



Siegwerk Handbook USA

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Introduction to:

Who We Are,
Our Vision,
Our Mission,
Our Values and
Our Guiding Principles

WELCOME!

Joining Siegwark means joining a Company that thinks big but has kept a family feel to the work environment. That means you get the very best of both worlds, a global, market-leading company that gives you all the support and opportunity to collaborate your needs along the way.

Throughout this document the term Siegwerk refers to Siegwerk USA, Inc. (Flex Pack) and Siegwerk EIC, LLC (Narrow Web).

This Handbook is designed to acquaint you with and provide you with general information about working conditions, benefits and policies affecting your employment with Siegwerk Inc. A copy of this handbook is available and in the Forms Library in ADP. In addition, a hard copy is available for viewing in the Human Resources office.

No employee handbook can anticipate every circumstance or question about employment policies and procedures. It contains only general information and guidelines. Accordingly, the Company reserves the right to add, modify, supplement, rescind or revise any provision of this Handbook or the policies, practices, benefits and procedures on which they are based from time to time, with or without advance notice, as it deems necessary or appropriate at its discretion. You will be notified when practicable when an official change in policy has been made. The benefits described herein are provided at the sole discretion of the Company and this Handbook is not and should not be interpreted to be an assurance, promise or guarantee of an obligation to continue to provide such benefits. The Company reserves the right to deviate from the policies and guidelines set forth if appropriate under the circumstances.

Furthermore, this Handbook is not a substitute for the terms of any medical or other benefits plan. Please note that the terms of the written benefits plans are controlling. If at any time, there is a conflict between this Handbook and the terms of such a benefit plan (which you should read carefully), the terms of the benefit plan and not this Handbook will control. Furthermore, should there be a conflict between any of the terms of this Handbook and any state, local, or federal law, the applicable law will supersede the applicable provision of this Handbook to the extent necessary to bring this Handbook into conformity or compliance with the applicable law.

This Handbook supersedes any and all Handbooks and/or manuals prior to the date appearing below. This Handbook also supersedes all prior oral and/or written policies, procedures, rules, regulations, commitments and practices by the Company. Accordingly, please discard any and all copies of previously issued Handbooks or return them to the Human Resource Department. All representations by any employee of the Company that in any respect conflict with any matter set forth in this Handbook are invalid unless, specifically acknowledged in writing and signed by the President of the Company.

IN ADDITION, THIS HANDBOOK IS NOT INTENDED TO AND DOES NOT CONSTITUTE AN EMPLOYMENT CONTRACT AND IS NOT INTENDED TO CREATE CONTRACTUAL OBLIGATIONS OF ANY KIND. NOTHING IN THIS HANDBOOK OR OTHER COMPANY EMPLOYMENT POLICY IS INTENDED TO CREATE ANY PROMISE OR REPRESENTATION OF CONTINUED EMPLOYMENT OR FOR ANY OTHER TERMS OR CONDITIONS OF EMPLOYMENT.

WHO WE ARE

The formula “Ink, Heart & Soul” describes our everyday work. Together with our customers, we develop printing ink solutions – with “heart and soul”. For this reason, “Ink, Heart & Soul” is much more than just a slogan, as our aim is to develop partnerships for our mutual benefit.

More than 5,000 employees work for our company in more than 30 national organizations. They enable us to offer our customers the best possible solution every time. And thanks to our excellent staff, we are already creating the solutions of tomorrow today.

OUR VISION

Siegwerk is the best-performing supplier of printing ink worldwide. We are recognized for our ability to develop the right products for our customers’ unique needs and provide expert advice for optimizing their processes. In the spirit of partnership, we develop the best possible total cost solutions. We attract and develop the best talents in the industry. To preserve the financial health and independence of our privately held business over the long term, we are committed to sustainable profitable growth and efficiency.

OUR MISSION

Our success is founded on our extensive expertise, close partnerships with our customers and professional relationships that are characterized by respect and fairness. This is reflected in our daily work. Wherever we operate, what unites us Company-wide is our passion for printing ink. Our solutions bring packaging and publications to life – and give our customers’ products their unique identity. This makes us proud.

Thanks to our international set-up and strong commitment to excellence, we are able to offer our customers products of consistent quality combined with quick worldwide on-site support. Our expert support helps customers streamline processes and increase efficiency. Our forward-thinking approach lets our customers focus on their core business. This upholds the tradition of our privately owned business going back to the year 1830.

Siegwerk is an independent Company. Our independence allows us to make long-term decisions at our discretion. These benefit our Company, customers, employees, suppliers and shareholders. We provide stability while at the same time permitting freedom of action. This requires a responsible approach to managing human, material, and monetary resources.

We differentiate ourselves from our competitors in that we truly live the values of a professional, privately-owned business. Our customers and employees always come first. This drives every strategic move we make, today and in the future.

In the highly competitive market, profitability is a prerequisite to safeguarding jobs and our Company’s independence over the long term. We are committed to a global culture of performance in which we benchmark ourselves not only against our competitors, but also within our own ranks. This competition enables us to achieve our own high standards. We are governed by a clear set of rules that apply equally to everyone. We are committed to efficient and seamless global teamwork. This makes us a truly great Company.

OUR VALUES

Quality - Do it right, the first time, on time, every time.

We set ourselves high standards in everything we do and see ourselves as a community of achievers with a shared understanding of quality. This allows us to consistently offer the same high level of quality in products, reliable service, and quick on-site support around the world. We are always one step ahead, improving our performance by challenging routine practices and pursuing objectives with determination. We proactively increase efficiency and improve total costs throughout the entire value chain.

Responsibility

We are aware of our responsibility towards customers, employees, suppliers, shareholders, society and the environment. We live up to this responsibility by managing resources wisely, treating others with respect and by considering the consequences of our actions. We responsibly use the freedom of action entrusted to us. This allows us to make autonomous decisions and act in accordance with them.

Open-Mindedness

We think globally and act locally. This is reflected in our relationships with customers and colleagues. We are open to new ideas and view change as an opportunity. When working together, we communicate openly and always share information with those who need it. We constantly improve our performance by learning from our mistakes. We encourage an open exchange of ideas. We support this through constructive teamwork and a culture of dialog across all business units, regions, and functions.

Foresight

Our aim is to remain one step ahead of market expectations. Therefore, we identify potential challenges for our business partners early on. We systematically take action to address these opportunities. We advance the ink industry through our innovative ideas and develop new markets by convincing people with our products and services.

Dedication

We do everything in a disciplined manner. We set guidelines for ourselves and use them as a frame of reference for all of our actions. Our Company interests come before individual interests. We document decisions and results and ensure access to this information. We set ambitious goals and work tirelessly to reach them.

OUR GUIDING PRINCIPLES

As one of the world's leading manufacturers, Siegwerk is committed to the principles of sustainability: achieving a sensible balance between ecological, social and economic needs without compromising the resources of future generations. The principle of sustainability applies to all company aspects of Siegwerk operations:

Customers as Partners, Innovation as Driver

Our business is based on long-term partnerships. We counsel our customers regarding functionality, efficiency and safety and foster innovation and sustainability along the whole value chain.

Employees as the Key to Success

Siegwerk recognizes that our employees are responsible for the success of the organization. We strive to create an environment that attracts and retains top talent. We do this by making safety in the workplace the first priority, fostering personal development and growth, attracting and nurturing talented people from diverse backgrounds and creating an environment that highlights a good and collaborative working atmosphere.

Responsibility for Environment and Society

Siegwerk is committed to our responsibility to the environment and society. This is reflected in the fact that we minimize the impact of our sites on the environment, act in accordance with applicable laws and association requirements – our own standards exceed these, we make efficient use of resources, contribute to the common good and communicate with our stakeholders in a transparent way.

Sustainable Economic Success

To ensure the economic sustainability of Siegwerk, we invest in long-lasting profitable growth by provide tailor-made products and solutions in outstanding quality, build beneficial suppliers relationships and focus on plant safety, efficient processes and continuous improvement.

SIEGWERK QUALITY POLICY

We set ourselves high standards in everything we do and see ourselves as a community of achievers with a shared understanding of quality. This allows us to consistently offer the same high level of quality in products, reliable service and quick on-site support around the world. We are always one step ahead, improving our performance by challenging routine practices and pursuing objectives with determination.

We proactively increase efficiency and improve total costs throughout the entire value chain.

RELATIONSHIP BETWEEN MANAGEMENT & EMPLOYEES

Siegwerk has always successfully operated in a union-free environment and we believe this is the most beneficial atmosphere for our employees, customers, and our business. The growth and success of the people who have become associated with our company are a result of the honest, open, direct and rewarding relationship which exists among and between the company management and employees. We uphold an Open-Door policy where employees and management can honestly discuss concerns and resolve issues promptly and fairly.

We are committed to providing all of our employees with pay and benefits that are competitive for our type of business within the communities in which we operate. We believe that our employees do not need a third party to speak on their behalf. People have the right to engage in union activity, but they also have the right under federal law to refuse to join or assist any union, or to authorize anyone else to speak on their behalf.

EQUAL EMPLOYMENT OPPORTUNITY

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at Siegwerk, where employment opportunities are based upon personal capabilities and qualifications without race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age, disability or genetic information or any other protected characteristic as established by federal, state, and local laws. Siegwerk complies with applicable federal, state and local laws governing nondiscrimination in employment in every location in which the Company has facilities. This policy applies to all policies and procedures relating to recruitment and hiring, placement, promotion, transfer, compensation, benefits, layoff, termination and all other terms and conditions of employment.

BENEFITS

BENEFITS

Medical

Dental

Vision

Life Insurance

Disability

Paid Time Off

Bereavement

Jury Duty

401k

Profit Sharing

Bonuses

Critical Illness &
Accident

Holidays

Employee &
Family Assistance

Tuition Assistance

BENEFITS

The group benefits at Siegwerk are designed to provide employees with comprehensive, flexible, health care services, while protecting employees and their families from financial hardship in the event of a serious medical event. All employees working over 20 hours per week are eligible to enroll in the benefits offered at Siegwerk. All insurance plans become effective on the first of the month following date of hire.

