



NIKKEI MC ALUMINUM AMERICA, INC.

**Team
Member
Handbook**

April 2025 Revision

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I. COMPANY OVERVIEW

WELCOME TO NIKKEI MC ALUMINUM AMERICA, INC.

As fellow team members, we will be working together to continue a strong tradition of quality, workmanship, and customer service. To accomplish this goal, we must remember the importance of every member's contribution to the Nikkei MC Aluminum America, Inc. (NMAA) team. Your performance will directly impact the quality of our products and the way we are viewed by our customers. Each team member is asked to assume responsibilities to ensure that products meet the quality standards our customers require. We shall ask our team members to be involved in the development of quality products and be aware of conditions that have a direct impact on these products.

We are pleased that you have joined the NMAA team. Teamwork is the foundation of our success, and it is only possible when a good relationship exists among all team members. To accomplish this, we must maintain a friendly and sincere atmosphere of communication, so that questions can be answered, and potential problems resolved. We urge you to help us effectively communicate by discussing your ideas, questions, or concerns with an appropriate member of the NMAA management team. We also encourage you to actively participate in continuous improvement programs, employee suggestion programs, and other opportunities. We strive to work cooperatively to achieve the common goal of making this plant a safe and successful operation and a good place to work.

Just as you have expectations of NMAA, we have expectations of you. Our expectations include:

- Consistently giving your best effort and accepting responsibility for achieving objectives
- Accepting personal responsibility for maintaining a safe work environment
- Accepting responsibility for producing quality work
- Accepting responsibility for being at work when scheduled
- Actively participating as a team member
- Treating coworkers, customers, and vendors with respect
- Having flexibility to do the job that needs to be done
- Recognizing that giving and receiving suggestions for improvement is to everyone's advantage

TEAM MEMBER RELATIONS PHILOSOPHY

Team members of NMAA are the most important factor in the success of the company. Team members will be treated as mature and responsible adults who deserve the full respect and trust of fellow coworkers. It is NMAA's intention that in our day-to-day relationships, we will respect the personal dignity and worth of everyone in our organization.

ABOUT THIS HANDBOOK

This handbook is designed to provide all team members with an overview of NMAA and an outline of our personnel policies, practices, and procedures. It is also intended to welcome you as a part of the NMAA team. We refer to our employees at NMAA as “team members” because we are all members of the same NMAA team. We hope you will share a sense of pride in our operation and in the quality products we produce. The success of our operation depends upon the combined best efforts of all our team members.

The policies contained in this handbook are guidelines for the management of our business. While all team members are expected to abide by the policies established by NMAA, these guidelines are drafted to allow NMAA the flexibility to address workplace issues as management determines individual circumstances warrant. **This handbook supersedes any previous company handbook, application, memoranda, or materials provided. NMAA reserves the right to revoke, modify, supplement, or interpret any of the policies, practices, and procedures in this handbook, as needed.** Should such a change occur, NMAA will make every effort to notify you of changes. All team members are expected to abide by the most current policies and procedures.

To be truly helpful and readable, a manual such as this should not be too detailed; everything simply cannot be included. Team members should follow all policies and procedures as outlined but must never use the manual as an excuse to act contrary to what common sense would dictate. Please read this handbook carefully. Your understanding of its contents and your suggestions for improvements will ensure good working relationships now and in the future.

Refer to the Human Resources Department for more detailed and updated information on the laws, rules, and policies that apply to Nikkei MC Aluminum America, Inc. employment. The information in this handbook is applicable to all NMAA full-time and part-time team members.

IMPORTANT NOTICE - DISCLAIMER

This Team Member Handbook is a guide to the general employment procedures and policies of Nikkei MC Aluminum America, Inc. This handbook is provided for information only and is not a contract of any kind for any duration. Any NMAA policy or procedure, including those referenced in this handbook, may be modified, amended, or discontinued by the company at any time, with or without notice.

This handbook contains significant changes from prior handbooks and supersedes all other handbooks or similar materials which have been published or distributed. Effective immediately, all prior handbooks, manuals, or policies covering topics now addressed in this handbook are superseded.

This handbook does not and is not intended to address every employment/employee situation. NMAA reserves the right to take action or make a decision which is inconsistent with the provisions of this handbook to address unique situations on a case-by-case basis.

This handbook is not intended to be all-inclusive. Additional information regarding company policies, procedures, and practices can be found in the NMAA Corporate Manual. Neither this handbook, nor any other manual, policy, or other document alters in any way the "At-Will" employment status of NMAA employees. "At-Will" employment means that either the employee or NMAA can terminate the employment relationship at any time, for any or no reason, with or without cause and with or without notice. No contrary statement by any NMAA employee, manager, supervisor, or agent shall have any force and effect.

These policies do not, in any manner, prohibit employees from discussing among themselves or with others their wages, benefits, and other terms and conditions of employment or workplace matters of mutual concern or prohibit activities that are protected by the National Labor Relations Act.

COMPANY INFORMATION

Nikkei MC Aluminum America, Inc. produces primary and secondary aluminum alloys that are supplied primarily to automotive casting and die-casting industries in North America. NMAA is located in Columbus, Indiana and started operations in 1990.

NMAA is a group company of Nikkei MC Aluminum Co., Ltd. (NMA). NMA is a Japanese aluminum alloy company and was established as a joint venture between Nippon Light Metal Company Ltd. and Mitsubishi Corporation in April 2007. The NMA group operates four plants in Japan and five additional plants located in the United States, China, Thailand, India, and Mexico. NMA researches and develops new aluminum alloys and has a wide range of technologies acquired by being a member of the Nippon Light Metal Group.

NMAA UNION-FREE STATEMENT

It is NMAA's strategic initiative to maintain a competitive position in the marketplace. To this end, it is a distinct competitive advantage to maintain a union-free, highly performing workplace. Our goal is to manage the business in such a manner that a need for union representation does not exist among its union-free team members.

