

***Welcome new employee!***

I would like to take a moment to personally welcome you to Westward Seafoods, Inc. It is our hope that your employment here will be rewarding, both personally and professionally.

In order to assist you in your success here, please take the time to read this handbook. The handbook is an outline of our company policies and therefore, may not answer all of your questions. If you find that you have further questions, please contact your Supervisor or the Human Resources Department.

It is important to us here at WSI to maintain a solid workforce and a reliable team and we thank you in advance for bringing a positive contribution to our efforts.

Sincerely,

Rick Dutton  
President  
Westward Seafoods, Inc.

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## 040 INTRODUCTORY STATEMENT

This handbook is designed to acquaint you with WSI and provide you with information about working conditions, employee benefits, and some of the policies affecting your employment. You should read and ask questions about the provisions of this handbook. It describes many of your responsibilities as an employee and outlines the programs developed by WSI to benefit employees. One of our objectives is to provide a work environment that is conducive to both personal and professional growth.

No employee handbook can anticipate every circumstance or question about policy. As WSI continues to grow, the need may arise to change policies described in the handbook. WSI therefore reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time, or to deviate from the provisions in this handbook, as it deems appropriate, in its sole and absolute discretion. WSI will try to notify employees of changes as they occur.

### **What the Handbook Is and what the Handbook Is Not**

It is important to begin by describing what this Employee Handbook is, as well as what it is not. It...

- **IS** a summary of our organization's employment policies and procedures. It revokes and supersedes any prior summaries or statements of employment policies and procedures and will control in case of any inconsistency with other written materials (except individual employment agreements) or unwritten practices.
- **IS** an evolving document which may be revised and updated from time to time. We will try to keep you advised of changes in policies and procedures covered in this Employee Handbook through notices on bulletin board, employee meetings, and/or circulation of revised pages or a later edition.
- **IS NOT** your only source of information on employment-related issues. Although this Employee Handbook should be the best place to start in finding answers to questions, you may, from time to time, have questions that it does not answer. In those situations, you should talk with your supervisor or someone from the HR staff.
- **IS NOT a contract of employment. WSI hopes that our employment relationship with you will be ongoing and rewarding for you and the company. However, your employment is "at will" and may be terminated at any time, with or without cause, by either you or WSI.**

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## **083 OPERATIONS**

### **WSI Captain's Bay Processing Facility**

Located in Captain's Bay, Unalaska, Alaska, is the processing facility where you will be employed. WSI is engaged in the production of Surimi, Fish Meal, Crab, Pacific Cod, Sablefish, Halibut and other groundfish. The fish and crab are purchased from fishing vessels and processed at the plant. Each of the above mentioned fish are processed during specific seasons.

WSI Mailing Address: (Your Name)  
C/O Westward Seafoods, Inc.  
P.O. Box 920608  
Dutch Harbor, Alaska 99692-608

## **084 EMPLOYEE SERVICE & SUPPORT**

### **On Site**

WSI could not be a success without personnel dedicated to service and support operations on site. The Human Resource Department, Accounting and Shipping & Receiving personnel, and all of the Departmental Managers can be found in the administrative offices located on the second floor of the main plant. Housing, laundry and galley staff are usually located in the main galley area or over in the main office of the Royal Dutch Inn. Engineering staff are located in the powerhouse and the Maintenance workers can be found fixing things anytime, just about anywhere on site!

### **The Housing Office/Desk Services**

Located adjacent to the main galley is the Royal Dutch Inn. The RDI used to be a full time hotel and restaurant. Now it's primary purpose is to provide additional housing for WSI employee's, function as a back up kitchen, and to provide space for relaxation and recreation. The RDI main desk is open daily and services include an employee message center and distribution of mail. Employees are also able to purchase WSI clothing items from this location.

### **Seattle Corporate Headquarters**

The corporate headquarters of WSI are located at 2101 4<sup>th</sup> Ave. Suite 1700, Seattle, WA 98121. Based at WSI's corporate headquarters are personnel responsible for a variety of corporate activities. The corporate office also acts in a support capacity for plant operations. The departments located in Seattle are Accounting, Human Resources, Payroll, Purchasing, and Sales.

The Payroll department is responsible for providing you with an accurate payroll check in a timely manner. Purchasing deals with material vendors coordinating the acquisition of materials and shipping them to the operations site. The Human Resource department is the epitome of behind the scenes work, developing policies and procedures, setting up recruitment, arranging interviews and drug testing, coordinating transportation, etc. You remember "H.R." because it was this department that recruited, interviewed and recommended you for hire!

## **103 EQUAL EMPLOYMENT OPPORTUNITY**

### **Nondiscrimination**

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at WSI will be based on business related criteria like skills, qualifications, abilities, and job performance. Except where required or permitted by law, employment practices will not be influenced or affected by an applicant's or employee's race, color, religion, sex, sexual orientation, national origin, age, disability, genetic information, marital or veteran's status, changes in marital status, pregnancy, parenthood, or any other characteristic protected by applicable local, state or federal law.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

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

### **Reasonable Accommodations of Disabilities**

WSI is committed to complying with the federal and state laws and regulations insuring equal employment opportunity for persons with disabilities. WSI will make reasonable effort to accommodate individuals with disabilities, as defined under applicable laws.

Depending on the circumstances, reasonable accommodation may include but is not limited to providing applications in alternative accessible formats, providing assistance in completing applications, restructuring job duties and functions, reassigning qualified employees to vacant positions, providing physical aids, and granting reasonable leaves of absence. WSI makes reasonable accommodations that can be accomplished without undue hardship.

You should contact your supervisor if you have a medical condition that limits your ability to perform your essential job functions. WSI may require that you provide verification of your condition and its work-related limitations. We will engage in an interactive process with you to identify needed reasonable accommodations. If you have concerns that your supervisor or manager is not providing reasonable accommodations, please contact the Human Resources Department.

### **Religious Accommodation**

WSI will make reasonable efforts to accommodate the religious practices of our employees as required by applicable law. When an employee requests an accommodation, WSI may consider such alternatives as voluntary substitutions, flexible scheduling, or changes in job assignments. The requested accommodation, however, must be reasonable. We are not required to make any accommodation that would create an undue hardship on the conduct of our operations. Based on the particular facts in each case, we will determine whether a requested accommodation would create an undue hardship. If you have concerns that your supervisor or manager is not providing

reasonable accommodation for your religious beliefs, please contact the Human Resources Department.

## **105 HIRING OF FRIENDS & RELATIVES**

### **Friends**

If you have friends and or acquaintances who are interested in employment with WSI they must contact Human Resources in Seattle and ask for information on how to apply. Everyone, no matter what their connection or association with current employees of WSI needs to go through the hiring process and procedures. If the applicant successfully meets the minimum criteria for employment they may be offered an opportunity to interview for open positions.

### **Relatives**

The employment of relatives in the same area of an organization may cause serious conflicts and problems with favoritism and employee morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships. Moreover, WSI business interests may be compromised where relatives supervise, audit, or otherwise work in positions where their duties would present real or potential conflicts of interests.

Although WSI has no prohibition against hiring relatives of existing employees, we are committed to monitoring situations in which relatives work in the same area or in other situations that raise real or potential conflicts of interest. In case of actual or potential problems, like conflicts of interest, WSI may limit employment assignments or opportunities. This can include reassignment or, if necessary, termination of employment for one or both of the individuals involved.

For the purposes of this policy, relatives are defined to include spouses, parents, children, brothers, sisters, brothers- and sisters-in-law, fathers- and mothers-in-law, stepparents, stepbrothers, stepsisters, and stepchildren. This policy also applies to domestic partners or other individuals who may not be legally related but who reside with another employee in a relationship similar to a familial relationship.