Some of these benefits are paid in full by Siegwerk, whereas with others employees pay either a portion or all of the costs. You are free to choose or waive out of those plans that require you to pay a portion of the cost; however, you must elect benefits this within 30 days of hire. If you do not elect your benefits within 30 days of hire, you will need to wait until the next annual open enrollment period. Once benefits are elected and coverage begins, elections (or waivers of coverage) will remain in place for the remainder of the year absent a family status change or life event.

BENEFIT SUMMARY

The benefit plans include the following:

- Health Insurance
- Dental Insurance
- Vision Insurance
- Short-Term Disability
- Long-Term Disability
- Group Life Insurance
- Accidental Death & Dismemberment Insurance
- Supplemental Life Insurance
- Critical Accident
- Critical Illness
- Worker's Compensation Insurance
- COBRA
- Holidays
- PTO
- Profit Sharing
- Employee and Family Assistance Program

Note: Detailed information on each of the plans listed above can be found in the annual Benefits By Design book which can found in the Forms Library within ADP.

Reminder

Certain family status changes, or life events, may allow you to enroll in the plan, or add/drop dependents to an existing election, other than when first hired or during open enrollment. These family status changes, or life events, allow you to make some changes within 30 days of the event. All adjustments must be related to the event and proof of the event must be provided to HR. Qualified family status changes or life events include:

- Marriage or Divorce
- Birth or Adoption of a Child
- Death of a Spouse or Child
- Loss of a Dependent or gain of a Dependent
- Former Dependent again meets the plan definition of Dependent
- A change in Spouse's eligibility through their employer
- Loss of Other Coverage
- Eligibility for Medicare
- A change from Full-Time to Part-Time Status or vice versa by you or your spouse

Note: It is your responsibility to notify Human Resources within the appropriate deadlines. Failure to submit the change in a timely manner may require you to wait for the next open enrollment.

Profit Sharing Plan

The purpose of the Siegwerk Employee Profit Sharing Plan (EPSP) is to share a portion of the company's profitability with the employees, align business results with employee pay and strengthen commitment to results throughout the organization. To be eligible, you must not be covered under any group bonus plan, sales incentive plan or any other bonus, commission or incentive and be actively employed at the time of payout and through the end of the year (December 31st) for which the payment is earned. "Actively" employed includes all employees on paid personal time, bereavement, jury duty, FMLA, worker's compensation, HR-approved, or military leave. The EPSP will be prorated in your first year of employment. Please see HR for further information.

Group Bonus Plan

Some employees may be eligible to participate in the Siegwerk Group Bonus Plan. To be eligible, you must not be covered under any sales incentive plan or any other bonus, commission or incentive and be actively employed at the time of payout and through the end of the year (December 31st) for which the payment is earned. "Actively" employed includes all employees on paid personal time, bereavement, jury duty, FMLA, worker's compensation, HR-approved, or military leave. Please see HR for further information.

Siegwerk retains the right to modify, supersede, interpret or cancel in whole or in part any of the published or unpublished provisions of this plan without notice.

Educational Assistance Program

The Educational Assistance Program is designed for employees who have interest in self-development by participation in pre-approved educational courses outside regular business hours. In order to be eligible to apply to this program, employees must be regularly scheduled for at least 20 hours per week and be employed for 1 year or more as a Siegwerk employee. Siegwerk will reimburse 100% for the first \$2,255 and 75% up to \$11,275 for the cost of tuition, books, lab fees etc. for approved courses, after they are successfully completed (final grade of "C" or better). This program provides benefits up to the IRS limit each calendar year.

A request for approval of a course must be completed prior to taking the course and requests for reimbursement must be submitted within 60 days of the completion of the class in order for expenses to be reimbursed.

If you resign or are terminated before receiving a grade, you will not be reimbursed for tuition expenses. If your total program costs more than \$2,255, you must be employed with Siegwerk for 2 years after the completion date of your program. If you resign or are terminated prior to the end of the 2-year commitment period, you must pay back the full amount paid by Siegwerk. The full amount will be reduced by 1/24th for every month you stay with Siegwerk after the completion of the program.

Employee & Family Assistance Program

Employee Assistance Program...whatever the problem, there is a solution...Siegwerk offers you and your immediate family the opportunity for short-term counseling and referral services, at no cost. The program is designed to deal with a wide range of issues – from the small to the large – dealing with marital or financial matters, alcoholism or drug use. The services you receive are completely confidential. No one receives any information about your visit without your permission. When calling for an appointment, you'll need to identify that you are a Siegwerk employee. Below is their contact information.

Call: 800-311-4327

TDD: 800-697-0353

Online: guidanceresources.com

App: Guidance Resources Now

Web ID: GEN311

Flexible Scheduling

Flexible Scheduling (FS) is a way to restructure traditional work schedules so that employees can occasionally work in a non-office location creating greater work-life balance.

The maximum amount of FS for any eligible employee is 20% of their weekly paid hours or eight 8 hours based on a 40-hour workweek. However, each department's manager may choose to set the maximum at some other amount (i.e., 10% etc.) depending on business needs; or they may choose not to offer a flextime schedule for their employees.

Any FS arrangement can be revoked if an employee is found to be not performing their work, unreachable, unresponsive, etc. Abuse of this policy will not be tolerated. For additional details, please contact Human Resources.

Holidays

You are eligible to receive holiday benefits as of your first day of employment. Holiday pay will only be paid out if you are present for your entire regularly scheduled shift prior to and following the holiday unless properly requested off (at least 24 hours advance in ADP) and approved by your supervisor in advance, this includes holidays that span on or around a weekend. Holidays may be observed on the day prior to or following the actual holiday date. For example, if a holiday date falls on Saturday, it may be observed on Friday or a holiday date that falls on Sunday, may be observed on Monday. Please confirm with your manager when holiday observances occur so that you may plan accordingly.

Our designated holidays are as follows:

- New Year's Day (January 1)
- Good Friday (Friday before Easter)
- Memorial Day (last Monday in May)

- Independence Day (July 4)
- Labor Day (first Monday in September)
- Thanksgiving Day & Friday after (fourth Thursday & Friday in November)
- Christmas Eve Day or the day following Christmas
- Christmas Day (December 25)

Exempt employees will receive one day's earnings.

Employees paid on an hourly basis will be paid their straight time pay rate times the number of hours normally scheduled on the day of the holiday.

Full time employees paid on an hourly basis not scheduled to work on the designated holiday will receive 8 holiday hours at straight time. (Part time employees will receive a pro-rated amount).

Employees paid on an hourly basis who work on a designated holiday will receive three (3) times their straight rate for hours worked; no additional overtime will be paid for such hours. No other holiday pay will be included.

For InHouse employees, if the customer's facility shuts down and it is not a Siegwerk recognized holiday employees will be required to use their personal time or take it as time without pay.

If employees are able to work in some capacity during any type of customer "shut down," as determined by their supervisors, they may be expected to do so, or they may be permitted to take available personal time.

Paid Time Off (PTO)

NOTE: California Employees, please review, sign and return the PTO Addendum provided to you in your new hire packet for State specific requirements regarding PTO. Siegwerk will adhere to any local or state leave or sick time laws that fall outside the scope of this policy.

We recognize that there are a variety of situations for which you would like time off. So to make it simple, you will receive paid "personal time" which allows you to take time off with pay if you are sick, or for vacation, or simply because you'd like a day off. Your PTO must be requested at least 24 hours in advance within the ADP Portal. Even if PTO is properly requested 24 hours in advance, supervisors have the discretion to deny PTO based on business needs. Any absence not properly requested 24 hours in advance and approved (outside of HR-approved or protected leave) is subject to disciplinary action, the details of which are contained in the Attendance Policy. Your PTO account will be deducted as you take time off. You may not always want to request a full day of time off, and as such, paid personal time can be taken in one-hour increments. PTO will not be counted towards hours worked in the work week for the purposes of overtime.

You must exhaust your PTO balance prior to taking unpaid time off. Supervisors have the discretion to approve or deny requests for unpaid time off once your PTO balance has been exhausted. The Company also reserves the right to send employees home who are ill; utilization of PTO, if available, will be required in this circumstance as PTO encompasses sick, personal and vacation time.

Any leave request for more than two consecutive weeks requires second level signoff/approval.

How much paid time off do I receive?

- The rate for new hires will be 3.08 hours per pay period which is the equivalent of 80 hours.
- On your one year anniversary date, you will begin earning at the rate of 4.62 hours per pay period, which is the equivalent of 120 hours.
- On your five-year anniversary date, you will begin earning at the rate of 6.15 hours per pay period, which is a full annual equivalent of 160 hours.
- On your ten-year anniversary date, you will begin earning at the rate of 6.92 hours per pay period, which is a full annual equivalent of 180 hours.
- On your fifteen-year anniversary date, you will begin earning at the rate of 7.7 hours per pay period, which is a full annual equivalent of 200 hours.

Eligible part time employees (those regularly scheduled for 20 hours per week or more) will receive a prorated amount of personal time, based on the averaged number of hours worked per pay period.

Does personal time ever stop accruing?

Personal time accrual will stop for any leave of absence (or contiguous leaves of absence) of over 12 weeks. It will resume once the employee has actively returned to work.

How do I keep track of the personal time that is available to me?

Employees are able to view PTO balances and make PTO requests in ADP. ADP tracks the amount of PTO earned, taken, and remaining. Please ensure that you confirm available PTO time prior to taking it. Please also ensure that your request is approved prior to actually taking the time off. All PTO time taken must be recorded in ADP.

When can I take personal time?

During your first year of employment, personal time may only be taken as earned. As of your one-year anniversary date you may borrow from the remaining amount of personal time you will earn for that year. Each January 1st after your one-year anniversary date, you are able to borrow the total amount to be earned for the year; this, of course, is subject to the staffing needs of the department and the approval of the supervisor. For example, if you earn three weeks per year, schedule permitting, you may take all three weeks in January if approved by your supervisor.

What happens if I do not take all my personal time?

Although we encourage you to take your personal time, you may choose to carry over up to 40 hours of personal time per year. It's important that you utilize all of your allotted personal time because, except in special circumstances, you will not be permitted to carry over more than 40 hours. It helps to plan when you will use your personal time as it may not be feasible to take all of your time at the end of the year.