NMAA believes that the work conditions, wages, and benefits it offers to its team members are competitive with those offered by other employers in this area and this industry. If team members have concerns about work conditions or compensation, they are strongly encouraged to voice these concerns openly and directly to management.

Our experience has shown that open communication allows for a free exchange of ideas and concerns enabling the company to quickly respond to changing requirements and circumstances. NMAA is committed to keeping the company union-free to create the best work environment ensuring the continued success of all our team members, now and in the future.

“KAIZEN” AND TEAM MEMBER PARTICIPATION

KAIZEN, the search for continuous improvement, should always be applied to our work methods and activities. It is a philosophy of finding and eliminating waste in machinery, materials, labor or methods of production and office procedures. NMAA believes time is a person’s most precious commodity. Therefore, we must all try to eliminate unnecessary movements and maximize our productive time while doing our jobs. KAIZEN results in improved productivity, quality, and customer satisfaction. It can also lead to a more positive company culture that encourages team members to be creative and to design their jobs in the most effective manner.

We encourage all NMAA team members to actively participate in the improvement of our operation. We believe each of our team members can help make NMAA a better company by developing and communicating their ideas through team member involvement programs or other formalized programs, such as the Team Member Suggestion Program. Improving our operation and ourselves will be an ongoing process. We must never be satisfied with simply maintaining our level of performance. It is up to all team members to always apply KAIZEN to improve our business operations.

THE 5S PHILOSOPHY

5S is a workplace organization methodology derived from Japanese principles, aiming to create a clean, organized, and efficient work environment by following five steps: Sort, Set in Order, Shine, Standardize, and Sustain.

The 5S Philosophy focuses on effective workplace organization and standardized work procedures. 5S simplifies the work environment, reduces waste and non-value activity while improving quality, efficiency, and safety.

- **S**ORT (Seiri) – Eliminate unnecessary items from the workplace.
- **S**ET IN ORDER (Seiton) – Arrange items that are needed so that they are ready and easy to use. Clearly identify locations for all items so that anyone can find them and return them once the task is completed.
- **S**HINE (Seiso) – Clean the work area and equipment on a regular basis to maintain standards and identify defects.
- **S**TANDARDIZE (Seiketsu) – Revisit the first three phases of 5S and confirm the condition of the workplace using standard procedures.
- **S**USTAIN (Shitsuke) – Monitor and maintain the organized and standardized workplace with focus on continuous improvement.

Safety is considered the inherent sixth “S” within the context of 5S methodology.

II. YOUR EMPLOYMENT AS A MEMBER OF THE NMAA TEAM

EQUAL EMPLOYMENT OPPORTUNITY

Nikkei MC Aluminum America, Inc. is an equal employment opportunity employer. It is NMAA's policy to recruit, hire, train and promote into all positions the most qualified candidate without regard to race, color, religion, sex, national origin, ancestry, age, veteran status, disability, pregnancy, sexual orientation, gender identity, genetic information, military status, citizenship status, or any other classification whose consideration is prohibited by applicable law.

Any team member with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of their supervisor, a member of management and/or the Human Resources Department. Team members can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination or retaliation will be subject to disciplinary action, up to and including termination of employment.

AMERICANS WITH DISABILITIES ACT OF 1990 (ADA)

Nikkei MC Aluminum America, Inc.'s ADA goals are to ensure all applicants and employees are not discriminated against because of a disability. NMAA is committed to complying with all the relevant and applicable provisions of the Americans with Disabilities Act of 1990, as amended (ADA). It will not discriminate against any qualified employee or job applicant because of a person's physical or mental disability or because the person requested accommodation.

NMAA will take appropriate steps to provide reasonable accommodation, upon request, to qualified individuals with disabilities so long as doing so does not cause an undue hardship. The individual must be qualified to safely perform the duties and assignments that are essential functions of the job. Questions regarding reasonable accommodation and/or discrimination based on disability should be directed to Nikkei MC Aluminum America, Inc.'s Human Resources Department.

PREGNANCY-RELATED ACCOMMODATIONS

Nikkei MC Aluminum America, Inc. is committed to providing a work environment that supports the health and well-being of all employees, including those affected by pregnancy, childbirth, or related medical conditions. In accordance with the Pregnant Workers Fairness Act (PWFA) and other applicable laws, NMAA will provide reasonable accommodation to qualified applicants and employees with limitations related to pregnancy, childbirth, or related medical conditions, unless doing so would cause undue hardship.

NMAA prohibits any form of discrimination or retaliation against applicants or employees for requesting or receiving pregnancy-related accommodation. Questions regarding reasonable accommodation and/or discrimination based on pregnancy, childbirth, or related medical conditions should be directed to Nikkei MC Aluminum America, Inc.'s Human Resources Department.

IMMIGRATION LAW COMPLIANCE

Nikkei MC Aluminum America, Inc. is committed to employing individuals who are legally authorized to work in the United States and does not unlawfully discriminate on a basis of citizenship status, national origin, race, religion, or color.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present appropriate documentation establishing identity and employment eligibility. Former employees who are rehired must also complete an I-9 form upon their rehire date.

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

EMPLOYMENT APPLICATIONS

Nikkei MC Aluminum America, Inc. relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in NMAA's exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment, regardless of when such information is discovered.

EMPLOYMENT QUALIFICATIONS

It is the policy of Nikkei MC Aluminum America, Inc. to hire the most suitable candidate for each job opening. Employment opportunities are and shall be open to all qualified applicants who are eighteen years of age or older and meet additional hiring criteria. Applicants are considered solely based on their experience and demonstrated aptitude and abilities.