## **106 POST-OFFER EMPLOYEE DRUG TESTING & MEDICAL EXAMINATIONS**

### **Drug Screening**

All potential processing employees must successfully pass a drug test as part of the post-offer medical examination. Results will be kept separate and maintained confidentially. This is considered a condition of hire by the company, and WSI will bear the expense. (See section 702 and 714 for further information on Drug Testing & the WSI Drug Free Workplace.)

### **Medical Examinations**

To help assure that employees are able to perform their duties safely, post job offer medical examinations are required for all new processing employees.

After an offer has been made to an applicant entering a designated job category, a medical examination will be performed at WSI's expense by a health professional of WSI's choice. The offer of employment and assignment to duties is contingent upon satisfactory completion of the exam.

Information on an employee's medical condition or history will be kept separate from other employee information and maintained confidentially.

A yearly audiogram (hearing examination) is required of all WSI processing employees.

## **107 IMMIGRATION LAW COMPLIANCE**

WSI is committed to employing only persons who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.

Therefore, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with WSI within the past three years, or if their previous I-9 is no longer retained or valid.

Employees with questions or seeking more information on immigration law issues are encouraged to contact the Human Resources Department. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

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## **180 TRANSPORTATION POLICY**

WSI provides the employee transportation from the point of hire, Seattle or Alaska, to the work site.

- (a) Upon successful completion of the employment agreement, the employee will receive a return ticket to their initial point of hire.
- (b) However, if the employee voluntarily terminates for a reason other than misrepresentation of wages, conditions of employment or lodging, or for reasons other than safety or health dangers, or is involuntarily terminated for falsification of employment application, intoxication, fighting or prolonged unexcused absence, WSI is not responsible for paying the cost of a return ticket to their point of hire. In such circumstances, the employee must purchase their own transportation back to the point of hire.



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## **201 EMPLOYMENT CATEGORIES**

WSI has developed employment classifications so that employees understand their employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time. Accordingly, the right to terminate the employment relationship at will at any time is retained by both the employee and WSI.

Each employee is designated as EXEMPT, NON-EXEMPT REGULAR, NON-EXEMPT FULL TIME/HOURLY, or NON-EXEMPT SEASONAL/HOURLY.

NON-EXEMPT employees are entitled to overtime pay under the specific provisions of federal and state laws. EXEMPT employees are excluded from overtime under specific provisions of federal and state wage and hour laws.

### **Non-Exempt Seasonal/Hourly**

A seasonal/hourly employee is one who is hired for a single season, approximately 1500 hours or till the season's closure. This is not a guarantee of hours.

### **Non-Exempt Full Time/Hourly**

A full time/hourly employee is one who is hired for a specific time frame or for successive seasons. This is not a guarantee of hours.

### **Non-Exempt Regular**

Non-exempt regular employees are those who are not in an introductory period of employment and who are regularly scheduled to work WSI's full-time schedule. This is not a guarantee of hours.

### **Exempt (Executive/Managerial/Administrative)**

An exempt employee is paid on a salary basis and is not eligible for overtime wages. Exempt employees are considered to be full-time and are primarily departmental managers and or administrators. These employees are regularly scheduled to work WSI's full-time schedule.

## **202 ACCESS TO PERSONNEL FILES**

WSI maintains personnel files on each employee. The general personnel file usually includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and wage increases, and other employment records. Medical information is maintained in a separate file from other employment records.

Personnel files are the property of WSI, and access to the information they contain is restricted. Generally, only supervisors and management personnel of WSI who have a legitimate reason to review information in the general file are allowed to do so. Employees may also review their own files. And of course WSI may disclose information from personnel files to third parties, like government agencies, when permitted or required by law.

Employees who wish to review their own file should contact the Human Resources Department. With reasonable advance notice, employees may review their own personnel files in WSI's offices and in the presence of an individual appointed by WSI to maintain the files.

## **204 PERSONNEL DATA CHANGES**

It is the responsibility of each employee to promptly notify WSI of any changes in personnel data. Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of an emergency, educational accomplishments, and other such status reports should be accurate and current at all times.

## **208 EMPLOYMENT APPLICATIONS**

WSI relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in WSI's withdrawal of a job offer or, if the person has been hired, termination of employment.

## 281 TRANSFERS & PROMOTIONS

### Transfers

As positions become available, they may be posted outside the main office. Just as with initial employment with WSI, applications will be reviewed and qualified applicants interviewed.

Please keep in mind that simply requesting to be considered for an opening does not automatically mean that the request will be granted. Preferably, employees must first qualify by completing one employment period, possessing the skills necessary to do the job, receive a recommendation from their immediate supervisor and the approval of their department manager.

Transfers or promotions must be in the best interests of not only the employee, but WSI as well. **WSI reserves the right to deny or delay an employee's transfer or promotion** until a suitable replacement can be trained to take over the vacated position.

### Promotion & Upward Mobility

WSI may promote from within and provides these opportunities so that employees can realize their full potential. When an opening occurs, employees who have expressed a desire and have shown that they have the attitude and qualifications necessary to perform the job may apply and be considered before offering employment to applicants from outside WSI.

Decisions to promote will be based on your entire record of employment, including such things as:

Attendance	Attitude	Efficiency
Safety Record	Experience	Job Performance
Cooperation	Skill	Length of Service
Overall Ability	Disciplinary Record	

## **282 SEPARATION FROM EMPLOYMENT**

Separation from employment occurs under circumstances such as a “Lay off/Work Force Reduction”, “Voluntary Quit” and “Involuntary Termination”. When you separate from employment with WSI, regardless of the circumstances surrounding your separation, WSI tries to follow the procedures outlined below:

- Complete a separation from employment form with your immediate supervisor. This form contains your forwarding address as well as the reason for your separation, eligibility and rehire status.
- Return any company assigned gear to Safety or your supervisor;
- Make an appointment with Housing to thoroughly check out of your assigned bunkhouse room.
- Clear out your bunkhouse room. WSI may not store any personal belongings, nor will the company take any responsibility if the employee stores his/her belongings with a fellow worker.
- Go to the main office and turn in all completed housing paper work; at that time you will receive a copy of your separation form and (depending upon the reason for your separation) your flight information back to your original point of hire.

### **Lay Off/Work Force Reduction**

WSI endeavors to operate its production facility for as many months out of the year as possible. Within the seafood processing industry, the type and level of production activity varies dependant upon the season. It is anticipated that it will be necessary during slow periods of production to reduce the workforce.

- Employees usually receive notice of the work force reduction from a supervisor. A “lay off” notice will be posted.
- In the event an employee works through his/her layoff date, WSI will transport the employee back to the point of hire.

### **Voluntary or Involuntary Termination of Employment**

A voluntary termination is a separation from employment initiated by the employee (you) and not the employer (WSI). This is commonly referred to as a Voluntary Quit. Employee’s who voluntarily quit are not completing their employment agreement and are therefore not eligible to return to work with WSI.

An involuntary termination is a separation from employment initiated by the employer (WSI), not the employee (You). This is commonly referred to as being “Discharged” or “Involuntarily Terminated.” Employee’s who are involuntarily terminated are not completing their employment agreement with WSI and are therefore not eligible to return to work with WSI.

The WSI employment agreement states the following:

**The employee agrees, that if the employee voluntarily terminates or is involuntarily terminated for falsification of employment application, intoxication, fighting or prolonged absence, the employee will not be entitled to receive a return ticket to their point of hire. The employee agrees to purchase their own transportation back to the point of hire.**

### **Eligibility for Rehire**

Rehire eligibility will depend on the circumstances that initiated your departure from WSI. If you voluntarily terminate, (i.e. you quit) you will have failed to complete your contract. Therefore, you will be ineligible for rehire.