What happens if I take all of my personal time and I need to take time off?

Staffing levels are determined based on number of FTE's (Full time equivalent positions) which take into consideration the expected amount of time off for holidays and PTO. Consequently, if you take time off beyond this, it could jeopardize your department's ability to provide coverage. Unless otherwise approved as FMLA leave or an approved leave of absence, taking additional time off beyond the provisions of the benefits could be viewed as a performance issue.

What happens to my personal time if my employment ends?

If you voluntarily end your employment with Siegwerk and provide a two week notice you will be paid for earned, yet unused personal time. Any request for paid time off after you have given

notice will not be approved. However if you are terminated for willful misconduct, negligence, abandon your job, or fail to provide sufficient notice of your termination, you will not receive earned yet unused personal time. Upon your termination date, if you have used/borrowed more personal time than you have earned, you will be required to repay the difference. This amount will be deducted from your final paycheck(s), unless other arrangements are made. PTO time requests/usage will not be allowed during the period of notice of resignation.

Leaves of Absence

Leave type	Description
State Law Leave	Siegwerk will comply with state laws regarding leaves of absence when required by state law including emergency response, disability, pregnancy, medical, crime victim and other leaves provided by state and local law where applicable.
FMLA Leave	For your own serious health condition, to care for a family member with a serious health condition, to bond with a newborn, adopted, or foster child, to attend to matters when a qualifying family member is called to active military service.
Maternity Leave	For mothers following the birth of their child.
Workers' Compensation	For your own work-related injury or illness.
Military Duty	For your own enlistment or call to military active duty or active duty training.
Jury Duty	When summoned or subpoenaed to serve on a jury or act as a required court witness. Does not apply when employee is a party to the case.
Bereavement	Following the death of an immediate family member as defined in the policy.
Personal Leave of Absence	Unprotected (not legally protected) absence for personal reasons

Family Medical Leave

The Company complies with the Family and Medical Leave Act (FMLA) and where applicable, state family and medical leave laws. This policy is a summary of the FMLA. If you have any questions about FMLA, whether you are eligible for leave under FMLA or how to apply for FMLA please contact the HR Department.

Who is eligible?

To be eligible for leave under the FMLA, you must have worked for the Company for at least one year and for at least 1,250 hours during the twelve (12) months preceding your requested leave. You also must work at a worksite with fifty (50) or more employees, or at a worksite where there are fifty (50) or more employees working for the Company within a seventy-five (75) mile radius. Employees who do not meet these requirements are not eligible for FMLA leave.

How much leave is provided?

Employees can take a maximum of twelve (12) weeks of leave within a rolling twelve (12) month period. FMLA leave is unpaid leave unless an employee has available paid leave (i.e. PTO, short-term disability benefits, etc.). An employee using FMLA leave must use all of his or her available paid leave concurrently with FMLA leave. The remainder of the FMLA leave will be unpaid. For example, if an employee has two weeks of PTO at the start of a twelve (12) week FMLA leave, the first two weeks of FMLA leave will be paid and the remaining ten (10) weeks will be unpaid.

FMLA leave is calculated using the “rolling” twelve (12) month period. This means the Company will look back at how much FMLA time the employee has used during the preceding twelve (12) months to determine an employee’s remaining FMLA eligibility. For example, if an employee takes two weeks of leave on January 1st and then requests additional leave on March 1st, the employee would have ten (10) weeks available. If the employee used all ten weeks, he or she would not have any additional leave available until January 1st of the following year, at which point the employee would begin to accumulate two weeks of leave (regaining one day of leave for each day of the two week period).

Employees taking leave for the care of a covered service member may be eligible for 26 weeks of unpaid FMLA leave in a single twelve (12) month period.

What types of absences are covered by the FMLA?

Under the FMLA, employees may take protected leave under the following circumstances:

- The birth of the employee’s child, and to bond with the newborn child;
- Placement of a child with the employee for adoption or foster care to bond with the child (including related court appearances, consultations with attorneys and counseling sessions);
- To care for a spouse, child or parent who has a serious health condition as certified by the family member’s health care provider;
- For the employee’s own serious health condition as certified by the employee’s health care provider;
- Because of any qualifying event arising out of the fact that the spouse, a child or parent is a regular component of the Armed Forces, or an Armed Forces retiree, who is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces, including the National Guard or Reserves; or
- To care for a covered servicemember with a serious injury that was incurred in the line of duty while on active duty, including the National Guard or Reserves. This includes covered veterans who are undergoing medical treatment, recuperation or therapy for serious injury or illness and were discharged within the five-year period before the eligible employee first takes FMLA military caregiver leave for him or her.
- Leave for the birth or placement of a child for adoption or foster care will expire twelve months from the date of birth or placement. Spouses who are both employed by the Company are limited to a combined total of 12 work weeks for leave for the birth and care of a newborn child, placement of a child for adoption or foster care or to care for a parent with a serious health condition.

Can I take intermittent leave or a reduced schedule?

An employee can take leave intermittently or on a reduced leave schedule in certain situations. If the leave is for the birth or placement of a child for adoption or foster care, the Company must agree to the intermittent leave or reduced schedule. If the leave is for the “serious health condition” of the employee or the employee’s spouse, child or parent, leave may be taken

intermittently or on a reduced schedule only when medically necessary. Where leave is taken for a serious health condition, the employee must work with the Company to minimize business disruption.

Intermittent leave can be taken in smaller increments, which will be determined based on our timekeeping system. The increments will be counted toward the twelve (12) week allotment. The twelve (12) week allotment is equivalent of 480 hours of leave.

In certain circumstances, the Company may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule, or in instances when leave for the employee or employee's family member is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth, or placement for adoption or foster care.

What notice is required for FMLA leave?

Employees should request leave thirty (30) days before the leave is scheduled to begin when the need for leave is foreseeable. Where thirty (30) days notice is not possible, employees should notify the employer as soon as the employee learns he or she will require FMLA leave. Failure to provide timely notice of the need for leave may result in delayed approval of the leave request.

What Certification Will be Required?

A leave request based on the serious health condition of the employee or the employee's spouse, child or parent must also be accompanied by a "Certification of Health Care Provider" completed by the applicable health care provider. The Certification must state the date on which the health condition commenced, the probable duration of the condition and the appropriate medical facts regarding the condition. If the employee has a serious health condition, the Certification must state which functions of the position the employee cannot perform. If the employee is needed to care for a spouse, child or parent, the Certification must state this fact along with an estimate of the amount of time the employee will be needed.

How do I Apply for Leave?

An employee requesting leave must complete a leave request and, where applicable, a Medical Certification Statement and return it to the HR Department. The request must state the reason for the leave, the duration for the leave and the starting and end dates of your leave.

What Happens to Benefits During and After Leave?

The Company will continue employee's health benefits on the same level and with the same conditions as if the employee had continued to work. This means the employee will be required to contribute his or her portion of any premiums to the company while on leave. The company will continue to make its contribution toward those premiums.

If the employee chooses not to return to work for reasons other than a serious health condition or a circumstance beyond the employee's control the company may require the employee reimburse the company for the amount it paid for employee's health insurance premium during this period.

An employee who takes leave under this policy may be asked to provide a fitness for duty (FFD) clearance from the health care provider. This requirement will be included in the Company's response to the FMLA request. Generally, an employee who takes FMLA leave will be able to return to the same position or a position with equivalent status, pay, benefits and other

employment terms. The position will be the same or one which is virtually identical in terms of pay, benefits and working conditions. The Company may choose to exempt certain key employees from this requirement and not return them to the same or similar position. In this situation, the employee will be advised of this fact in the Company's response to the FMLA request.

Maternity Leave

Maternity Leave is a leave of absences offered to expecting mothers who need continuous paid time away from work to bond with a new born child and adjust to their new family situation. Subject to the eligibility requirements, you may use Maternity Leave to take paid time away from work for the birth of a child.

The length of a Maternity Leave is as follows:

- Up to 8 weeks (paid) time off for the mother of the child.

In cases of pregnancy, Siegwerk will follow all State, Local and Federal laws pertaining to pregnancy in the workplace. Siegwerk encourages all pregnant persons to notify HR of their pregnancy and consult with their physician or obstetrician regarding chemicals they may come into contact with or may be exposed to while working at Siegwerk.

Workers' Compensation

Workers' Compensation is a statutory benefit that is available to all Siegwerk employees who sustain a work-related illness or injury. Eligibility for coverage starts on the first day of employment. If you sustain a work-related injury or illness, Workers' Compensation covers the medical expenses related to the illness or injury sustained in the course of employment and provides compensation to help replace lost income until you are able to return to work.

When claims are approved, medical, surgical and hospital treatment costs are paid directly to the hospital or clinic by the Workers' Compensation insurance carrier. The Workers' Compensation carrier also pays salary benefits directly to the employee. Salary benefits are generally calculated based on a percentage of the injured employee's gross wages and normally scheduled hours. Note: in cases of restrictive duty as a result of workplace injury or illness, Lead Pay, Shift Premiums etc. will not be calculated for Worker's Compensation salary benefits unless the injured worker is able to perform their role on their regular shift and/or in a lead capacity. All states limit benefits to a maximum weekly amount, which varies considerably from state to state, but by far, the most common percentage is 66 2/3%, but this does vary from state to state.

All states impose a waiting period after the injury before disability benefits are payable. If the duration of the worker's disability exceeds a certain length of time, then benefits will be available retroactively from the date of the injury. For example, in Iowa, an injured worker must wait three days to obtain benefits. However, if the disability extends beyond 14 days, compensation will be available from the date of the injury. This waiting period varies from state to state.

Employees must notify their supervisors immediately after they sustain a work-related injury or illness, whether or not it results in missing time from work. Reports are necessary to comply with laws and initiate workers' compensation benefits. Failure to report an incidence may result in disciplinary action. Failure to notify your supervisor may also result in a loss of benefits. Until you receive formal notification from the insurance carrier that your Workers' Compensation claim is

approved, you must properly report your absence to your supervisor every day. If your claim for Workers' Compensation is approved, you must provide ongoing medical documentation to the insurance carrier and Siegwerk as requested. Before returning to work from an accidental injury, you must provide a physician's statement that you may safely return to work. If you are released with restrictions, HSE and HR will notify your supervisor and assist in determining whether Siegwerk is able to accommodate your restrictions without undue business hardship and/or a direct threat to safety of you or others in the workplace.