BACKGROUND CHECKS

A general background investigation, in accordance with the Fair Credit Reporting Act (FCRA), is conducted on all individuals considered for employment and on the statements submitted by the applicant on the application form or resume. The following items may be included in the background check:

- Criminal history – county, state and/or federal
- Prior employment verification
- Credit history
- Education/academic verification
- Professional license verification
- Vehicle operation records
- Sex and violent offender registry
- Social Security verification

LENGTH OF SERVICE

Your service date will be your first day of employment as a regular full-time team member. Your length of service consists of the time you have worked for NMAA since your service date. If you quit or your service is terminated and you are rehired, the rehire date becomes your new service date.

Length of service is a factor used to determine vacation eligibility and eligibility dates for certain benefits, such as major medical benefits, retirement savings plan, disability pay and holiday pay. It may also be used as one of the factors to determine future job assignments and promotions.

EMPLOYMENT VERIFICATIONS

The Human Resources Department will respond to all reference check inquiries from prospective employers, credit organizations, or other entities checking references on current or former team members. Responses to such inquiries will confirm only dates of employment, and the position(s) held; wage rate will only be verified by mail or fax. Any team member who receives a request for a reference must forward the request to the Human Resources Department and is not to respond to the request themselves.

PERSONNEL RECORDS

Personnel records will be maintained for each NMAA team member. The personnel file is kept by the Human Resources Department and includes such information as the team member's job application, resume, documentation of performance appraisals and wage increases, and other employment records. All files are the property of NMAA and access to the files is restricted. Team members who wish to review their files should contact Human Resources.

To keep personnel information updated, team members should report any of the following changes to the Human Resources Department as soon as they occur:

- Name, address, and telephone number
- Marital status
- Birth of dependents, total number of dependents and their relationship to you
- Citizenship status or legal work status
- Benefit plan beneficiary designations
- Person(s) to be notified in case of emergency
- Formal education courses completed
- Other training or professional skills acquired

In consideration of the confidentiality and privacy of personnel file records, access to these records will be restricted to the following:

- Human Resources Department or official custodian of personnel records
- Only the supervisor or manager(s) in the organization who have a legitimate business need to access the file
- An actively employed team member who requests to see his/her own personnel file
- Agencies or organizations entitled by law may access information through subpoena, court order, administrative order or request

In addition, a medical information file is maintained by the Human Resources Department and is kept separate from the personnel file. This file contains confidential personal health-related information such as medical and life insurance applications and forms, FMLA documentation, physician statements, etcetera. The team member's medical file is kept under strict control.

No information in any of the files will be disclosed to anyone outside the organization without written consent from the team member or former team member specifically authorizing the release of information or as otherwise required or allowed by law. NMAA reserves the right; however, to verify basic information, such as dates of employment, employment status and job title, without notification to the individual involved, and to cooperate with law enforcement, public safety, or medical officials who have a valid need to ascertain limited, specific information about an individual.

PERSONAL DEVELOPMENT

At NMAA, the development of every team member is necessary to our success. Team members are expected to learn the most efficient way to perform their jobs in a safe manner. You will be given the proper instructions to allow you to be successful.

Consistent with the company's business requirement, team members may be trained in new skills and given the opportunity to master these skills. As each team member's personal development grows stronger, the entire NMAA team will grow stronger.

PERFORMANCE EVALUATIONS

Acceptable performance of assigned job duties is essential to the success of NMAA and the safety and well-being of all NMAA team members. Accordingly, your job performance will be evaluated periodically during your employment at NMAA. Each new employee's job performance will be informally evaluated prior to the completion of ninety consecutive calendar days of employment with the company.

Because of the value we place on our team members, it is the company's policy to provide written performance appraisals for team members at various intervals. The performance appraisal is simply a tool to communicate with team members their areas of accomplishment and to identify development opportunities. As such, performance appraisals will help team members not only in current work assignments, but also in helping them reach their ultimate career objectives.

NMAA has elected to conduct periodic performance reviews for all team members. The performance appraisal should not take the place of daily feedback and coaching between supervisor/managers and team members. Team members are strongly encouraged to talk with their supervisor/manager about performance at any time.

Initial Evaluation Period

NMAA seeks individuals who work well with others, are conscientious, and perform their jobs effectively. During the first ninety calendar days of employment, newly hired employees will be carefully evaluated to make sure they meet the criteria to become a part of the NMAA team. The supervisor/manager will make this informal evaluation to monitor the employee's progress. If the employee's service is satisfactory, he or she will then be considered an NMAA team member.

The Initial Evaluation Period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. NMAA uses this period to evaluate an employee's capabilities, work ethic, and overall performance. Either the employee or NMAA may end the employment relationship, at will, at any time during or after the Initial Evaluation Period, with or without cause or advance notice.

Performance Appraisal

We believe it is important for you to understand what the company's expectations are of your work performance; how well you are doing in relation to those expectations and finally, what you can do to improve your performance.

Supervisors and team members are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. Formal performance evaluations are conducted periodically to provide both supervisors and team members with the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, relevant approaches for meeting performance goals.

All decisions and judgments made in connection with the organization's performance appraisal system will be based on job-related factors. To ensure this, all performance measures and indicators applied to any position must be based on the requirements, responsibilities, and duties contained in the job analysis and/or job description.

NOTICE OF RESIGNATION & EXIT INTERVIEW

Should the time ever come when you are thinking of leaving NMAA, please talk it over with your supervisor or another member of management. This is an important decision, and NMAA wants to make sure that you have considered all factors. If you decide to resign, please give at least two weeks' notice. Your cooperation will help us in finding a replacement. When possible, upon departure, a member of the Human Resources Department will conduct an exit interview with you to obtain feedback on your employment experience at NMAA. We would appreciate any constructive comments you might have.

III. POLICIES AND OPERATING PROCEDURES

HEALTH AND SAFETY POLICY STATEMENT

The company Health and Safety Policy Statement has been developed to reflect and communicate the proactive safety attitude maintained at Nikkei MC Aluminum America, Inc.