If you are part of a work force reduction, (i.e. part of a “lay off”) and you have a good or higher work performance rating, you may be recommended for rehire.

When hiring begins for the next season, those employees who are eligible and recommended for rehire may be given the opportunity to return to work.

**Please remember that it is the employee’s responsibility to keep the WSI/Seattle Human Resource department informed of your availability to work and your most current address and phone number.**

### **General Return to Work Procedures**

#### **Rehire Selection Criteria:**

- Performance rating of “good” (28) or better.
- Must be considered “Eligible for Rehire” on last separation.
- Must provide proper requested or required documentation.
- YOU MUST CALL HR Seattle to arrange for Drug Screen &/or Audiogram (hearing) appointments.
- You must go to the appointments at the scheduled times.
- You must successfully pass the “Return to Duty” Drug Screen.

Following the rehire steps will help you to successfully return to work.

### 313 BENEFITS

#### Health Insurance

WSI sponsors medical, dental, vision and prescription drug insurance plans for eligible employees. To be eligible for insurance you must be employed in an Exempt, Non-Exempt Regular, Non-Exempt Seasonal/Hourly or Non-Exempt Full Time/Hourly position and:

- Be employed by WSI on other than a temporary or part-time basis; and
- Regularly scheduled to work for WSI for at least 35-40 hours a week.

WSI Non-Exempt Regular members will be eligible on the first of the calendar month following completion of ninety (90) days of continuous active work. WSI Nonexempt Seasonal/Hourly & Full Time/Hourly employees' eligibility begins on the first of the calendar month following the completion of 2080 regular time hours worked. WSI Exempt staff eligibility begins on the first of the calendar month following completion of thirty (30) days of continuous active work. Human Resources keeps track of employee's hours toward insurance eligibility. Please see the HR Clerk for further details on enrollment and coverage.

#### Benefits Continuation (COBRA)

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

Under COBRA, the employee or beneficiary pays the full cost of coverage at WSI's group rates plus an administration fee in order to continue health insurance coverage after a qualifying event.

WSI provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under WSI's health insurance plan. The notice contains important information about the employee's rights and obligations. In order to elect COBRA coverage employees need to properly fill out the COBRA enrollment form and send into the provider (listed on the form) with the correct premium amount. By maintaining their insurance through COBRA coverage, employee's then become eligible to come back on the company plan on the first of the month following their return to work. Employee's who fail to maintain their coverage or become delinquent in their COBRA payments and are not re-employed by WSI within 6 months, **will not** be eligible to come back on the company-provided insurance plan. Most employee's who are terminated off the insurance and do not maintain or become delinquent on their COBRA payments will have to earn 2080 regular time hours to once again become eligible for insurance.

## 314 LEAVES OF ABSENCE

### Family and Medical Leave

An employee who has worked for WSI at least twelve months, including at least 1250 hours in the last twelve months and worked at a location where there are more than 50 employees in a 75-mile radius, may be entitled to 12 workweeks of unpaid leave in any twelve- consecutive-month period (a rolling 12-month period):

- to care for a newborn or newly-adopted child or newly-placed foster child,
- to care for a child, parent or spouse who has a serious health condition or
- because of the employee's own serious health condition.

A "serious health condition" is an illness, impairment or condition that involves inpatient care in a hospital, hospice or residential medical care facility or continuing treatment by a health care provider, any period of incapacity of three or more consecutive days and continuing care by a medical provider, as well as any period of incapacity due to pregnancy including prenatal care.

Employees may also take up to 12 weeks FMLA leave when they experience a qualifying exigency arising out of the fact that their spouse, parent or child is on or has been called to covered active duty in the Reserves, National Guard or as a member of the regular Armed Forces. A qualifying exigency is a non-medical activity directly related to the relative's covered active duty status or call to covered active duty. It includes attending certain military events and related activities, attending family support and assistance programs, arranging for temporary childcare, addressing legal and financial arrangements, attending counseling related to the deployment, rest and recuperation with the service member on leave from deployment and attending post-deployment briefings. Such employees may be required to provide certification that their family member is in the military and has been called to covered active duty.

In addition, eligible employees are entitled to up to 26 weeks of family medical leave in a single 12 month period to care for an employee's spouse, child, parent (as defined under FMLA) or next of kin (defined as a person for whom the employee is the nearest blood relative) who is or was a member of the Armed Forces (including members of the National Guard or Reserves) and is undergoing medical treatment, recuperation, or therapy, for a service-related serious injury or illness. The veteran needs to have been a member of the Armed Forces at any time during the five-year period preceding the date of treatment, recuperation or therapy for such injury.

Leave to care for a newborn, newly adopted child or newly placed foster child must be taken within twelve months of the birth, adoption or placement. If WSI employs both parents, they are together entitled to 12 workweeks of unpaid leave under this paragraph.

If the need for the leave is foreseeable, employees must give at least 30 days' written notice in advance of the anticipated date the leave is to begin stating the reason for the leave and the dates during which the leave is to be taken. If the need for the leave is not foreseeable, the employee must give notice as soon as possible after the need for the leave is known. Health care provider certifications/recertifications, as well as second/third opinions and fitness for duty reports/releases may be required in accordance with the FMLA regulations.

Upon returning from the leave, an employee is entitled to return to the same position held when the leave began or to an equivalent position with equivalent benefits and pay, unless the employee would have experienced a seasonal layoff or the employee's position would have otherwise been eliminated had the employee not been on leave. Additionally an employee on leave is not immune from discipline, up to and including termination, if information is uncovered during the leave which would have normally resulted in discipline had the employee been actively working.

The employee must use any other accumulated leave, paid or unpaid, to which he or she is otherwise entitled while on this leave. Otherwise, the leave is unpaid. If leave pursuant to this policy would also qualify as leave under any other benefit or policy, the period of the leave will apply toward the entitlement for each type of leave that may apply.

By taking the leave, the employee will not lose any benefits that accrued before the start of the leave. The employee will not be entitled to accrue further benefits during periods of unpaid leave. WSI will maintain its contributions to your health insurance premiums during the leave, whether it is paid or unpaid. The employee will be required to continue his or her share of the premiums for the employee and his or her dependents, if applicable. The employee will also be required to arrange in advance self-payment of other group insurance benefits. If the employee does not return at the end of the leave, the employee may be required to repay WSI for the health insurance premiums paid during the leave.

This policy will be administered according to the Family and Medical Leave Act and the regulations interpreting it and any applicable state law. Employees should contact the Human Resources Department with questions about eligibility for leave or other leave benefits that may be available.

### **Non-FMLA Medical Leave**

Employees who are ineligible for FMLA leave, but need time off from work due to their own serious illness or injury may be granted a non-FMLA medical leave. The leave is unpaid unless the employee has available vacation and sick leave (which must be used during this leave). Where the employee's condition qualifies as a disability, this policy will be administered according to general principles of reasonable accommodation. Please remember that any non-FMLA Medical Leave automatically ends at the point at which a seasonal processing employee would have been normally laid off. Employees should contact the Human Resources Department with questions about non-FMLA medical leave.

## **380 RETIREMENT -- 401(K) PLAN**

The WSI 401(K) Retirement Plan has been adopted to provide a means for employees to save for their retirement. The 401(K) plan allows employees to take an active part in accumulating retirement savings with pre-tax dollars. By doing so, employees can defer payment of the tax on those dollars until retirement, when they may be in a lower tax bracket. The base part of the plan is the employee deferral or 401(K) portion of the plan. WSI encourages eligible employees to save for retirement by offering a contribution in direct proportion to the contribution that you make.