If you qualify for FMLA, your FMLA job reinstatement period will apply to your Workers' Compensation leave, where permitted. Certain states provide additional job reinstatement protection for Workers' Compensation leaves. If you need to be on leave beyond the FMLA job reinstatement period, Siegwerk will evaluate your situation based on applicable state and federal laws that apply to leaves, your department's business needs, and the length of the anticipated extension.

If applicable group coverage (medical/dental/life etc.) may continue through a worker's compensation claim. Siegwerk will evaluate coverage continuation on a case-by-case basis. Payment of the applicable employee's portion of the premiums would be the employee's responsibility to pay via a monthly check if approved. Please contact HR to make arrangements for premium payments. Failure to establish arrangements for premium payments could result in the loss of coverage.

Military Duty

Associates will be granted a leave of absence without pay for duty in the Armed Forces as prescribed under federal and state laws. This includes when an associate is active in the Reserves or National Guard and called for active duty and when an associate enlists or is called to active duty. Siegwerk requires that you provide your military orders or other documentation supporting your need for Military Leave. Contact Human Resources as soon as you receive active military orders. If required documentation is not provided, your Military Leave and any benefits associated with it may be denied or withdrawn. In addition, you may be subject to corrective action, which may include the termination of your employment.

The option of continuing Medical/Dental Insurance will be available depending on the length of active duty in accordance with federal and state law. If employees elect to continue employer-sponsored coverage, arrangements should be made with HR via a monthly check. If the employee decides to drop group coverage, if elected, he/she will be reinstated upon return to work, without a waiting period.

Life and Long or Short Term Disability. This coverage will discontinue upon active duty status, since military duty is an excluded coverage. The employee would be reinstated upon return to active employment.

Jury Duty

Siegwerk encourages you to fulfill your civic responsibilities by serving jury duty when required. Notify your supervisor and provide copies of the subpoena or jury summons to payroll upon receipt of notification from the state or federal courts of an obligation to serve on a jury or to act as a court witness. If your absence would create serious operational difficulties, we may issue a request to the court to allow you to choose a more convenient time to serve.

Employees appearing in their own case as a plaintiff or defendant or for a nonsubpoenaed court appearance will not receive jury duty pay. Paid time off or unpaid time off should be requested in those circumstances.

Jury duty pay will be calculated on your base pay rate times the number of hours normally scheduled. We provide paid jury duty for up to four (4) weeks per calendar year. Siegwerk will comply with applicable state laws in states that require additional jury duty pay. If you are requested to serve beyond that period, you may use any available paid personal time or you may request an unpaid, jury duty, leave of absence.

Submit your jury summons to payroll in order to receive jury duty pay.

Bereavement Leave

We recognize that bereavement is a difficult life event, requiring time to grieve and fulfill family obligations. It is the policy of Siegwerk to provide eligible employees with up to three (3) days paid bereavement leave following the death of an immediate family member. For purposes of this policy, we define immediate family member as: parent (including step or in-law), sibling (including step or in-law), spouse or domestic partner, children and grandchildren (including step), an adult who stood “in loco parentis” during an employee’s childhood, and grandparents (including step or in-law). One day of bereavement leave is available to employees due to the death of an extended family member. For purposes of this policy, extended family includes first cousins, aunts and uncles. Any exceptions to the policy must be approved by human resources **prior** to leave being taken.

If you wish to take time off due to bereavement, please discuss the amount of time needed with your supervisor. The basis for the decision regarding how much time is needed might include your relationship to the deceased, travel distance, and involvement in the funeral arrangements. If you need additional time off beyond what is approved as bereavement leave, you may request to use your paid personal time or you may request an unpaid leave of absence. Generally, bereavement leave is taken immediately following the death, however, there may be circumstances when a supervisor will recognize the need for flexibility such as when a memorial service is scheduled at a time in the future. In some circumstances, such as when there are attendance issues, the Company may require documentation regarding the request for bereavement leave.

Personal Leave of Absence

If you have exhausted your PTO, a leave of absence without pay for personal reasons may be requested through your supervisor, who will forward it to the HR Department for approval.

Your request will be considered based on the following factors:

- Purpose of requested leave
- Length of time you will be away
- The effect the leave will have on your department
- Your position and length of service, performance and attendance

If approved, payment of the applicable employee’s portion of medical/dental insurance premiums would be the employee’s responsibility if the leave exceeds two weeks. Life and disability insurance coverage will be extended for up to three (3) months at no cost to the employee.

IMPORTANT - Benefits While on Leave of Absence

If applicable insurance (medical/dental/life etc.) is to continue through an approved “leave,” payment of the applicable employee’s portion of the premiums would be the employee’s responsibility to pay. Please contact HR to make arrangements for premium payments. Failure to establish arrangements for premium payments could result in the loss of coverage.

If no paycheck is drawn because of the leave, 401(k) contributions would cease. Upon return to work, the employee has the opportunity to “catch up” on contributions by increasing their deduction percentage up to the IRS allowable maximum.

Personal Time Off (PTO) will continue to accrue during continuous leaves of absences that are no longer than 12 weeks in duration.

GENERAL POLICIES

The success and reputation of Siegwerk will be determined, in no small part, on the standard of personal and professional integrity with which its employees, officers, and directors conduct themselves. In pursuit of Siegwerk's goals, each employee, officer and director are expected to conduct themselves on the basis of moral and ethical principles reflecting the highest standards of business and individual behavior.

GENERAL POLICIES

General Rules and Regulations for Conduct

Management requests the cooperation of its employees in its efforts to make every employee familiar with all general rules and regulations of conduct for the purpose of promoting effective performance and in preventing accidents.

In the interests of this common cause, Management has obligated itself to enforce, strictly and fairly, the rules listed below, applying disciplinary measures where necessary to ensure compliance.

The following items are illustrative of the kinds of offenses which may be cause for discipline, including suspension or discharge, but are not a complete listing of all such offenses:

- Conduct which discredits the Corporation's good name or any of its products or services.
- Threatening, fighting or attempting bodily injury to another employee.
- Failure to observe safe working procedures or Safety Rules.
- Harboring disease or a disability, which may endanger co-workers.
- Striking lights (including fireworks or tools which create spark or static electricity) in or near any Siegwerk or customer facility.
- Smoking or vaping in prohibited areas on Siegwerk and customer property is not allowed and may result in disciplinary action up to and including termination of employment.
- Failure to meet quality and production standards established for your job.
- Willful hindering or limiting of production.
- Falsifying or refusing to give testimony when accidents are being investigated; or falsifying or assisting in falsification of personnel records and other Company records, or giving false information in making application for employment.
- Failure to promptly report any damage or errors to supervision, regardless of who caused the damage or error.
- Punching/signing another employee's clock card or time sheet or having one's clock card or time sheet punched/signed by another employee.
- Neglect or carelessness in the performance of the duties assigned or in the care or use of Company property.
- Stealing or malicious conduct, including destroying, taking, damaging or hiding any property of other employees or of the company or of the unauthorized removal from the premises of any scrap material or equipment.
- No photographic equipment or visual or sound devices of any nature shall be brought onto the company or customer premises without prior authorization of Management.
- No employee shall photograph or record any equipment, material, product, process, procedure or production information without prior authorization of Management.
- Obtaining material at storerooms or other assigned places on fraudulent orders or misrepresentation.
- Leaving employee's working place or visiting around the plant from his or her usual or assigned place of duty at any time, either during or outside of his regular working hours, without permission of his or her supervisor.
- Carrying concealed weapons or possession of weapons on Company property.
- Vending, soliciting, or collecting contributions for any purpose at any time on Company property is forbidden unless authorized by Management.

- Distributing written or printed matter of any description at any time on Company property unless authorized by Management.
- Posting or removal of any matter on Company bulletin boards or Company property at any time is prohibited unless specifically authorized by Management.
- Gambling while on Company property.
- Purchasing the favor of any person in any form whatsoever, including offering, lending or receiving money or other valuable consideration in exchange for a job, better working place, or any advantage in working conditions.
- Insubordination (such as refusal or failure to perform work assigned or to comply with instructions from supervision) or use of profane, abusive or threatening language or acts toward subordinates, fellow employees, supervisory personnel or officials of the Company.
- Entering unauthorized areas without permission of his or her supervisor.
- Loafing, sleeping, etc., during working time.
- Company telephones shall not be used for personal calls without permission from the employee's supervisor.
- No cellular/mobile phones or other personal electronic items are permitted in Siegwerk production areas. This includes the warehouse and areas designated as prohibited by our customers.

Every Siegwerk employee is responsible for keeping his/her office, laboratory and/or plant area clean. Any ink spilt must be cleaned up as soon as the incident occurs.

Confidentiality

During your employment with Siegwerk, you will likely be provided with information that is confidential and may not be disclosed to anyone outside of the Company, except as required in connection with your job. "Confidential Information" includes know-how, trade secrets, customer lists, designs, data, drawings, samples, processes or products and other information which is not generally known in the businesses in which the Company is engaged. This information must remain confidential during your employment and after your employment ends. To help you understand what information is considered confidential and the importance of maintaining confidentiality, you will be asked to sign a confidentiality policy. Please understand that the Company takes these issues very seriously. Violations of the confidentiality policy may lead to disciplinary action up to and including termination.

Drug-Free Workplace

Providing a safe working environment is a major corporate commitment. Siegwerk strives to maintain a "drug-free workplace." All employees are required to perform their job duties unimpaired by illegal drugs, alcohol, or the improper use of legal substances. For purposes of this policy, the term "illegal" refers to any substance that is illegal under federal law, regardless if it is legal in a particular state.