“NMAA believes that the safety of our team members, visitors and customers is of utmost importance. NMAA is committed to and will comply with appropriate safety, environmental, and security laws and regulations, such as those established by OSHA, EPA, DOT, and other applicable federal, state, and local safety, health, and environmental laws and regulations.”

Our objectives are to ensure:

- The prevention of bodily injury and the safeguarding of health are the first considerations in all workplace actions and are the responsibility of every team member, at every level. Each member of our organization is responsible for health and safety and will be held accountable for their actions.
- All injuries and accidents are preventable through establishment of, and compliance with, safe work practices and procedures.
- Written work instructions describing the safe work practices and procedures shall be followed in all workplace actions, and are an essential element of the overall workplace safety program.
- We are responsible for the environment in which we operate as it relates to safety. As such, we shall be aware of our interaction with the environment by adhering to the established Environmental Management System.
- All other policies and procedures must support and comply with this policy statement.

WRITTEN SAFETY AND ENVIRONMENTAL PLANS

Because NMAA cares about its team members and strives to provide a safe and clean workplace, NMAA has put into place many written safety and environmental policies. These plans provide guidance and direction for the safety-related issues they cover. The topics covered at NMAA include, but are not limited to, the following:

Forklift	Lockout/Tagout	Confined Spaces
Personal Protective Equipment	Electrical Safety	Arc Flash
Hearing Conservation	Combustible Dust	Containers that Kill
Melting Wheels Safely	Fall Protection	Emergency Response
Emergency Evacuation	Machine Guarding	HazCom
Materials Handling/Storage	Contractor Awareness	Man-lifts
SLUG Plan	Spill Response Plan (ESRRP)	Walk/Work Surfaces
Active Shooter Policy		

**Additional information can be provided by contacting the NMAA Compliance Department.*

EMPLOYER/TEAM MEMBER RESPONSIBILITY

It is the policy of NMAA to provide a place of employment reasonably free from hazards which may cause illness, injury, or death to associates in addition to equipment or property damage. It is also NMAA policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies, and provide a safe, clean working environment. All company supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They shall ensure that:

- Their staff members are trained in appropriate safety procedures, as required.
- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition.
- They immediately notify the Human Resources Manager and Safety Coordinator and then complete a Vital Occurrence Report (VOR), if an accident, work-related injury, near-miss incident, or property damage occurs.

All team members have a responsibility to themselves and to the company for their safety and the safety of their coworkers. All team members are required to:

- Comply with all federal, state, and local laws, rules, and regulations relevant to their work.
- Observe all company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of their job duties.
- Correct and report unsafe equipment and practices.
- Report any accidents or incidents promptly to their supervisor.
- Perform routine layered safety audits of all areas.

SAFETY COMMITTEE

NMAA holds a monthly Safety Committee meeting. This meeting covers current and upcoming safety concerns and issues along with a facility tour to identify items of concern. Identified items are then discussed and summarized, distributed to managers with responsibilities assigned, and then posted on the bulletin boards.

The committee members are a mix of team members representing each department, production shifts, and the management team. Committee members serve a term of three months.

SAFETY VIOLATION PROCEDURES

The NMAA management wants to ensure the safety and health of all its team members. To accomplish this, NMAA has established guidelines to control and enforce both the company's, OSHA's, and other relevant regulations. The Compliance Department of NMAA, along with management, managers, and direct supervisors shall follow these guidelines when enforcing safety. Unwillingness to abide by the guidelines can result in disciplinary action up to and including discharge. *(See Corrective Action Program)*

It is the hope of NMAA management that all team members agree with the company's approach to safety and protecting the environment and will assist in the effort to ensure that we have the safest and best workplace possible.

SAFETY EQUIPMENT AND CLOTHING

All team members, visitors, contractors, etcetera, are required to use the appropriate Personal Protective Equipment (PPE) for the job and/or work area as defined in the NMAA PPE plan.

VISITOR AND CONTRACTOR SAFETY

NMAA is responsible for the safety of visitors and contractors while on company property. The following is a list of things that each contractor/visitor must be aware of before entering the production and storage areas:

- Signing in at the front desk upon arrival/signing out when leaving
- That they have the proper PPE before entering the plant or yard:
 - Safety glasses with side shields
 - High-visibility jacket, vest, or shirt
 - Hardhats:
 - Visitors: A yellow "Visitor" hard-hat with chinstrap is required for all visitors
 - Contractors: A hard-hat with chinstrap is required for contractors working onsite.
 - Before working onsite, contractors must be educated on, agree to, and sign both the Contractor Safety and the Contractor Environmental Awareness forms. When completed, these forms are to be forwarded to the Compliance Department.
 - Any other circumstances that may affect anyone's well-being, such as others working in the area, forklift traffic, proper waste disposal, etc.

There may be other policies that apply to a contractor job being performed, such as Lockout/Tagout or Confined Space Entry for example. It is the responsibility of the team member ordering/contracting the work to ensure that all the safety and environmental requirements are both initially and continually met by their contractor. Likewise, the team member meeting with a visitor is responsible for the safety of the visitor in the facility and that he/she wears the required PPE, as outlined previously. If any questions arise regarding any safety or environmental issues, please contact the Compliance GM or Safety Coordinator for clarification.

QUALITY MANAGEMENT SYSTEM

Nikkei MC Aluminum America, Inc. is certified to ISO (International Standards of Organization) 9001. ISO 9001 certification is based on eight quality management principles: customer focus, leadership, involvement of people, process approach, system approach to management, continual improvement, fact-based decision making, and mutually beneficial supplier relationships. In addition, ISO 9001 certification focuses on customer specific requirements.