Quarterly, company representatives will provide a 401(K) plan orientation for all eligible employees. Eligible employees must meet the following criteria: have been with WSI for 3 months, and are at least 21 years old. Note: Employees are eligible to enroll in the 401K on the first enrollment period following 3 months of employment, but WSI will not begin matching contributions until the first enrollment period following 12 months from hire date. At the orientation plan booklets, sign up sheets and financial investment information will be provided.

See the Human Resources for further details.

#### **401 TIMEKEEPING**

Accurately recording time worked is the responsibility of every Non-Exempt Regular, Full Time/Hourly and Seasonal/Hourly employee. Non-Exempt Regular, Full Time/Hourly & Seasonal/Hourly employees should accurately record the time they begin and end their work, as well as the beginning and ending time of each meal period. They should also record the beginning and ending time of any split shift or departure from work for personal reasons.

Federal and state laws require WSI to keep an accurate record of time worked in order to calculate employee pay and benefits. All Non-Exempt Regular, Full Time/Hourly and Seasonal/Hourly employees are provided a time card for this purpose. Time worked is all the time actually spent on the job performing assigned duties.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Non-Exempt Regular, Full Time/Hourly & Seasonal/Hourly employees should report to work no more than ten minutes prior to their scheduled starting time nor stay more than ten minutes after their scheduled stop time without expressed, prior authorization from their supervisor.

It is the employee's responsibility to sign his or her time record to certify the accuracy of all time recorded. Supervisors review and initial time records before submitting them for payroll processing. In addition, if corrections or modifications are made to the time record, both the employee and the supervisor should verify the accuracy of the changes by initialing the time record.

#### **Clocking In & Out**

At the onset of employment all Non-Exempt Regular, Full Time/Hourly & Seasonal/Hourly employees will be provided with a "Time Card". Employees may not "Clock In or Out" for a fellow employee. At the start of a shift, employees must "Clock In"; at the end of a shift, employees must "Clock Out". **Employee's must also clock "out/in" for meal periods.** Time card misuse, i.e., failing to properly clock "in/out" and/or falsifying time worked, may result in disciplinary action up to and including termination.

#### **Meals and Breaks**

Nonexempt employees receive a 10 minute paid break for each 6 hours worked. They also receive a 30 minute unpaid meal period.

#### **409 ADMINISTRATIVE PAY CORRECTIONS**

WSI takes all reasonable steps to assure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday.

In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of WSI so that corrections can be made as quickly as possible.

Once an underpayment is identified, it will be corrected in the next regular paycheck.

Any overpayment also needs to be promptly reported and will also be corrected in the next regular paycheck unless this presents a burden to the employee (where there is a substantial amount owed). In that case, WSI may attempt to arrange a schedule of repayments with the employee to minimize the inconvenience to all involved.

WESTWARD SEAFOODS, INC.

#### **410 PAYROLL DEDUCTIONS & GARNISHMENTS**

The law requires that WSI make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. WSI also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." WSI matches the amount of Social Security taxes paid by each employee. Employees need to provide a valid social security number to WSI.

WSI offers programs and benefits beyond those required by law. Employees authorize deductions from their pay checks to cover the costs of participation in voluntary programs.

Garnishments are pay deductions required by law and taken by WSI, usually to help pay off a debt or obligation to an organization other than WSI.

If you have questions concerning why deductions were made from your pay check or how they were calculated, Payroll/Human Resource Clerk can assist in having your questions answered.

## **501 SAFETY**

To provide a safe and healthful work environment for employees, customers, and visitors, WSI has established a workplace safety program. This program is a top priority for WSI. The Corporate Safety Manager has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

WSI provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. The "Safety Committee," a safety advisory group, has been established to assist in these activities and to facilitate effective communication between employees and management about workplace safety and health issues.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees must immediately notify the Safety Department and the appropriate supervisor. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

### **Safety First!**

At WSI, safety is everyone's responsibility. To prevent accidents and to keep the work environment free from danger, everyone is encouraged to create a safe working environment. In order to ensure a safe environment, your supervisor should instruct you as to how to properly handle the equipment. To ensure your own safety and as a conscientious employee, your responsibilities are as follows:

### **Employee Safety**

- Ask questions! When it comes to safety there is no such thing as a dumb question.
- Adhere to all established safe work practices & procedures.
- Immediately inform your supervisor of any unsafe working conditions.
- Immediately inform your supervisor of any unsafe behaviors of other employees.
- Always wear your assigned protective gear. (Head, Hair, Eye, Ear, & Lung)
- DO NOT, under any circumstances wear loose or tattered clothing.
- DO NOT, wear loose or dangling jewelry on your fingers, around your neck or your wrists.
- Walk, never run inside the plant.
- Remain alert and aware at all times.

- Refrain from horseplay within the plant.
- Lift with your legs, not your back! Get help with heavy loads or objects.
- Maintain a clean work place.
- Regularly attend safety meetings.

### **WSI Safety Meetings**

WSI employees take part in a weekly safety meeting. These meetings are conducted to increase the general awareness of all the employees and to establish a safety-conscious work environment. A variety of topics are discussed at safety meetings, including but not limited to:

- Proper Lifting Techniques
- Head, Hair, Eye, Ear & Lung Protection
- Preventing Repetitive Motion Injury
- Avoiding Slips & Falls
- Forklift, Crane & Vehicle Safety
- Fire Alarm & Emergency Response Procedures
- Chemical & Electrical Safety
- Dock Policy & Procedures
- Cold Storage & Power Generation Safety

### **WSI Safety Committee**

The WSI safety committee is made up of representatives from the staff living and working at the processing facility. The safety committee meets once a month to discuss safety issues, suggest topics for plant safety workshops and make recommendations for increasing the safety of the work environment. The committee is responsible for distributing safety education materials and updating the safety bulletin boards. Let your supervisor know if you are interested in joining the Safety Committee.

In general, the goals of the safety committee are to:

- Enhance safety awareness among fellow employees.
- Define problems and obstacles to safety.
- Identify safety hazards.
- Recommend and offer solutions to obstacles, problems, and safety hazards.
- Assist in identifying training needs of employees.
- Serve as an advisory panel to the Corporate Safety Manager and department Managers.

### **Machine Safety**

- Be certain you have a good understanding of the equipment before operating it.
- Use the right tools and equipment for the job.
- Know and understand how to turn on/off the equipment you are working with.
- Know and understand any machinery within your immediate work area.
- Comply with all equipment lock/out & tag/out procedures.
- Check to make sure workers are clear before starting up any machinery.
- If the equipment you are operating has been turned off, prior to restarting the machinery all employees in the immediate area to remain a safe distance from the machinery that is gearing up.

- See that machine guards are in place before operating machinery.
- Never remove safety features or other protective barriers from the operating equipment.
- Never reach into the operating equipment to repair, dislodge or adjust the machinery while it is moving or turned on.
- If there is a problem with the equipment, notify your supervisor and they will address the problem.

**Forklift Safety**

- Forklifts may only be driven by certified forklift drivers.
- Never “Hop” or “Hitch” a ride on a moving forklift.
- Remain alert and aware when working in areas frequently traveled by forklifts.
- As a pedestrian walking through the plant, always remember that a moving forklift has the right of way.

## **502 WORK SCHEDULES**

Work schedules for employees vary throughout our organization. Supervisors will advise employees of their shift start and end time. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week.

Prompt, reliable attendance is required. Work is carried on continuously when fish are available. While there is no minimum guarantee of hours, the employee agrees to work during busy periods, as many hours as requested.

If you have any questions or concerns about your schedule check with your supervisor.

## **507 OVERTIME**

When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime. When possible, advance notification of these mandatory assignments will be provided. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work.