Employees who abuse drugs or alcohol at work, or appear at work under the influence of illegal drugs or alcohol, harm both themselves and the work environment. As a result, we prohibit the following:

- Appearing at work under the influence of alcohol or illegal drugs;
- Conducting company business while under the influence of alcohol or illegal drugs (whether or not the employee is actually on company property at the time);
- Using alcohol or illegal drugs on the worksite;

- Using alcohol or illegal drugs while conducting company business (whether or not the employee is actually on company property at the time);
- Soliciting, possessing, buying, selling or distributing alcohol or illegal drugs on the worksite; and
- Soliciting, possessing, buying, selling or distributing alcohol or illegal drugs while conducting company business (whether or not the employee is actually on company property at the time).
- Tampering with, adulterating, altering, diluting, substituting or otherwise obstructing any drug testing process required under this policy.
- Refusing to cooperate with the terms and conditions of this Policy. Failure to cooperate includes, but is not limited to:
 - Refusal to be tested,
 - Failure to provide an adequate sample without a valid medical excuse,
 - Refusal to sign required paperwork (including but not limited to, consent forms, acknowledgement forms and chain of custody forms),
 - Failure to show up at an assigned collection site to provide a specimen when scheduled, and
 - Failure to be reasonably available to be tested once the employee has been notified.
 - Note: If the initial test is deemed unable to be evaluated, the individual will be required to provide a second specimen on the same date. Individuals must stay within the clinic during this time. If these rules are not followed and/or the second test comes back unable to be evaluated, the result will be a failed test and employment may be terminate for existing employees or the offer of employment will be rescinded to candidate for an open position with the company.

Any employee who is unfit to work because of reasonably suspected alcohol or drug use may be sent home and is subject to corrective action, including immediate termination of employment. The solicitation, sale, purchase, distribution, possession or use of any non-prescribed controlled substance is a violation of this policy and is cause for immediate termination of employment. In addition, illegal substances found on company premises will be turned over to the proper outside legal authorities for further investigation.

Alcohol at Company-Sponsored Events

Drinking alcohol on Company premises or at Company-sponsored events is allowed only at select Siegwerk-sponsored events where alcohol is served, that are approved by the BU President. All employees are responsible for complying with our policies on professional behavior, harassment, and violence-free workplace, even if consuming alcohol at a Company-sponsored event or conducting business with customers where alcohol use is sanctioned. Every employee is also responsible for using a safe means of transportation if they have consumed alcohol in any of these circumstances.

Drug Testing

As part of Siegwerk’s efforts to provide a safe workplace, Siegwerk will conduct drug testing in accordance with the drug testing policies applicable to the state in which an employee primarily works. Employees will be provided a separate drug testing policy that explains the specifics of when drug testing will be conducted in their state and under what circumstances.

Substance Abuse Prevention

If you would like to speak to someone regarding substance abuse prevention, you can contact our Employee Assistance Program by calling the below number or going to their website.

Phone: 800-311-4327

TDD: 800-697-0353

Online: guidanceresources.com

App: GuidanceResources Now

Web ID: GEN311

Workplace Non-Violence

Siegwerk is committed to providing a safe and secure environment. Weapons of any kind are strictly prohibited in the workplace or on company property. Under no circumstances will we tolerate physical violence or threatening behavior in the workplace, on company premises, at work-related functions, during travel for business, or working at another location. Threatening behavior directed from home is also not tolerated. Workplace violence is defined as any act against an employee or person involved in Siegwerk's operations (from another person, not necessarily employed by Siegwerk) that creates a hostile work environment and negatively affects another employee or individual, either physically or psychologically. Such acts are specifically prohibited by this policy, and include but are not limited to:

- Making threatening remarks or using language as a means to intimidate or bully others
- Directing verbal abuse including offensive, profane and vulgar language at another.
- Causing physical injury or emotional distress to another person, e.g., pushing, hitting, bullying, etc.
- Intentionally damaging Siegwerk property or the property of another employee.
- Acts motivated by, or related to, unlawful harassment, or domestic violence.

Firearms and Weapons

Possessing firearms and weapons on company premises or at a company-sponsored event is strictly prohibited. No employee may bring a weapon to the workplace. For purposes of this policy, a "weapon" means any item designed or intended to be used for the purpose of inflicting bodily injury, which may include items that are legal to own, carry or conceal. You are not permitted to have these items at work or while you are conducting business on behalf of Siegwerk.

Reporting Potential or Actual Violence

You're asked to support this commitment by immediately notifying your supervisor or the HR Department of any potential threat to you or others in the workplace. If there is an immediate physical threat of violence to an employee, the supervisor, or the HR Dept. may respond to the notification by calling the proper authorities or suggesting that the employee leave the premises immediately (for his/her own safety).

Investigative Process

Any report of potential or actual workplace violence will be investigated promptly by the HR Dept. The investigation may include individual interviews with the parties involved, and, when necessary, with individuals who may have observed the alleged conduct. Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Workplace violence will be dealt with appropriately according to the level of threat or violent behavior. Violating the policy against violence or weapons is grounds for corrective action, which may include immediate termination of employment. Additionally, any altercation that rises to the level of criminal conduct will be reported to the proper authorities.

Personal Situations

Sometimes employees may experience personal situations that could adversely affect the workplace. Please tell your supervisor and/or Human Resources if you are in – or know of – any of the following situations:

- Incidents of domestic abuse, violence, or threats against an employee, where there is a possibility that the other party will seek out the employee while they are at work.
- An employee has obtained a restraining order, naming their workplace as a restricted area.
- An employee is receiving threatening or harassing telephone calls, emails, voicemails, or other messages while at work.
- An employee is the target of unwanted pursuit by someone who has been seen at or near the workplace.

Resources

If you are experiencing domestic violence or family problems and need outside assistance, you and/or your immediate family members can get confidential, professional help through Siegwerk's Employee Assistance Program, 24 hours a day, 7 days a week by calling 800-311-4327. For more information, contact Human Resources.

OTHER IMPORTANT INFORMATION

You Make a Difference

“None of our successes
would be possible
without the dedication
and expertise of our
employees...”

- Siegwerk Board
of Directors

Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA)

Siegwerk is committed to complying with all applicable provisions of the ADA and the ADA Amendments Act, known as the ADAAA. It is our policy not to unlawfully discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can successfully perform the essential functions of their job within the position expectations, with or without reasonable accommodations. Consistent with this policy of nondiscrimination, Siegwerk will collaborate with qualified individuals with disabilities in exploring reasonable accommodations so that they can successfully perform the essential functions of their job within performance expectations unless doing so causes a direct threat to these individuals or others that cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to the Company. The goal of reasonable accommodations are to enable employees to perform their job within the expectations of the position. For that reason, essential job functions cannot be eliminated as a form of accommodation. For example, if meeting sales or productivity goals is one of the essential functions of your position, accommodations should help you meet those goals, not eliminate or lower them. Once a job modification or accommodation is offered and made, your manager will work with you to make sure that it is enabling you to perform your job within standards. You are expected to meet the performance standards of your regular job duties, with or without accommodations. The ADA does not require Siegwerk to make the best possible accommodation, to reallocate essential functions, or to provide personal use items (e.g., eyeglasses, hearing aids, wheelchairs, etc.).

Siegwerk will not tolerate any form of retaliation against an applicant of employee on the basis of a disability, a request for a disability accommodation, or participation in a complaint or investigation of disability discrimination.

Procedure for requesting an accommodation:

Employees who need to request a medically related work accommodation should advise Human Resources as soon as the need for an accommodation becomes apparent to them. HR will promptly engage in the interactive process with the employee and management to try to identify a reasonable accommodation that enables the employee to perform the essential functions of their job absent direct threat and undue hardship. In most cases, employees requesting accommodations will be asked to provide the appropriate medical information necessary to understand the functional limitations and explore ways to accommodate those restrictions. All medical information will be maintained confidentially and management will be advised only about limitations as they relate to accommodations or modifications in the workplace. Managers, including hiring managers, who receive requests for work accommodations from employees or job applicants should consult with HR for guidance on exercising their discretion to approve routine accommodation requests or in determining undue hardship. Managers must consult with Human Resources before denying any request for an accommodation.

Harassment

Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including sexual and other forms of harassment. It is important to be sensitive to individual differences, as some forms of harassment are obviously inappropriate whereas other forms may be more subtle.

For purposes of this policy, **sexual harassment** is defined as unwelcome sexual advances, requests for sexual favors and other verbal and physical conduct of a sexual nature when, for example:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or,
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may involve individuals of the same or different gender. Other examples of harassment include, but are not limited to, sexual jokes, insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail or other electronic means).

Other forms of harassment can also include verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, age, gender identity, national origin, disability, or any other characteristic protected by law or that of his/her relatives, friends, or associates. This type of harassment may include a range of behaviors, which could include: epithets, slurs or negative stereotyping; threatening; intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through electronic means).

Reporting an Alleged Incident of Harassment, Discrimination or Retaliation

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

You are strongly encouraged to report all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Where possible, promptly advise the offender that his/her behavior is unwelcome and request that it be discontinued. If you are uncomfortable addressing the conduct with the offender, it continues or after you address it or if you feel the Company should be made aware of the incident, report any such matters to HR.

Retaliation

Siegwerk prohibits retaliation against any individual who reports discrimination or harassment in good faith or who participates in an investigation of such reports. Retaliation against an individual for good-faith reporting of harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and like harassment or discrimination itself, will be subject to responsive/disciplinary action (see below).

Investigative Process

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly by HR. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Responsive/Disciplinary Action

Harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include training, referral to counseling and/or disciplinary action such as warning, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as Siegwirk believes is appropriate under the circumstances.

Follow Up

If harassment continues, resumes, you believe you have been subjected to retaliation or you are not satisfied with the Company's response to your complaint, contact the Head of HR – CUSA or the BU President.

Training

Siegwerk Manager's and employees may be required to complete Sexual Harrassment training from time to time as a condition of ongoing employment.

Progressive Discipline

Siegwerk chooses to follow a progressive disciplinary approach in most matters that warrant disciplinary action. The disciplinary action progression may include a verbal warning, written warning, final warning, suspension, or discharge depending on the severity of the offense. The level of disciplinary action may vary and disciplinary action steps may be bypassed or combined depending on the facts of each situation and the nature/severity of the offense. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling and/or training, the employee's work record and the impact of the matter on our organization. An employee's disciplinary record may also be a deciding factor in assessing performance and salary reviews, shift change opportunities, as well as hiring decisions when applying for internal transfers or promotions.