QUALITY POLICY STATEMENT

Nikkei MC Aluminum America, Inc. is committed to meeting customer requirements and to continually improve our quality management system. NMAA will accomplish these commitments through the following:

- Provide adequate resources by:
Monitoring and maintaining staffing levels at 95% or greater
- Training for team members in positions with impact on customer satisfaction by:
Recording tracked competence level with a goal of working without supervision
- Supplier involvement by:
Monitoring ability to meet the established criteria and communicate problems
- Customer satisfaction by:
Maintaining goal of customer complaints of zero per year

ENVIRONMENTAL MANAGEMENT SYSTEM

In addition to the ISO 9001 certification, NMAA is certified and compliant with ISO 14001 EMS standards. These standards minimize adverse environmental impacts from our operations by conserving natural resources and reducing, minimizing, or eliminating the generation and release of pollutants to the environment. The goal is to continuously evaluate the environmental management system and adopt appropriate objectives and targets to improve processes.

ENVIRONMENTAL POLICY STATEMENT

Nikkei MC Aluminum America, Inc., will conduct itself in a responsible manner to ensure its continued success and profitability. As part of this overall plan, NMAA is committed to protecting the environment in which our employees work in addition to the environment of the communities in which we operate. NMAA will accomplish these commitments through the following:

1. NMAA will commit to the prevention of pollution.
2. NMAA will establish an Environmental Management System and continually improve it.

3. Recognizing that the waste of energy and raw materials is detrimental to the environment and counterproductive to our business goal of profitability, we will manage resources efficiently.
4. We will commit to operate in compliance with relevant environmental legislation, regulations, and other applicable requirements.
5. In addition, we will establish and annually review our environmental objectives.

DRUG-FREE WORKPLACE POLICY

Nikkei MC Aluminum America, Inc. has a strong commitment to a workplace free from substance abuse. The purpose of this policy is to establish guidelines addressing substance abuse and to promote a safe and healthy working environment for all team members. Maintaining an environment free from substance abuse reduces the potential for injuries, inappropriate conduct, absenteeism, and tardiness and minimizes medical costs while improving team member productivity.

This policy applies whenever a team member covered under this policy is on company property, on company time, at a company sponsored event, in a company supplied vehicle, representing the company, or in any other circumstances in which a team member's violation of the policy may reasonably be assumed to have an adverse effect on the company's operations, integrity or reputation, and/or the health and safety of its team members, suppliers, customers and the public. Team members who engage in prohibited drug/alcohol related conduct at work or on the company's premises present a hazard to themselves, other team members, and in some instances, the public. In addition to the potential safety issues and possible legal consequences of criminal conduct, prohibited drug/alcohol related conduct at work or on the company's premises can reduce productivity, damage morale, endanger the company's reputation, and contribute to increased medical costs.

Therefore, it is the policy of NMAA to prohibit the following conduct related to drugs and alcohol:

- The use, sale, possession, transfer, purchase, or manufacture of illegal drugs at any time;
- Working or being on company premises under the influence of cannabis, illegal drugs, or inappropriate use of prescribed medications. This includes, but is not limited to, otherwise permissible medications if the medication was prescribed for someone other than the team member or if the medication is being taken in a manner, combination, or quantity other than which it was prescribed;
- The use, possession or control of any drug paraphernalia pertaining to illegal drugs;
- Testing positive for illegal drugs or a controlled substance;
- The use, possession, transfer, offer, purchase, procurement, sale, or attempted sale of any alcoholic beverage, or being under the influence of any alcoholic beverage, during work time or company premises;
- Consuming any alcoholic beverage on company time or company premises, including breaks, lunch periods, or in vehicles owned, leased, or issued by the company;

- Reporting for work or working at NMAA with an unacceptable level of alcohol in the team member's system. Team members whose test results show an alcohol concentration of at least .08% will be discharged. An alcohol concentration of less than .08%, but greater than .02%, shall constitute evidence of intoxication along with other evidence of job impairment;
- Engaging in conduct following consumption of alcohol at company-sponsored event or company business related activity that endangers the team member or others or endangers NMAA's reputation;
- The possession or control of open alcoholic beverage containers (cans, bottles, etc.) for any reason while on the company premises, in vehicles owned, leased, or issued by the company or while engaged in company activities, except as noted below for company sponsored events; and
- The possession of closed alcoholic beverage containers (cans, bottles, etc.) for any reason while on company premises or while engaged in company activities, except as noted below for company sponsored events.

Prescription Drugs

Team Members using a prescription drug, or cannabis that may impair mental or motor functions and affect the team member's ability to safely perform his or her job duties must report the use of that prescription drug to the Human Resources Manager before reporting to work after its use. For the safety of all team members, NMAA may place persons using such prescription drugs in a less hazardous job assignment, provided such assignment is available, or place them on a temporary medical leave of absence until released as fit for duty by the prescribing physician.

NMAA reserves the right to have a physician of its choosing determine whether a prescription drug could produce hazardous effects.

Social or Business Events and/or Other Entertainment

Moderate consumption of alcoholic beverages at business events and/or relating to business entertainment sponsored or authorized by NMAA will constitute the only exception to the rules prohibiting the consumption of alcohol. The company expects team members to always conduct themselves responsibly and in a professional business manner on such occasions.

Alcohol & Drug Related Convictions

A team member must report any convictions for drug or alcohol related offenses to his or her supervisor within five calendar days following the conviction. The circumstances surrounding any drug or alcohol related conviction will be reviewed to determine if any violation of this policy has occurred.

Testing Occasions

It is the intent of NMAA to conduct drug/alcohol testing utilizing methods and procedures that ensure accuracy, privacy and personal dignity while maintaining the integrity of the process. All procedures will be conducted in compliance with local, state, and federal laws.

A team member will be required, as a condition of employment, to submit to drug/alcohol testing under the following circumstances insofar as permitted by local, state, and federal laws and regulations.

