to Kenson Management.

3.10 COMPLAINT / REPORT PROCEDURE

3.10.1 Any employee or applicant who believes they have been subject to or witnessed an infraction against company policy, applicable Local, State, Federal Laws / Standards or who knows of or suspects the occurrence of such infractions shall be responsible for informing their direct supervisor, the President, the VP Sales or VP Operations.

- Complaints / reports may be made in writing or verbally.
- Complaints can be made with witnesses present such as Union Representation.
- Employees may disregard the general chain of command and report the issue to the Kenson Plastics Inc. Management or through the appropriate Bargaining Unit protocol.

3.10.2. All reports of harassment, discrimination, retaliation and policy infractions shall be investigated as promptly as practicable.

3.11 NO REPRISAL – NO RETALIATION

3.11.1 Adverse job action, on the basis of such report, against any employee who has made a report in good faith is prohibited.

3.11.2 Adverse job action, against any employee who participates in good faith in the investigation of a report is also prohibited. This applies to personnel who make statements in good faith, even if they misperceived or misunderstood a statement or event.