Regular Attendance, Punctuality and Dependability

Regular attendance, punctuality and dependability are essential functions of every job at Siegwirk. Employees are responsible for knowing their shift/scheduled working hours. Absenteeism and tardiness can place a burden on co-workers and the productivity of the company. Unapproved/unexcused absences or tardiness are subject to disciplinary action even if the employee has not yet exhausted available paid time off (PTO).

In order for an absence to be approved/excused by your supervisor, it must be requested at least 24 hours in advance within ADP. Even if PTO is properly requested 24 hours in advance, supervisors have discretion to deny PTO based on business need. Any absence that is not properly requested 24 hours in advance and approved (outside of HR-approved or protected leave) is subject to the point system in the disciplinary guidelines below.

If you are sick or unable to avoid being late or absent from work you must notify your supervisor no less than 30 minutes prior to your scheduled start time. Notification of a tardy or absence less than 24 hours in advance does not serve as approval or excusal of an absence and is subject to the point system in the disciplinary guidelines below. In the event of an illness or other unexpected event, leaving early, even at the discretion of the supervisor, will be subject to the point system. Presentation of medical documentation following an absence for illness will not serve as an approval or excusal of an absence and will be subject to the point system.

Absences due to illnesses or injuries that qualify as HR-approved or state or federal protected leaves of absence, such as: FMLA, Worker's Compensation, Jury Duty, Bereavement, etc., will not be counted against an employee's attendance record. Medical documentation within the guidelines of state and federal laws may be required in these instances.

Policy Specifics

- Unapproved/Unexcused Point System Scoring:
 - No Call/No Show = 2 points
 - Absent for one (1) or more hours = 1 point
 - Tardy to work or when returning from break or meal period = ½ point
 - Leaving early (less than one hour prior to shift end time) = ½ point
 - Consecutive Day Absences = 1 point for each day out unless HR is notified and approves scoring of fewer points for consecutive days.

Disciplinary Action

Employees who are within their first 90 days of employment may receive disciplinary action up to and including termination of employment if three (3) occurrence points are accumulated within their first 90 days of employment.

Occurrence Points will be tracked based on a rolling twelve (12) month period, measured back from the date of the last (most recent) Occurrence Point.

- 5 Occurrence Points = Verbal Warning (Documented)
- 6 Occurrence Points = Written Warning
- 7 Occurrence Points = Final Written Warning and possible Unpaid Suspension
- 8 Occurrence Points = Further disciplinary action, up to and including termination of employment

Employees receiving corrective action under this policy are expected to improve their attendance/punctuality. Failure to improve and sustain improvement will result in additional correction, up to and including termination. Nothing in this policy, however, should be construed to limit the right of the Company to use discretion in applying this policy. The Company also has the right to modify, change or edit this policy at any time.

Call-in Procedures

When calling in to report unapproved/unexcused absence or tardy, you must speak directly to a member of management at least 30 minutes prior to your scheduled start time. Leaving voice messages, sending emails, notes, texts or having another person call for you (absent exigent circumstances) are not acceptable and are subject to disciplinary action. You must speak directly with your supervisor. If you are unable to reach your supervisor, you must elevate the request

until you reach another supervisor or manager. Failure to properly report your absence as outlined in this policy for three (3) consecutive days will be considered job abandonment or voluntary termination of your position with Siegwerk.

- Employees who incur 3 points within their first 90 days of employment may be subject to immediate termination.
- Leaving your scheduled shift early without supervisor approval is not allowed and may result in disciplinary action up to and including termination of employment.
- Leaving company property for non-company business without clocking out and notifying your supervisor may result in disciplinary action up to and including termination of employment.
- Although occurrence points roll-off an employee's record after twelve months, habitual offenders (those who have established a pattern of absences, such as consistently having six or more occurrences in any given twelve-month period, routinely being absent or late, calling off on Mondays or Fridays, or not following call-in procedures, etc.) may trigger discipline that will be addressed as a performance issue and may warrant accelerated progressive disciplinary action up to and including termination of employment.
- You must utilize Paid Time Off (PTO), if available, when you are absent, however if it is an unscheduled absence, it will not prevent you from incurring an attendance point

Stay Interviews

In most all areas of our business, Managers are required to complete new hire Stay Interviews. The purpose of these interviews is to make sure that the new employee is having regular, scheduled communication with their supervisor to answer any questions or concerns either may have. For additional information on Stay Interviews please contact the Human Resources Department.

Breaks & Meal Periods

It is the policy of Siegwerk to comply with state and federal laws regarding meal periods and breaks. Supervisors have the discretion to schedule breaks and meal periods, if necessary, with the goal of providing the least possible disruption to company operations. As long as in compliance with applicable laws, departments may use discretion when developing break policies or practices, based on customer and departmental demands, and such breaks may be paid or unpaid depending on the parameters. Please talk to your supervisor to understand your department's specific break policy.

Payday

Siegwerk uses a bi-weekly payroll schedule, which means that paychecks are issued 26 times per year. Employees are paid every other Friday. Each paycheck will include earnings for work performed through the end of the previous payroll period — which ends the Saturday before each payday.

In the event that a regularly scheduled payday falls on a holiday, employees will receive their paycheck on the last day of work before the regularly scheduled payday.

Paychecks are directly deposited into your designated savings or checking accounts. Paystub records are accessible on the ADP Portal at <https://workforcenow.adp.com>.

Overtime Guidelines

All Non-Exempt Employees

Siegwerk complies with state and federal overtime laws for non-exempt employees. Federal law requires that non-exempt (or hourly) employees are entitled to overtime pay for hours that exceed 40 hours worked within a one-week period. Each workweek begins on Sunday and ends the following Saturday. Overtime is calculated at a rate of one and one-half times the non-exempt employee's regular hourly rate of pay. Paid leave, such as holiday, jury duty pay, bereavement or PTO is not calculated as hours worked toward the determination of overtime payment.

We expect all of our non-exempt employees to be conscious of their time. Employees who anticipate the need for overtime to complete the week's work must notify their supervisors in advance and obtain approval prior to working hours that extend beyond their normal schedule. There are occasions, however, when employees are either offered the opportunity to work overtime or are required to work beyond their scheduled shifts in order to meet customer demands. If overtime is required, every effort will be made to provide advance notice.

Supervisors

Supervisors are responsible for monitoring the time worked of their employees for both safety and cost reasons. Supervisors must obtain approval from management prior to the use of overtime in their department. Supervisors who authorize overtime without prior approval from management, or who continually rely on the use of overtime hours to complete a week's work without it being deemed appropriate by management may be subject to disciplinary action.

Shift Incentive Pay

Shift incentive/differential pay is an additional amount of compensation paid to employees who work afternoon, night and/or weekend shifts. Employees paid by hours calculated on a time clock are paid shift differential for hours worked off-shift as local policy dictates.

The differential amount may vary, depending on the geographic area, position and schedule.

Performance and Compensation Programs

Our total compensation programs are intended to attract, retain and motivate a high performing team supported by high performing individuals.

Each Siegwerk employee receives an annual performance review that includes a mid-year component to evaluate progress with assigned goals and overall competency review. Base salaries are reviewed annually – typically in April. Salary adjustments are considered based on a review of factors. These factors include, but may not be limited to, Company performance, your job performance, your job level, your compensation ratio or where your salary falls within your applicable salary range.

Total compensation also includes benefits. Many employees are unaware of the substantial dollar amount that Siegwerk contributes toward their benefits. Our goal is to continue to work toward

providing a competitive benefits program, which provides for employee latitude in determining the most appropriate benefit mix, based on individual preferences.

Direct Deposit

Siegwerk participates in mandatory Direct Deposit. Your paycheck will be directly deposited for you into one or more bank accounts (up to three are allowed). As a benefit, many banks and credit unions offer free checking to customers who take advantage of direct deposit.

Time Records

All non-exempt (hourly) employees are required to use the time clock system to record their hours worked for payroll and attendance purposes.

Our time clock records are legal records and care must be taken in accurately recording hours worked, as well as absences. Whether you swipe a time card through a time clock machine on-site or record your punches daily by our web-based “Time Clock” system, there are several key points to remember:

- Never clock in or out for other employees. Doing so could result in disciplinary action up to and including termination of employment.
- Clock in and out each work day. Do not enter punches for multiple days for yourself or someone else at one time. (Example – entering an entire week’s punches on Monday morning).
- If you forget to clock in or out, you must notify your supervisor immediately so the time may be accurately recorded for payroll.
- Never clock in or out from any computer that is not a designated work site computer. (Example – do not enter your “Time Clock” punches from home or from a cell phone.)
- Failure to comply with clock in/out procedures may result in disciplinary action up to and including termination of employment.

Employees not eligible for overtime (exempt) are not required to clock in/out; however, as stated in the Time Off section of this handbook, paid time off (PTO) used for vacation, short-term illness, etc, must be submitted and recorded via the ADP Portal at <https://workforcenow.adp.com>. If exempt employees are absent for reasons which would alter their regular earnings, such as for jury duty, workers’ compensation, suspension, leave of absence, etc., the employee and/or supervisor must report this status to the HR Department. The HR Department ensures that payroll is provided with accurate compensation information per location.

It is Siegwerk’s policy to prohibit unlawful salary deductions from exempt employees. Siegwerk intends to pay its exempt employees on a salary basis and will not make any deductions from their salaries that are prohibited under the Fair Labor Standards Act. Complaints regarding improper deductions should immediately be brought to HR’s attention. Exempt employees who believe they have been subjected to unlawful deductions should contact the HR Department. If it is determined that an improper deduction has been inadvertently made, the employee will be reimbursed.

Acceptance of Gifts

No employee may solicit or accept gifts of more than \$25.00 in value, lavish entertainment or other benefits from potential and actual customers, suppliers or competitors. Special care must be taken to avoid even the impression of a conflict of interest.

An employee may entertain potential or actual customers if such entertainment is consistent with accepted business practices.