- **Reasonable Suspicion:** When facts or circumstances exist, which are enough to cause a reasonable suspicion that a team member is using or has used drugs or alcohol in a violation of this policy, such as
 - i. Specific observations concerning the appearance, behavior, speech, or body odors of the team member, including observation of drug use, drug possession or possession of drug paraphernalia, physical signs, or symptoms of being under the influence of a drug or alcohol, and signs and symptoms of chronic and/or withdrawal effects of drugs;
 - ii. A pattern of abnormal or erratic behavior as evidenced by the team member's work time actions, appearance, or conduct;
 - iii. Arrest or conviction for a drug-related offense; or
 - iv. Having an on-the-job accident involving injury and/or property damage.
- **Random:** All team members may be subject to random testing, including the management team. An outside vendor will select team members for random testing.
- **Post-Accident/Incident Testing:** Drug and/or alcohol testing of a team member will be required after all accidents involving injury or estimated property damage more than \$500. Post-accident drug, alcohol, and cannabis testing designed to accurately identify impairment caused by substance abuse will be performed only upon reasonable suspicion that drug, alcohol, or cannabis use contributed to the accident unless otherwise required by applicable law.
- **Applicant:** Applicants are required, as a condition of employment, to submit to drug/alcohol testing. An applicant who refuses to submit to the required tests or tests positive shall not be eligible for employment.

If a team member refuses testing for reasonable suspicion, post-accident, or random drug testing, he/she will be suspended pending termination and his/her refusal to be tested will be taken into consideration during the investigation. If the team member refuses to be tested for reasonable suspicion, he/she will be offered transportation assistance to their home residence for safety reasons. If the team member still refuses transportation, he/she will be asked to sign a "Refusal of Transportation" form, and the proper authorities will be contacted. The team member will be suspended until further notice and is not to report to work until notified by the Human Resources Department.

Under certain circumstances, team members may be permitted to drive themselves to a collection site. The team member will be allocated a reasonable amount of time to arrive at the testing site. If the allotted time is exceeded, it will be considered a refusal to test with the same consequences as a positive test result.

Testing Methods

An outside vendor will conduct drug/alcohol testing. Some testing methods include, but are not limited to, hair analysis, breath analysis, and urine analysis.

Medical Review Officer (MRO)

If the result of an initial drug/alcohol test is positive for the presence of illegal drugs or alcohol, the laboratory will conduct a confirmation test to substantiate the result of the prior test. No team member or applicant will be subject to discipline, discharge, or adverse hiring decisions based on a positive test result from an initial test that has not been verified

by a confirmation test on the same sample. However, the company may suspend a team member or may delay hiring an applicant after obtaining positive results of an initial drug/alcohol test.

Once an initial sample has been verified as a positive test, under no circumstances will a new specimen/sample be collected. If a drug test result is reported as "positive-dilute specimen," it is considered valid and company policy regarding a positive test result will be followed. If the test result is "negative-dilute specimen," a new sample will be collected. A second negative-dilute result will be treated in the same manner as a positive test.

A team member who tests positive for illegal drugs and/or alcohol as indicated above will not return to work pending a review of the test by a Medical Review Officer (MRO) or equivalent. A Medical Review Officer is a licensed physician trained and certified to properly interpret and evaluate substance abuse testing results. The MRO's primary responsibility is to review and assess test results to determine whether some medical reason exists for a positive test result. The team member or applicant may discuss with the MRO possible explanations for any positive test result, including any relevant medications.

Prior to testing, an applicant or team member who is subject to testing must sign an approved consent form for testing and a form allowing the release of the testing results to the Human Resources Department and independent reviewing agents.

Duty to Cooperate

A team member is required to cooperate in the administration of this policy as a condition of continued employment. Failing to cooperate includes, by the way of example, the following:

- Refusing to consent to testing as requested;
- Refusing to submit a sample as requested;
- Tampering with or intentionally causing a false or invalid reading of a test;
- Refusing to sign required authorization consent forms;
- Refusing to cooperate fully in any review or investigation;
- Engaging in any form of untruthfulness, misrepresentation, making any misleading statements or omissions, or encouraging others to engage in any such untruthfulness or similar behavior.

Corrective Action

Violation of this policy, including but not limited to the failure to cooperate in the administration of this policy, may result in corrective action, up to and including immediate termination and, for an applicant, the withdrawal of a conditional offer of employment.

Confidentiality

All actions taken with respect to this policy will be kept confidential in accordance with applicable laws. This confidentiality provision does not preclude the company from taking appropriate actions.

Policy Amendments

NMAA reserves the right to modify or terminate this policy at any time in its sole discretion.

EMPLOYEE TREATMENT PROGRAM (Self-Disclosure):

Chemical dependency is an illness that can be treated and controlled through abstinence. If a team member comes forward on their own accord and voluntarily requests assistance for a substance abuse problem **prior to** a mandatory testing for reasonable suspicion, post-accident/incident or random drug and/or alcohol testing, they will be given the opportunity to seek professional assistance through the Employee Assistance Program (EAP).

NEPOTISM POLICY

Nepotism is the practice of favoring relatives because of their relationship rather than because of their abilities; favoritism or patronage granted to relatives in business (e.g., appointment to a job). It is the policy of NMAA that no “relatives” are permitted to improperly influence the hiring, work responsibilities, work schedule, salary, career progress, benefits, termination or other terms and conditions of employment of related team members.

The employment of relatives can cause various problems, including but not limited to, charges of favoritism, conflicts of interest, family discord and scheduling conflicts that may work to the disadvantage of both NMAA and its team members.

For this policy, “relative” shall include the following relationships: relationships established by blood, marriage, or legal action. The term also includes domestic partners (a person with whom the team member’s life is interdependent and who shares a common residence) and any relatives of a team member’s domestic partner.