Overtime compensation is paid to all nonexempt employees in accordance with federal and state wage and hour restrictions. As required by law, overtime pay is based on actual hours worked. Time off due to illness or injury, personal reasons, holidays, vacations, or any leave of absence will not be considered hours worked for purposes of computing overtime.

## **508 USE OF EQUIPMENT AND VEHICLES**

Equipment and vehicles essential in accomplishing job duties are expensive and may be difficult to replace. When using WSI property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

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

The improper, careless, negligent, destructive, or unsafe use or operation of equipment or vehicles, as well as excessive or avoidable traffic and parking violations, can result in disciplinary action, up to and including termination of employment.



### **513 GUEST VISITATION POLICY & PROCEDURE**

(For purposes of this policy “Guest” includes an employee’s spouse/domestic partner, parents, children & friends.)

#### **Policy:**

WSI employees assigned to single status bunkhouse rooms, one or two bedroom apartments or townhouses may request to have their spouse/domestic partner, parents, children or friend (hereby referred to as Employee Guests or Guest) accompanying them while living in their company-provided housing unit. Employee’s request must be presented in writing and approved by the Plant Manager prior to the Employee Guest’s intended arrival on site. Employee Guests are subject to the WSI rules and regulations & the WSI drug free work place as outlined in the company handbook & the Guest Registration Packet. Failure of an Employee Guest to comply with company policies may result in rescission of the Employee Guest’s visitation privileges.

In the event that space is needed to house employees, WSI reserves the right to deny or to rescind an Employee Guest’s visitation privileges.

#### **Procedure:**

Employee requests, in writing, Guest visitation privilege. Only employees living in apartments, townhouses or in single status bunkhouse rooms may request Guest visitation privileges.

Employee’s request must outline:

- Who will be accompanying them in the unit; their Guest’s name and relation to the employee; i.e., spouse/domestic partner, parent, child or friend;
- The Guest’s intended date of arrival, duration of their proposed stay & date of departure (when appropriate);

Following approval by the Plant Manager, the Employee should inform their Guest of the following:

- While residing in WSI housing the Employee Guest is subject to the company rules and regulations as outlined in the Guest Registration Packet, the WSI handbook, WSI Drug Free Workplace Policy, and Guest rules. Failure to comply with company rules and regulations may result in rescission of the Guest’s housing privileges.

Once the Employee Guest is on site:

- The Employee must make immediate arrangements with the Safety Department for their guest to take a drug screen test.
- The Employee must accompany their Guest to the RDI Housing office to assure that all Guest registration & agreement forms are properly completed.
- The Employee must purchase a meal voucher unless the employee is assigned to a housing unit with a kitchen. Meal Vouchers are available from the front desk at the main plant office. The Guest must use the meal voucher when dining in the Main Galley or the RDI Galley.
- The Employee must be responsible for their Guest while residing in company-provided housing; any costs of repair or damage to the company-provided housing unit will remain the sole responsibility of the WSI employee.

## **514 VISITORS IN THE WORKPLACE**

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

Because of safety and security reasons, family and friends of employees are discouraged from visiting the plant. In cases of emergency, employees will be called to meet any visitor outside their work area.

All visitors should enter WSI via the main office located on the second floor of the processing plant. Authorized visitors will receive directions or be escorted to their destination. Employees are responsible for the conduct and safety of their visitors.

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

## **515 SOLICITATIONS**

To provide a safe workplace and to ensure employees are not interrupted during work time, WSI does not permit solicitation or distribution of literature on its property by persons not employed by the Company. This prohibition includes charity solicitors, insurance sales persons, union organizers, surveyor questionnaire takers, or other forms of solicitation and distribution by nonemployees.

Additionally, employees may not solicit each other for any purpose during their own or another employee's working time. Working time is defined as the time an employee spends in performance of his or her duties and does not include break periods and meal periods. Reasonable forms of solicitation between employees are permitted during non-work time, such as before or after work or during meal and break periods. Employees may not, however, distribute literature during work time, and any distribution of literature by an employee during a non-work time must take place in a non-working area. Break rooms are non-work areas.

## **580 HEALTH MATTERS**

### **Community Health Services**

The Illiuliuk Clinic is the primary medical provider in the Unalaska community. The clinic is usually staffed by two Physicians Assistants, and licensed Nursing staff. Physician(s) and dentist(s) may also rotate through the clinic. There is also a Chiropractor providing services full-time to the community.

### **Illness & or Injury: On or Off The Clock**

If, while at work, you become sick or if you are in any way injured, notify your supervisor immediately. For serious injuries that require immediate attention, there are trained staff who are available to attend to your needs. When you inform your supervisor you do not feel well or that you have been injured in some way, you will be instructed to go to the plant's main office and speak to Human Resources or Safety. They will assist you in getting the care that you need.

If the injury or illness IS WORK RELATED the care you receive will be covered through Workers Compensation. The Safety Department will provide you with any necessary illness/injury forms and a Purchase Order indicating that WSI will pay for the required medical care.

Remember:

- (a) An employee must report any illness that would keep him/her from working. The employee needs to notify his/her supervisor in person, in advance of the start of the shift.
- (b) Any illness or injury, no matter how insignificant it may seem, must be reported immediately to the shift supervisor. Medical attention will be given and an illness/injury report will be completed by all involved parties.

If the illness or injury IS NOT WORK RELATED the cost of any care you receive from the clinic will be your responsibility. As feasible, time off may be granted for you to seek care and recuperate as directed by the medical personnel.

## 701 EMPLOYEE CONDUCT AND WORK RULES

**General Standards of Conduct.** To assure orderly operations and a good work environment, WSI expects employees to conduct themselves in ways that will protect the interests and safety of all employees and the organization. Employees are expected to follow all reasonable health, safety and living standards set by the Company, and employees shall, in no circumstances, commit any action which endangers the safety of other employees. Employees must keep their living quarters neat & clean; refrain from using abusive language; and refrain from harassing or discriminating against another employee.

**Unauthorized Conduct and Behaviors.** The following are examples of unauthorized conduct are expressly prohibited, and usually result in discharge.

- Use or possession on company premises of any illegal drugs or substances;
- Use or possession on company premises of any firearms; (or any item deemed by WSI to constitute a dangerous weapon)
- Intoxication on or about the company work premises;
- Prolonged, unexcused absences from duties;
- Harassing or discriminating against any employee;
- Fighting; and
- Destruction of property belonging to other employees or WSI.

This list is not all exclusive. Other misconduct or performance problems may result in discharge.

It is not possible to list all the behaviors that are considered unacceptable in the workplace. The following are examples of other behaviors that may result in disciplinary action, up to and including termination of employment.

- Dishonesty.
- Violation of the company controlled substances and or alcohol policies.
- Violation of the company bunkhouse policies.
- Falsification of company records, such as time cards, pay records, and identity and employment eligibility documents.
- Failure to follow established safety and quality control measures.
- Absenteeism or any absence without notice and/or unauthorized absence from work station during the workday with or without supervisor's authorization.
- Unauthorized removal of company equipment or property.
- Theft.
- Willful or grossly negligent damage to company property and/or having knowledge of and failing to report willful or grossly negligent damage.
- Threat of, or actual physical violence.
- Verbal or physical abuse based on race, religion, color, creed, sex, sexual orientation, age, or any other legally protected characteristic.
- Sleeping while on the job.
- Smoking in unauthorized areas.
- Unlawful wagering or gambling as defined by Alaska statute (AS 11.66.200).
- Accumulation of three written warnings for related and/or unrelated infractions.

- Possession of \*dangerous weapons on the job or on company property.
- Insubordination or other disrespectful conduct.
- Unauthorized use of telephones, computer system, mail system, or other employer-owned equipment.
- Unauthorized disclosure of business “secrets” or confidential information.
- Unsatisfactory job performance.