Dress Code

Uniforms and Protective Attire

Employees who are issued a uniform, lab coat, and/or protective equipment are expected to wear them according to expectations. Failure to do so, especially if it is a safety violation, is grounds for disciplinary action including and up to termination.

Office Attire

When there are no announced visitors in the office, Siegwerk has a “casual” dress code for office employees who work in areas in which a uniform or protective attire is not required. Employees are expected to wear clothes that make them feel comfortable yet still give a professional look.

If visitors are scheduled, business attire is requested for all applicable employees (those not required to wear a uniform or protective attire). Typically, a memo will be sent informing you of the dates.

The following list should help you determine what appropriate attire is during business hours:

<u>APPROPRIATE:</u>	<u>NOT APPROPRIATE:</u>
Business attire	Tank-tops
Polo shirts	Shorts
Blouses	Midriff shirts
Oxford shirts	Ill-fitting attire (i.e. too tight or too short)
Sweaters	Clothing that is damaged (holes/tears etc.)
Slacks	Athletic pants
Capri Pants	
Khaki Pants	
Blue Jeans	

While Siegwerk is not considered a fragrance-free environment, employees are expected to be respectful to any sensitivities or allergens of their co-workers to strong odors. If odors or fragrances are found to be offensive, you may be asked to take the necessary steps to eliminate

the intensity of any scents, up to being required to go home and change. Should this be the case, the time needed to go home and change and return to work may be unpaid.

Emergency Closings

Emergency conditions, such as severe weather, fires, or power failures, can disrupt Company operations. In extreme cases, these circumstances require the closing of a work facility. When operations are officially closed due to emergency conditions, the time off from scheduled work will be unpaid. Employees in essential operations may be asked to work when operations are officially closed. In these circumstances, employees who work will receive regular pay.

Inclement Weather

During instances of inclement weather employees should consider their own safety first and use their best judgement. In some cases of local area inclement weather, the company may excuse any related attendance policy violations.

Call-into Work Minimum Pay

An hourly employee who comes into work outside their normal work schedule will be paid for a minimum of two hours or for the actual hours worked, whichever is greater.

Secondary Employment

In general, outside work activities are allowed, as long as they don't:

- Prevent you from fully performing work for which you were employed, including overtime assignments.
- Involve organizations that are doing or seek to do business with Siegwerk, including actual or potential vendors or customers.
- Involve competitors

From time to time, you may be required to work beyond your normally scheduled hours. In most cases, you must perform this work when requested. In cases of conflict with any outside activity, your obligations to Siegwerk must be given priority.

Reference Checks

All inquiries regarding a current or former Siegwerk employee must be referred to HR. Do not issue a reference letter to any current or former employee without first consulting with the HR Department.

Typically, we furnish or verify a current or former employee's name, dates of employment, job title and department. Generally, no other data or information will be furnished unless the individual authorizes a release to furnish this information.

Solicitation and Distribution

In an effort to ensure a productive and harmonious work environment, we do not allow individuals not employed by Siegwerk to solicit or distribute literature anywhere on Siegwerk property.

We recognize that you may have interests in events and organizations outside the workplace. However, we ask that you not solicit or distribute literature concerning these activities during working time and that you not distribute literature at any time in working areas.

Inspections

Siegwerk reserves the right to question employees and all other persons entering and leaving our premises, including parking lots. Siegwerk also reserves the right to inspect vehicles, parcels, purses, handbags, briefcases, lunch boxes, toolboxes, containers, or any other possessions carried to and from Siegwerk property. In addition, Siegwerk reserves the right to search any employee's office, desk, files, locker, or any other area or article on our premises. This includes employee voicemail, email, and other electronically stored data files. All offices, desks, files, lockers, and so forth are the property of Siegwerk and are issued for the use of employees only during their employment with Siegwerk.

Human Resources must be notified and present before any search activities are conducted. Personal locks on Siegwerk property that are in use are subject to removal at any time with or without prior notice and by whatever means are necessary for removal.

Lunchroom and Other Facilities

Many of our employees prefer to bring their lunches to work. For your convenience, all Siegwerk facilities have lunchrooms. Remember to be considerate of other employees by returning plates, utensils, etc., to their proper place, and to keep the table and counter tops clean.

In several locations, dishwashers are available, and each employee is required to place his/her own dishes, utensils, cups and glasses in the dishwasher - please remember that this is your responsibility. If your facility has a newspaper or magazines, please pick them up after use or return them to their proper place.

If you use a Siegwerk locker room and shower, please do not leave trash on the floor or empty shampoo/conditioner bottles in the showers. Above all be respectful of your co-workers.

Company Vehicles

Only employees meeting qualifications set out and authorized by Siegwerk and who have signed the Fleet Vehicle Safety Program Agreement may operate Siegwerk automobiles to conduct Company business. If using a non-Siegwerk automobile to conduct Company business, it is the responsibility of the employee to obtain adequate insurance for their automobile. Every employee driving on behalf of Company business must operate the vehicle in a safe manner and follow all applicable motor vehicle regulations.

Only assigned CDL drivers with approval from Siegwerk may operate the commercial classed trucks (straight trucks and tractor-trailers). Further information is available through our "Fleet Safety Program" located on the ADP website.

Nepotism

For the purposes of this policy, a relative is defined to include spouses, parents, children, brothers, sisters, brothers and sisters-in-law, fathers and mothers-in-law, nieces, nephews, stepparents,

stepbrothers, stepsisters, and stepchildren. This policy also applies to individuals who are not legally related but who reside with another employee.

As of February 1, 2013, relatives of persons currently employed may be hired/promoted under the following conditions:

- The relative must work in a different department or on a different shift AND may not be in a position where the relative has authority to increase salary or approve promotion of the related employee.
- No supervisor or department manager is to have direct supervision of their relative. At no time can there be a chain of command that involves relatives.

If an employee becomes related to another employee or begins to reside with another employee, conditions above must be met.

Any working relationship that existed prior to February 1, 2013 will be allowed to continue until dissolved.

HEALTH & SAFETY

ZERO ACCIDENTS

Offering our employees, a safe and pleasant work environment is a matter of utmost priority.

Safety

Providing a safe workplace is a primary concern to Siegwerk and every reasonable effort shall be made to achieve that goal. Our Safety Department and your supervisor will orient you to Siegwerk safety standards and precautions. Employees must protect their own safety and the safety of others by working in compliance with safe work practices and procedures established by the Company. Certain safety requirements are particularly important, such as wearing required equipment. It is the responsibility of all employees to immediately report any accident, work related injury or illness, violation of safety standards, or unsafe condition to the appropriate supervisor. Supervisors are responsible for taking immediate action to solve such problems. Failure to follow safety standards or report an accident or injury may lead to disciplinary action up to and including termination of employment.

General Safety Policies

Siegwerk makes safety the first priority. All policies and procedures are developed with this in mind. Below is a list of general Safety Policies that Siegwerk expects all employees to follow. Violations of any Safety Policies may be cause for corrective action up to and including termination. Note: This list is not inclusive of all safety policies or safety rules. You will receive additional training on the safety policies and procedures for your specific position with the company.

1. You must complete proper training and be authorized by your supervisor to operate equipment in the plant. You are required to ask your supervisor questions when you are unsure of a task you need to complete.
2. Obey all posted safety rules. Only the HSE Manager or their designee can remove posted safety rules or signs.
3. All incidents involving injury to an employee or damage to equipment must be reported to a supervisor as discovered or recognized.
4. Report unsafe conditions including defective tools to your supervisor as discovered or recognized.
5. Do not wear loose clothing or jewelry in the production areas. All employees must abide by the Siegwerk dress code for your particular area.
6. Always maintain your assigned personal protective equipment in a sanitary condition.
7. Eye protection is required for anyone entering or working in the production areas where signs are posted. Goggles or face shields are required when working around pressurized systems.
8. Contact lenses may be worn in the lab, but only when accompanied with eye protection and/or as required goggles.
9. Foot protection (safety toed shoes) is required for all employees working in the production and warehouse areas. Electrostatic Dissipation (ESD) shoes required in solvent based operations. (Includes both production and In-House facilities).
10. Respiratory protection is required to be worn for specific operations designated by HSE.
11. Hearing protection is required be worn when operating pneumatic tools or working in areas designated by HSE as having a noise hazard.
12. Bonding and grounding procedures shall be followed at all times! (Example: when transferring flammables from container to container or while processing solvent based inks).
13. All containers of finished product, hazardous materials or hazardous waste must be properly labeled at all times. Employees are required to contact their supervisor for replacement labels.

14. No Siegwerk employees are authorized to enter any area labeled / signed as a confined space.
15. All machine guards and safety devices must be in place before, during and after operation of machine.
16. Each disperser blade should be equipped with a guard covering the blade when the disperser is not in operation. Never leave an unguarded disperser blade elevated and unattended.
17. Do not block exit doors, emergency equipment, firefighting equipment, electrical panels and eye wash stations. Do not leave materials in aisles, walkways, stairways, or other points of egress (exits).
18. Eating food, candy or snacks in the production areas is PROHIBITED.
19. Drinking beverages in open containers (cans, glasses, etc.) is PROHIBITED in the production area. Containers must be closed and sealable.
20. Do not walk under the overhead loads from the hoists and forklifts.
21. Clean-up all spills, and pick-up debris immediately or as discovered.
22. To protect your health and safety; uniforms, protective clothing, and PPE, cannot be removed from company property. Changing areas and storage lockers for these items are provided.
23. No personal electronic devices (cell phones, smart phones, iPods, radios, MP3 players, etc.) are allowed in production, warehouse or areas identified as prohibited by our customers. Please leave personal electronic devices in your locker.

This list is not inclusive of all safety policies or safety rules. You will receive additional training on the safety policies and procedures for your specific position with the company.