It is NMAA’s goal to avoid creating or maintaining circumstances in which the possibility or appearance of favoritism, conflicts or management disruptions exist. NMAA may allow existing personal relationships to be maintained or employ individuals with personal relationships with current team members under the following circumstances:

- They may not create a supervisor/subordinate relationship with a family member;
- They may not supervise or evaluate a family member;
- The relationship will not create an adverse impact on work productivity or performance;
- The relationship may not create an actual or perceived conflict of interest;
- They may not audit or review, in any manner, the individual’s work;
- They may not be employed if they have a relative in an executive position with a span of control over the entire site or entity.

Related team members will be permitted to work in the same department or for the same manager provided no implicit or explicit reporting relationship exists. Under no circumstances may one related team member supervise, directly or indirectly, another related team member.

No personal team member relationship covered by this policy will be allowed to be maintained, regardless of the positions involved, if it creates a disruption or potential disruption in the work environment, creates an actual or perceived conflict of interest or is prohibited by any legal or regulatory mandate.

Should relationships addressed within this policy be identified with either employment candidates or current team members, the matter should be immediately reported to the Human Resources Department and the following procedures will be followed:

- A determination will be made whether the relationship is subject to the company's Nepotism Policy, based on the conditions described above.
- If the relationship is determined to fall within one or more of the conditions described in this policy, the Human Resources Manager, in consultation with the affected team member(s) and the company's management team, will attempt to resolve the situation through the transfer of one team member to a new position or some other action which will correct the conflict or issue.

This policy must be considered when hiring, promoting, or transferring any team member. NMAA reserves the right to exercise appropriate managerial judgment to take such actions as may be necessary to achieve the intent of this policy. The company reserves the right to vary from the guidelines outlined in this policy to address unusual circumstances on a case-by-case basis.

It is the responsibility of every team member to identify to the Human Resources Department any potential or existing relationship which falls under the definitions provided in this policy. Team members who fail to disclose personal relationships, covered by this policy, will be subject to disciplinary action, up to and including the termination of employment.

ANTI-DISCRIMINATION/HARASSMENT PREVENTION POLICY

Nikkei MC Aluminum America, Inc. is committed to providing a work environment free from harassment and inappropriate behavior based on a legally protected status. Any form of unlawful discrimination or inappropriate behavior, including harassment based on race, color, religion, sex, national origin, ancestry, age, veteran status, disability, sexual orientation, gender identity, genetic information, military status, citizenship status, or any other category protected by applicable law, is strictly prohibited. NMAA will not tolerate, condone, or allow any harassment, inappropriate behavior, or discrimination whether verbal, physical or environmental. Any team member found to have engaged in any form of harassment or inappropriate behavior during his/her employment will be subject to appropriate disciplinary action, up to and including termination of employment.

Nikkei MC Aluminum America, Inc. recognizes that it may be difficult to define what constitutes harassment under the law. Inappropriate behavior or harassment includes, but is not limited to, verbal, physical, and visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with work performance.

SEXUAL HARASSMENT OR INAPPROPRIATE BEHAVIOR OF A SEXUAL NATURE

Sexual harassment or inappropriate behavior of a sexual nature includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, as well as other conduct of a sexual nature when: (a) submission to such conduct is made an explicit or implicit term or condition of an individual's employment; (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals; or (c) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of what may constitute inappropriate behavior or, if unwelcome and severe or pervasive, may constitute sexual harassment, besides sexual advances and requests for sexual favors include, but are not limited to:

- Sexually suggestive physical contact or behavior, such as grabbing, groping, kissing, fondling, rubbing, or massaging someone's neck or shoulders, stroking someone's hair; unwelcome leering, whistling, pinching, brushing against the body; suggestive, insulting, or obscene comments or gestures;
- The display in the workplace of sexually suggestive or explicit objects, pictures, posters, or cartoons, including, but not limited to, offensive electronic communications or voicemail messages; access to pornographic images through the Internet or email.
- Verbal abuse of a sexual nature including inappropriate or obscene language, lewd, off-color, sexually oriented comments or sexual jokes or any graphic verbal commentary about an individual's body.

OTHER HARASSMENT OR INAPPROPRIATE BEHAVIOR

Any conduct based on a person's race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, genetic information, military status, citizenship status, or any other characteristic protected by local, state, or federal law is considered harassing or inappropriate if it creates a hostile, intimidating or offensive work environment, or unreasonably interferes with a team member's work performance.

As with sexual harassment, other harassment or inappropriate behavior can be verbal, non-verbal or physical. Examples of what may constitute inappropriate behavior or, if unwelcome and severe or pervasive, may constitute other harassment include, but are not limited to, the use of racial or ethnic slurs, jokes, or derogatory remarks; the use of insults, threats, literature, pictures or cartoons based on a protected characteristic; or any physical aggression based on a protected characteristic.

This policy applies to all work-related activities and conduct whether it involves fellow team members, supervisors, or outside clients or contractors who conduct business with NMAA. Furthermore, it prohibits harassment and inappropriate behavior in any form, including verbal, physical, and visual harassment.

REPORTING HARASSMENT OR INAPPROPRIATE BEHAVIOR

Any team member who believes that harassment or inappropriate behavior has occurred should immediately report the incident to Human Resources. The company takes matters of harassment or inappropriate behavior very seriously and will conduct a prompt investigation of all complaints and take appropriate action based upon that investigation. Any team member found to have engaged in any form of harassment or inappropriate behavior will be subject to appropriate disciplinary action, up to and including termination of employment. Absolute confidentiality cannot be guaranteed. However, every effort will be made to manage all complaints and investigations with as much discretion and confidentiality as circumstances permit. The company will not tolerate any retaliation against any team member for making a complaint, bringing inappropriate conduct to the company's attention, or for participating in an investigation of an alleged act of harassment or inappropriate behavior.

VIOLENCE PREVENTION POLICY

NMAA is committed to preventing workplace violence and to maintaining a safe work environment. NMAA has adopted the following guidelines to deal with intimidation, harassment or other threats or acts of violence that may occur on the job.