Please remember this list is also non-exhaustive. Other behaviors may result in discipline up to and including discharge. Whether discipline less than discharge is used will be determined by the company based on its assessment of relevant circumstances.

## **702 DRUG FREE WORK PLACE**

In order to assure a safe and efficient work environment, WSI has adopted a Drug Free Work Place Policy.

WSI believes that the misuse of drugs and alcohol can adversely impact workplace safety and health of employees and visitors. WSI supports an employee seeking referral for professional medical treatment for drug and alcohol use. However, our commitment to personal assistance does not excuse any misconduct or performance problem of an employee, particularly when the employee does not first come forward voluntarily to management and ask for help with their drug or alcohol misuse.

Employees with questions or concerns about drug or alcohol misuse are encouraged to discuss these matters with their supervisor or the Human Resources Department to request assistance or referrals to appropriate resources in the community.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of, disciplinary action may request approval from the Human Resources Department to take a leave of absence to participate in a rehabilitation or treatment program. Leave may be granted if the employee agrees to abstain from use of the problem substance, follows all WSI policies, rules and prohibitions relating to performance or conduct in the workplace, and the granting of the leave will not cause WSI undue hardship.

### **Drug & Alcohol Prohibitions**

WSI specifically prohibits the following, and will discipline an employee up to and including discharge for any of the following:

- Use, possession, manufacture, distribution or sale of:
  - illegal drugs or drug paraphernalia
  - unauthorized controlled substances on WSI premises, on WSI business, in WSI supplied vehicles or during WSI established working hours.
- Use, possession, manufacture, distribution, dispensation or sale of alcohol at the job site, during working hours, on WSI business, or in WSI supplied vehicles. Exception: Manufacturer sealed containers of alcohol may be transported during non working hours, by authorized staff, in the trunk or other area of WSI vehicles making it inaccessible while the vehicle is being driven. Alcohol may also be possessed and consumed during nonworking hours in sleeping quarters within the WSI bunkhouse, or WSI apartments or townhomes.
- The parking of WSI vehicles in front of bars, cocktail lounges and taverns.
- Storing in sleeping quarter, or locker, desk or automobile, or other repository on WSI premises any illegal drug, drug paraphernalia, or any controlled substance whose use is unauthorized.

- Refusing to submit to an inspection of any sleeping quarter, locker, desk, automobile, or other repository that is requested by management.
- Being under the influence of an unauthorized controlled substance, illegal drug, or alcohol (over .04 blood alcohol concentration level) in the plant, on WSI business, in WSI supplied vehicles, or during working hours.
- Use of alcohol off WSI property that adversely affects the employee's work performance, his/her or others' safety at work, or the company's reputation in the community.
- Possession, use, manufacture, distribution, dispensation, or sale of drugs off WSI property that adversely affects the employee's work performance, his/her own or others' safety at work, or WSI's reputation in the community.
- Adulteration or switching of any sample submitted for drug or alcohol testing.
- Refusing to consent to or to submit a breath, saliva, urine or blood sample for testing when requested by WSI.
- Conviction under any criminal drug statute.
- Arrest under any criminal drug statute under circumstances which adversely affect WSI reputation in the community.
- Failure to notify WSI of conviction under any criminal drug statute within five (5) days of the conviction.
- Failure to keep prescribed medication in its original container with a label that states the name of the drug, the frequency of dosage, the date prescribed, name of prescribing physician and the name of the employee.
- Refusing to sign a statement agreeing to comply with WSI's Drug Free Workplace policy.
- Refusing to complete a consent form prior to drug/alcohol testing.
- Refusing to complete the toxicology chain of custody form after submission of a urine or blood specimen.

**Note:** The legal use of prescribed drugs is permitted on the job if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the work place. Employees should advise their supervisor if they are using a prescription drug that adversely affects their ability to perform essential job functions, so that WSI may explore the availability of reasonable accommodations.

Employees with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their supervisor or the Human Resources Department without fear of reprisal.

### 703 ANTI-HARASSMENT POLICY

Westward Seafoods, Inc. is committed to providing a harassment-free work environment for all of its employees. To this end, WSI prohibits harassment that is sexual in nature, as well as harassment that is based upon race, color, religion, sexual orientation, national origin, age, disability, or other characteristics protected by applicable local, state and federal laws. Such harassment demeans individuals, negatively impacts morale, and undermines the effective, efficient operation of our business. WSI employees must not engage in prohibited harassment. Persons harassing others on any protected basis will be dealt with promptly.

Sexual Harassment is defined as: **Unwelcome sexual advances, requests for sexual favors, or other verbal, physical or visual conduct of a sexual nature when:**

- **submission to such conduct is made a condition of an individual's employment; or**
- **submission to or rejection of such conduct is used as a basis for making employment decisions affecting the individual; or**
- **such conduct -- intentionally or unintentionally -- unreasonably interferes with an individual's work performance, or creates an intimidating, hostile or offensive working environment.**

Harassment based on other protected characteristics generally includes unsolicited and offensive remarks, gestures, physical contact, display or circulation of written materials, pictures or cartoons, photographs, or other offensive matter/conduct that is based upon or directed toward a particular race, color, religion, gender, national origin, sexual orientation, age, disability or other basis protected by law.

Anyone who is aware of any instance of sexual or other harassment must report the matter **IMMEDIATELY** to any member of the Human Resources department – either on site or at headquarters.

All complaints of harassment will be investigated promptly and, upon completion of the investigation, the appropriate parties will be notified of the findings. Any supervisor, employee, or other individual affiliated with WSI who has been found to have harassed another individual will be subject to appropriate corrective action, up to and including termination of employment.

No employee who in good faith complains of harassment will suffer retaliation for reporting such harassment. Employees who feel they have been retaliated against must also immediately report such concerns to Human Resources.

WSI expects what all of its employees and affiliates will at all times act responsibly to maintain a pleasant, cooperative working environment, free from discrimination and harassment of any kind, which allows each employee to perform to his/her maximum potential.

WSI is committed to ensuring a harassment-free workplace. Those with questions regarding this anti-harassment policy should contact a member of the Human Resources department.



#### **704 ATTENDANCE AND PUNCTUALITY**

To maintain a safe and productive work environment, WSI expects employees to be reliable and to be punctual in reporting for scheduled work. Regular and predictable attendance is an essential function of all WSI jobs. Absenteeism and tardiness place a burden on other employees and on WSI. In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their supervisor as soon as possible in advance of the anticipated tardiness or absence.

Poor attendance, unauthorized absences, walking off the job without permission, returning late or not returning at all from break periods, and tardiness are disruptive. Any of these problems may lead to disciplinary action, up to and including termination of employment.

#### **705 WORKPLACE VIOLENCE**

Out of our concern for our employees, WSI has taken steps to prevent incidents of violence from occurring at its workplace. In this connection, WSI tries to maintain a zero-tolerance policy towards work place violence. We prohibit acts or threats of violence by current and former employees or non-employees against our employees in or about our facilities or premises. We do not condone acts or threats of violence against our employees. We take this policy seriously and expect our employees to do the same.

The following forms of conduct are prohibited. Please note that this list is not exhaustive. The examples are illustrative:

- Intentional acts causing or likely to cause physical injury to another;
- Threats (whether serious or made in jest) to engage in acts causing or likely to cause physical harm;
- Physical harm to another;
- Intimidation, harassment, verbal abuse or psychological abuse of another; or
- Possession of explosives, firearms or other weapons on WSI property.

Violators will be subject to disciplinary action, up to and including discharge. Where appropriate, WSI will pursue legal charges against offenders, including but not limited to, the filing of criminal charges.