Safety Equipment Reimbursement

Safety Footwear

Safety-toed footwear is required in any production area. Electrostatic Dissipation (ESD) shoes are required in solvent based operations with either an EX or EE hazard rating (Includes both production and In-House facilities). If you are unsure about the requirements as they pertain to you, please contact the supervisor or Human Resources. New employees who have positions in production will be given an authorization form to purchase a new pair of safety-toed shoes from a local store, where the store directly bills Siegwerk, Siegwerk will reimburse the employee up to \$140.00 for the initial purchase of safety footwear meeting all applicable requirements. Any temporary worker from a staffing agency is eligible for reimbursement at the point they get hired on a permanent basis, if applicable or 90-days, whichever is later. Submit receipt to the HR/HSE Specialist. Receipts are REQUIRED for reimbursement. If an employee quits or is terminated by Siegwerk within the first 90 days of employment, Siegwerk will deduct the cost of the safety-toed shoes out of the employee's final paycheck.

Siegwerk will purchase safety footwear meeting the applicable requirements at approved vendors every 2 years after the initial date of purchase or earlier as per the discretion of the supervisor. The employee must complete a Safety Footwear Authorization form, and have it signed by their supervisor. Forms are available through the applicable manager or on the ADP Portal at <https://workforcenow.adp.com> in the forms library located within the Resources dropdown menu. The completed form must be presented to the footwear vendor. The footwear vendor will bill Siegwerk directly.

Safety Eyewear (Prescription)

All employees are required to wear provided protective eyewear. Those who utilize prescription “street” glasses will be provided with safety glasses that fit over their prescription “street” glasses until they are eligible for the safety prescription eyewear benefit.

Siegwerk will provide an authorization form for an employee to take their prescription to a local eyewear provider where they can order prescription safety glasses that will be mailed to the employee’s home. This provider will direct bill Siegwerk up to \$140. If an employee quits or is terminated by Siegwerk within the first 90 days of employment, Siegwerk will deduct the cost prescription safety glasses out of the employee’s final paycheck.

Siegwerk will purchase safety eyewear every 2 years after the initial date of purchase or earlier as per the discretion of the supervisor.

Each employee must complete a Safety Eyewear Authorization form and have it signed by their supervisor. Forms are available through the applicable manager or on the ADP Portal <https://workforcenow.adp.com>. The completed form must be presented to the vision center. The vendor will invoice Siegwerk directly.

*Only approved footwear and prescription safety glasses will be paid for by Siegwerk. Guidelines for footwear and glasses are outlined on the Authorization forms. Charges above those outlined on the Authorization form are to be paid by the employee at the time of purchase.

Medical Emergency Procedures

In the event of an injury or other medical emergency that is life threatening or resulting in loss of consciousness, please dial 911 for Emergency Medical Services, send someone to notify the Supervisor, Plant Manager, and/or HSE. Follow the instructions of the emergency dispatcher until help arrives and send someone to meet the ambulance if possible.

If the injury is non-life threatening, send someone to notify the supervisor and only render first aid if you are knowledgeable and willing. If the supervisor or the injured party feels medical attention is warranted, the person should be driven by a company representative to an appropriate medical facility. If the employee refuses medical treatment but the supervisor feels medical attention is warranted, the refusal must be made in the presence of a medical professional (occupational clinic or hospital) who will document the refusal. The injured employee’s supervisor is responsible for completing an Illness/Injury Report and submitting it to the HSE Department within 24 hours of the incident.

INFORMATION TECHNOLOGY

The Digital Age

“Technology is best
when it brings people
together.”

-Matt Mullenweg,
Social Media
Entrepreneur

Bring Your Own Device

The Bring Your Own Device (BYOD) Policy applies to eligible staff enabling them to perform their job responsibilities by providing Siegwerk Mail, Calendar and Collaboration Services on privately owned mobile devices. Partial cellular plan cost reimbursement is also provided for these participants. For questions about your eligibility, reimbursements etc. please contact Human Resources. A full copy of the BYOD Policy can be found on the ADP website and the Siegwerk Intranet.

Appropriate Use of Company Equipment

Depending upon your position, Siegwerk may provide various supplies, uniforms, office and operational equipment, automobiles or other materials necessary for you to perform your job. You are expected to exercise care in the use of Company equipment and property; you may be responsible for replacement costs if you are negligent. Loss, damages or theft of Company property must be reported at once to your supervisor.

If your employment with Siegwerk ends, you must return all Company property, uniforms, equipment, cell phone, work documents, etc.

Electronic Communication: E-Mail, Voice Mail and Internet

Many employees are provided with e-mail, voice mail and Internet. These tools have been added in order for us to operate more efficiently and effectively.

While these systems/devices are to be used primarily for job-related and business-related purposes, we recognize that many of you receive personal e-mail and voice mail messages. Such use is permissible as long as it is limited, and it does not interfere with job performance.

However, use good judgment when using these communication systems/devices. Although e-mail and voice mail messages may not necessarily reflect the views of Siegwerk, and always ensure that the information contained in these messages is accurate, appropriate and lawful. Examples of non-acceptable use are profanity, pornography, and derogatory or discriminatory remarks regarding race, gender, religion, national origin, etc.

In addition, these systems/devices may not be used during working time to solicit for religious or political causes, commercial enterprise, outside organizations, or other non-job-related solicitations, with the exception of Company-sponsored events approved by the BU President.

Siegwerk does not intend to regularly review employee e-mail and voice mail records, however, employees have no right of privacy with respect to stored e-mail and voice mail records. Moreover, these records are to be treated like shared paper files, with the expectation that anything in them is available for review.

Unless in connection with legitimate Company commercial communications or as part of your job responsibilities, transmitting Company confidential information or Company-owned information or data from a Company server, database or computing asset, or by means of a Company email address, to (1) a computer or other device, (2) a personal email address or account or (3) another personal electronic database maintained by you or any non-Company person or entity, including without limitation any social networking or internet storage site (e.g., Facebook, Twitter, GoogleDocs). Employees are prohibited from transferring Company information to their personally owned computers or devices, even for work purposes.

Please also refer to the Bring Your Own Device Policy. Copies available electronically on the Siegwerk homepage and in ADP.

Acceptable Internet Use Policy

While the Internet can serve as a useful tool in connection with your employment, it can also serve as a serious distraction. Moreover, it can be a threat to the security of Company information. Therefore, a detailed usage policy was designed to help you understand how to use this resource appropriately and wisely.

The Internet is provided at a significant cost to the Company. The Internet is provided for business-related purposes, i.e., to communicate with customers and suppliers, to research relevant topics and obtain useful business information (except as outlined below). Unnecessary or unauthorized Internet usage causes network and server congestion. It slows other users, takes away from work time, consumes supplies, and ties up printers and other shared resources. Unlawful Internet usage may also garner negative publicity for the Company and expose the firm to significant legal liabilities.

You must conduct yourself honestly and appropriately on the Internet, and respect the copyrights, software licensing rules, and property rights, just as you would in any other business dealings. All existing Company policies apply to your conduct on the Internet, especially (but not exclusively) those that deal with intellectual property protection, privacy, misuse of Company resources, harassment, information and data security, and confidentiality.

While access to the Internet offers benefits, it can also jeopardize the security of our data and systems if we do not follow appropriate measures. Consequently, it may be necessary to prevent computers with sensitive data or applications from connecting to the Internet entirely, or certain users may be prevented from using certain Internet features, like file transfers.

Security: Everyone's First Concern

Certain terms in this policy should be understood expansively to include related concepts. "Company" and "Siegwerk" includes our affiliates, subsidiaries, and branches. "Document" covers just about any kind of file that can be read on a computer screen as if it were a printed page. "Graphics" include photographs, pictures, animations, movies, or drawings. "Display" includes monitors, flat-panel active or passive matrix displays, monochrome LCD's, projectors, televisions and virtual-reality tools.

Internet Policy Provisions

- The Company has software and systems in place that will monitor and record all Internet usage.
- We reserve the right to inspect any and all files stored in private areas of our network in order to assure compliance with policy.
- Sexually explicit material or otherwise offensive material or language may not be displayed, archived, stored, distributed, edited or recorded using our network or computing resources.
- Use of any Company resources for illegal activity is grounds for immediate termination, and we will cooperate with any legitimate law enforcement activity.
- Any software or files downloaded via the Internet into the Company network become the property of the Company.

- No employee may use Company facilities knowingly to download or distribute pirated software or data.
- No employee may use the Company's Internet facilities to deliberately propagate any virus, worm, Trojan horse, or trap-door program code.
- Only those employees or officials who are duly authorized to speak to the media, to analysts or in public gatherings on behalf of the Company may speak/write on behalf of the Company to any newsgroup or chat room.
- Employees releasing protected information via a newsgroup or chat (whether or not the release is inadvertent) will be subject to all penalties under existing data security policies and procedures.
- Employees may use their Internet facilities for non-business research or browsing during breaks, or outside of work hours, provided that all other usage policies are adhered to.
- Employees with Internet access may not download software. Please contact the IT helpdesk for assistance with downloads.
- Employees with Internet access may not use Company Internet facilities to download entertainment software or games, or to play games against opponents over the Internet.
- Employees with Internet access may not upload any software licensed to the Company or data owned or licensed by the Company without explicit authorization from the manager responsible for the software or data.
- Employees will refrain from creating or forwarding chain letters, Ponzi or pyramid schemes of any kind.
- Any form of harassment via email, telephone or paging will not be tolerated and any employee engaging in such will be subject to disciplinary action up to and including termination of employment.
- Employee communicating on the Internet about the Company who are not authorized to speak on behalf of the Company (see number 8 above), will identify themselves as Company employees and indicate that they are not speaking on the Company's behalf.

Technical Provisions

- User IDs and passwords help maintain individual accountability for Internet resource usage.
- Any employee who obtains a password or ID for an Internet resource from Siegwerk must keep that password confidential. You may not share user ID's or passwords obtained for access to Internet sites.
- Employees needing to transfer video downloads, mass e-mailings and the like are to be scheduled for off-peak times.
- Any file that is downloaded must be scanned for viruses before it is run or accessed.

Security Provisions

- The Company has installed an Internet firewall to assure the safety and security of the Company's networks. Any employee who attempts to disable, defeat or circumvent any Company security facility will be subject to immediate dismissal.
- Files containing sensitive Company data, as defined by corporate data security policy, which are transferred in any way across the Internet must be encrypted.
- Only those Internet services and functions with documented business purposes for this Company will be enabled at the Internet firewall.