Employees are expected to alert their supervisors, security personnel or Human Resources of any suspicious workplace activity or situations or incidents that they observe or that they are aware of that involve other employees, former employees, or customers or visitors that appear problematic. This includes, for example, threats or acts of violence, aggressive behavior, offensive acts,

threatening or offensive comments or remarks, and the like. Failure to report such behavior may result in disciplinary action. Where practical and appropriate under the circumstances, WSI will try to preserve the confidentiality of personnel reporting such prohibited conduct or suspicious behavior. The Company does not condone retaliation against employees for making good faith reports or concerns about work place violence.

## 714 DRUG/ALCOHOL TESTING

WSI is committed to providing a safe, efficient, and productive work environment for all employees. In keeping with this commitment, job applicants may be asked to provide body substance samples (e.g., breath, saliva, blood, urine) to determine the illicit use of drugs and employees may be required to provide bodily substance samples to determine illicit drug use or the use of alcohol in violation of WSI Drug Free workplace policy. WSI will attempt to protect the confidentiality of all test results. Whether a test is “positive” will be determined by the company’s medical review office. Tests may be conducted in any of the following situations:

**Pre-Employment** - As part of a post-offer medical examination, a prospective processing employee is required to provide a body substance sample for drug testing. Refusal to submit to such testing will make it impossible to fully evaluate the applicant, foreclosing any further action on his/her employment. No applicant with a positive drug test will be eligible to assume a position at WSI. This does not preclude an applicant from re-applying for a job at WSI after a six (6) month waiting period.

**Post-Accident** - Any current employee who is involved in an incident or accident while on duty, (whether on or off WSI’s premises), that raises a reasonable belief that drug or alcohol use may have contributed to the accident may be required to undergo drug and/or alcohol testing. Examples of accidents or incidents include those that require a visit to the clinic, the submission of a Workers Compensation report, or involve damage in excess of \$250 to property. Such tests should be conducted as soon as practical after the accident or incident. The employee will be found to be in violation, if tests for drugs and or alcohol are positive.

**Reasonable Cause/Fitness-For-Duty** – Any employee who WSI reasonably suspects may be affected by the use of drugs or alcohol which may adversely affect job performance, safety, or the work environment, may be required to submit to a drug and/or alcohol test. This includes instances when an employee demonstrates behavior that leads to the conclusion that the employee has used drugs or alcohol prior to or during work time. Reasonable suspicion/fitness for duty testing is also conducted to identify employees who may pose a danger to themselves or others. Such employees are relieved of duty, pending further action.

**Return-To-Work** - Whenever an employee is returning to work following a formal leave period (rotation, vacation) of thirty (30) days or longer, return to work drug testing will take place. If an employee has elected to remain on site, for consecutive periods of employment (like one year or 12 months) or has rotated off site for less than thirty (30) days, then in order to continue to work, the employee will also be required to submit for drug testing a body substance sample. (Breath, saliva, urine or blood specimen) The employee will be found to be in violation, if tests for drugs are positive.

**Other** – Whenever drug or alcohol testing is necessary to maintain safety for employees, business associates or the public. Whenever drug or alcohol testing is necessary to maintain productivity, the quality of WSI products and services, or the security of WSI’s property or information.

A refusal to participate in drug or alcohol testing may result in immediate termination of employment, or in the case of a prospective employee, withdrawal of a conditional job offer. Adulteration or switching of a test specimen will be treated as a refusal to participate in drug or alcohol testing. A prospective employee who tests positive for prohibited drugs will be deemed ineligible for employment for a period of no less than six months.

An employee who tests positive for prohibited drugs or alcohol use is subject to termination without prior discipline. Employees who violate other sections of the WSI Drug Free Workplace Policy (see Section 702) are also subject to termination without prior discipline.

WSI will provide written drug or alcohol test results to an employee within five working days after receipt of a written request, if the employee's request is made within six months after the test has been taken.

Employees will be provided, upon request from the employee, with an opportunity to explain, in a confidential setting, a positive test result, if the employee requests in writing an opportunity to explain the positive test result within 10 working days after the employee is notified of the positive test result. The opportunity to explain the positive test result, in a confidential setting, will be provided within 72 hours after receipt of the employee's written request.

Prospective employees will be tested for the presence of marijuana, cocaine, opiates, codeine, heroine, morphine, amphetamines, and phencyclidine. Active employees will be tested for the presence of marijuana, cocaine, opiates, codeine, heroine, morphine, amphetamines, phencyclidine, and alcohol.

Drug and alcohol testing will be conducted and samples collected pursuant Alaska Statute 23.10.600-23.10.699, which is incorporated by reference into this drug testing policy. These procedures include an employee's right to request review of confirmatory drug tests by a licensed physician or Doctor of Osteopathy after an initial positive drug test result. Copies of the alcohol testing procedures and Alaska Statute 23.10.600-23.10.699 are available from Human Resources upon request.

All drug and alcohol tests, including relevant communications regarding such test results, are confidential and privileged communications that will not be disclosed except: to the tested employee or prospective employee or another person designated in writing by the employee or prospective employee; to individuals designated by WSI to receive and evaluate test results or hear the explanation of the employee or prospective employee; or as ordered by a court or governmental agency.

All drug and alcohol tests results, including all relevant communications regarding such tests results, will be maintained in the employee's confidential medical file.

Nothing in this policy is intended to require drug testing before an employee may be disciplined up to and including termination, for suspected drug or alcohol use that is supported by other evidence.

Questions regarding this policy should be directed to the Human Resource Department.

## **780 DISCIPLINE**

WSI hopes that all employees are intelligent adults who have pride and self-respect. At WSI, we believe that an intelligent adult with pride and self-respect should perform excellent work and follow the company's policies and procedures. We also believe that employees who have pride and self-respect will quickly correct any deficiencies in their work or correct violations of company policies if these problems are brought to their attention.

Unsatisfactory work performance, misconduct or other inappropriate work behaviors indicate that the employee lacks pride and self-respect, and WSI may discontinue the employment of such individuals.

WSI may warn employees that their work, conduct or behavior is unacceptable and give them a chance to improve. However, depending on the severity of the infraction WSI reserves the right to terminate employment without prior warning. Warnings before termination may include the following:

“Friendly” Verbal Warning

Written Warning

Disciplinary Action/Notice

Whether any or all of these are utilized prior to termination is within the discretion of WSI.

### **Friendly/Verbal Warning**

Supervisors may provide employees with a “friendly” verbal warning when an employee's conduct is unacceptable. The supervisor should make a note of the warning and discuss it with that employee during or following his/her shift.

### **Written Warning**

Supervisors may use a written warning when an employee's work performance, behavior or conduct is unacceptable. The employee should be given a written statement describing the problem in question, why it is unacceptable and what needs to be done to correct it. The supervisor should forward a copy of the warning on to Human Resources to be retained in the employee's file. The supervisor should discuss the written warning in person with the employee during or following the end of their shift.

### **Disciplinary Action/Notice**

If an employee displays inappropriate conduct or behavior or unsatisfactory work performance following a verbal and/or written warning, a disciplinary meeting can be held with the employee, supervisor and the department manager to discuss the problem. As a result of the meeting, a disciplinary action/notice should be completed noting violation(s) and any disciplinary action(s) taken. A copy of the disciplinary notice should be retained in the employee's file. (Disciplinary action could include suspension without pay or re-assignment to another, lesser position.)

**Termination Of Employment**

Employees whose work performance is unsatisfactory or who engage in misconduct or inappropriate behavior may be discharged from employment. This is especially the case where prior discipline has not corrected the employee's work performance, conduct or behavior. Remember, however, that all employees are "at-will" which means employment can be terminated at any time with or without cause or prior warning.

## 781 HOUSING POLICY

It is the policy of Westward Seafoods, Inc. (WSI) to provide a clean, comfortable, safe and congenial atmosphere for the residents of the facility. Specific policies apply to bunkhouse living. These rules apply to all employees and Guests staying in company-provided housing. Violation of the following bunkhouse policies is grounds for disciplinary action up to and including termination from employment. Failure on the part of an Employee Guest to comply with company policies may result in rescission of the Guest's visitation privileges.

1. Open elements (i.e., hot plates) for cooking food are not allowed in the rooms. Cooking in the rooms is an extreme fire hazard, as well as a sanitation control problem.
2. Food preparation is not permitted in the bathrooms or public space.
3. Non-Registered Guests are not allowed on the premises after 10:00 p.m.
4. **Music & voices must not be heard beyond the confines of your room.**
5. Rooms will be vacuumed weekly by the housekeeping staff. Therefore the floor must not be littered with clothes/gear. A filthy room will be noted and management will be contacted.
6. Fighting and disorderly conduct are strictly prohibited.
7. Tampering with or unauthorized use of public utilities, cable television, phones, fire detection devices, fire fighting equipment or smoke alarms is prohibited. Any cost incurred by the company to repair damages done to utilities will be assessed to the employee and deducted from employee's paycheck as permitted by Alaska law.
8. Portable or electric heaters are not permitted.
9. Pets are not allowed in the bunkhouses.

### Helpful Reminders:

- a. Unalaska is often buffeted by high winds, rain & snow storms. To prevent windows from being damaged, it is suggested that occupants close all windows prior to leaving their unit.
- b. Smoking in bed can be a hazard. Please refrain from doing so.
- c. Lock your doors. WSI will not be responsible for any loss or damage to your personal belongings.
- d. Be a courteous neighbor. Due to the 24 hour work schedule, activities should be carried out in a considerate manner. **Noise should be kept to a minimum and not be heard outside the room.**

## 782 ELECTRONIC COMMUNICATION SYSTEMS POLICY

WSI maintains and utilizes a number of electronic and non-electronic messaging and communication systems, such as voice message, e-mail, fax, telephones, networked personal computers, Internet and worldwide web access in order to facilitate and conduct its business. All messages and documents sent, received, composed and/or stored on the Company's electronic communication systems are the property of WSI.

These systems are to be used to conduct WSI's business. They are not provided for personal use. Personal use of these systems are expected to kept to a minimum. Personal use that interferes with an employee's work performance may result in discipline up to and including termination.

WSI reserves the right to access all electronic communication systems such as voice mail and e-mails at any time. The existence of a password does not mean that messages are private. Please remember that e-mails, voice messages, history of internet use, hard drives or documents saved to WSI's network computers are not confidential from WSI. Additionally, please remember that even when a message, document or other electronic communication has been deleted or erased, it is still possible to retrieve it from a back-up system. Consequently, think before you send an e-mail or otherwise communicate electronically using WSI's systems. If you would be embarrassed if your message were disclosed, do not send it.

Though WSI as the owner of these systems reserves the right to access messages or documents at any time, messages on our electronic communication systems are to be accessed only by the intended recipient or the creator, or by others at the direct request of the intended recipient or creator. Attempts by persons other than the above to access messages or documents on our systems will constitute a serious violation of this policy and may result in discipline including termination.

We expect all WSI employees to use our electronic communications as well as other company property, in a professional and competent manner. Among other things, access to sexually explicit or pornographic materials through our electronic communication systems is expressly prohibited. Similarly, messages on our electronic communication systems are subject to the same policies regarding nondiscrimination and anti-harassment as our other work place communications. Offensive, harassing or discriminatory content in electronic communications will not be tolerated.

WSI obtains licenses for the use of a number of software packages in order to facilitate and conduct our business. We do not own the software or its related documentation, and except as authorized by the license with the software developer, in most instances we do not have the right to reproduce it. Generally, WSI will allow, in strict conformance with the software licensing agreements, exempt employees to load and maintain copies of software packages on their home computers for their use in conducting WSI's business. However, employees may not give copies of our licensed software to other employees, guests, or other persons, except as pre-approved by management and as allowed by the terms of the applicable licensing agreements. No employee or other person may load software (including games, screen savers, etc.) onto a WSI computer unless specifically approved by management. The use of non-business software on WSI's computers is prohibited.

All outside diskettes, thumb drives, etc., must be scanned for viruses by appropriate staff prior to being used on WSI's computer system.



## 783 COMPLAINT PROCEDURE

Employee complaints or issues are a concern for WSI. WSI endeavors to let an employee tell his or her side of the story and give full consideration to the problem or complaint. There will be no reprisal, criticism, or penalty levied toward an employee who brings forth an issue, complaint or concern.

### COMPLAINTS OF DISCRIMINATION

Any employee with concerns or a complaint about any type of discrimination or harassment regarding race, color, religion, gender, sexual orientation, national origin, age, disability, veterans' status or any other characteristic protected by law, are encouraged to bring these issues, **either verbally or in writing**, directly to the attention of Human Resources, either on-site or at headquarters. Such concerns will be investigated by the Director of Human Resources or a designee. *See* Anti-Harassment Policy No. 703 for more information.

### GENERAL ISSUES OR CONCERNS

In general, if you have a complaint or a concern about an on the job issue, you should first approach your immediate supervisor about it. Be sure to talk with your supervisor about the complaint within two (2) consecutive workdays from the onset of the issue. Explain the nature of the problem and suggest possible solutions. Your immediate supervisor probably knows more about you and your job than any member of management, and is in the best position to deal with your complaint properly and quickly.

Keep in mind that the supervisor may give you their reply to your complaint immediately or may postpone an answer to study the situation and/or obtain more information. In any case, the supervisor will respond in person and/or in writing.

If you have not received a satisfactory answer or settlement of the complaint from your immediate supervisor, then you may refer the problem to Human Resources. In order to do this you need to go to the main desk and ask to speak to someone in the Human Resource department. Human Resources will not solve the problem for you, however, they will help assist you in determining who is best suited to respond to your concerns. In all likelihood a meeting may be arranged for you & your department manager to meet and discuss your concerns. Human Resources' personnel will be present to assist all of the involved parties in reaching a mutually agreed upon solution.

WESTWARD SEAFOODS, INC.

**DRUG FREE WORKPLACE PROGRAM ACKNOWLEDGEMENT FORM\***

In order to assure a safe and efficient work environment, WSI has adopted a Drug Free Workplace policy and a Drug/Alcohol Posting policy. I acknowledge receiving copies of these policies as part of the Employee Handbook. While employed at Westward Seafoods, Inc., I agree to comply with this these Drug Screening and Drug Free Workplace policies.

I also agree to submit to drug and alcohol testing as described in the Drug Screening, Drug Free Workplace and Drug Testing Policies.

I hereby give my consent to having any alcohol or drug test results released to Westward Seafoods, Inc. management.

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Date

\_\_\_\_\_  
EMPLOYEE'S NAME (TYPED OR PRINTED)

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**EMPLOYEE ACKNOWLEDGEMENT FORM\***

The employee handbook describes important information about WSI, and I understand that I should consult my Department Manager and or the Human Resources Department regarding any questions not answered in the handbook.

Because the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies.

Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document and that I am employed at will. I have received the handbook, and I understand that it is my responsibility to read and follow the policies contained in this handbook and any revisions made to it.

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Date

\_\_\_\_\_  
EMPLOYEE'S NAME (TYPED OR PRINTED)

\_\_\_\_\_  
\*Please return these signed forms to the Human Resources Department