For this policy, "on the job" means on NMAA property, on the parking lots, on the street in front of or surrounding the facility, or in the immediate vicinity of our facilities. It also means away from the premises if the individual is on business or acting on a business-related matter.

All coworkers, customers, vendors, and others with whom we interact, should be treated with courtesy and respect. Team members are expected to refrain from engaging in intense arguments, fighting, "horseplay," or other conduct that may be dangerous to others. NMAA will not tolerate any conduct that threatens, intimidates, or coerces another team member, a customer, vendor, visitor, or another member of the public.

All threats or acts of violence, both direct and indirect, should be reported as soon as possible to your supervisor, Human Resources, or any member of management. This includes threats by team members as well as threats by customers, vendors, visitors, or other members of the public. When reporting a threat of violence, you should be as specific and detailed as possible.

All suspicious individuals or activities must be reported to your supervisor, general manager, and/or member of management as soon as possible. Do not place yourself in peril. If you see or hear a commotion or disturbance near your work area, do not try to intercede.

NMAA will investigate all threats or acts of violence and suspicious individuals or activities. To maintain workplace safety and the integrity of its investigations, NMAA may suspend team members, either with or without pay, pending investigation. The complaint and ultimate resolution will be kept as confidential as possible, under the circumstances.

Anyone determined to be responsible for threats or acts of violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action, up to and including termination of employment. Any criminal acts will be prosecuted to the full extent of the law.

NMAA encourages team members to bring their disputes or differences with other team members to the attention of management before the situation escalates into potential violence. NMAA is eager to assist in the resolution of disputes involving team members and will not discipline or retaliate against team members for raising such concerns unless the complaint was clearly brought in bad faith.

GENERAL RULES OF CONDUCT

To ensure proper understanding of basic conduct expected of NMAA team members and to maintain efficient operations, certain rules and guidelines are helpful.

Failure to observe the following list of rules and guidelines may result in corrective action, which may include immediate termination (*see Corrective Action Program*). This list is not meant to cover every situation, and NMAA reserves the right to take appropriate corrective action for any unacceptable team member actions or work conduct, including immediate termination of employment without advanced notice consistent with the employment-at-will relationship.

Unacceptable behavior includes, but is not limited to, the following:

- Threats, fighting or any act of violence on company premises or at any company sponsored activity
- Theft from the company, fellow team member, visitor, or customer
- Use, possession, sale, or influence of drugs, narcotics, or alcohol on the job or on company property or refusal to submit to drug and alcohol testing
- Misrepresentation or falsification of information concerning employment or any other company records
- Possession of firearms or any dangerous weapons or materials inside the facility.
- Engaging in unsafe work practices that present a risk to your health and safety or that of a fellow team member, visitor, or customer
- Engaging in horseplay, boisterous or disruptive behavior, or otherwise distracting others from their work
- Insubordination to the supervisor, general manager, or management of the company
- Gainful employment with another company while on any approved leave of absence
- Excessive or unauthorized absenteeism or repeated tardiness.
- Failure to observe all company safety rules
- Failure to perform your assigned work to established standards; incompetence or inefficiency; poor or careless work
- Wasting time, loitering, or sleeping on the job
- Smoking or use of tobacco products in unauthorized areas

- Inappropriate behavior or harassment of fellow team members, visitors, or customers
- Unauthorized use of company telephones, mail systems, computers, copiers or other company services or equipment
- Disclosure of business secrets or confidential or proprietary information to unauthorized people or making use of this information for personal benefit or gain or in a manner that harms the company
- Performing personal work during work hours
- Defacing bulletin board or any other company property
- Failure to swipe timecards as instructed, swiping timecards for other team members or having another team member swipe your timecard
- Leaving company premises or regularly assigned work area during working hours without permission of your supervisor, or member of management
- Abusing, misusing, destroying, damaging, or defacing company property, tools, equipment, or the property of others on company premises
- Unauthorized delay, restriction of production or inciting others to delay or restrict production
- Failure to report to work upon expiration of vacation or leave of absence or when called back after layoff
- Unauthorized access to company materials or areas
- Gross misconduct

NON-RETALIATION POLICY

NON-RETALIATION AND NON-RETRIBUTION FOR REPORTING

NMAA is committed to maintaining a culture that promotes the prevention, detection, and resolution of instances of conduct that do not conform to law, regulation, policies, and procedures. We understand that team members may not report concerns if they feel they will be subject to retaliation or retribution or harassment for reporting the concern. Therefore, a non-retaliation/non-retribution policy was established to reassure team members who wish to report concerns or policy violations.

Supervisors, managers, or team members are not permitted to engage in retaliation, retribution or any form of harassment directed against an individual who reports a compliance concern or cooperates in an investigation of any complaint under this policy. Anyone who engages in any act of retaliation or retribution against a team member that has reported suspected misconduct in good faith will be subject to disciplinary action up to and including termination.

Team members should report concerns under this policy to their supervisor or Human Resources.

WHISTLEBLOWER POLICY

The company has adopted a Code of Business Ethics (“Code”) which applies to all team members and others who act on behalf of our company. The Code requires that we act in accordance with high ethical standards, be familiar with and comply with the laws and regulations which govern our business and strive for fairness in our dealings and relationships.

Reporting Responsibility

It is the responsibility of all team members to understand and comply with the Code and to report violations or suspected violations of the Code.

Reporting Procedures

Team members are required to report violations of the Code to their supervisor/manager or the Human Resources Department. In addition, and in accordance with this Whistleblower Policy, any team member may also report a suspected violation of this Code to the company President and/or Vice President.

Non-Retaliation

No team member who, in good faith, reports a violation or suspected violation of the Code shall suffer any career disadvantage, retaliation or adverse employment consequences. Any team member who retaliates against someone who has reported a violation or suspected violation, in good faith, is subject to disciplinary action up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable team members and others to raise serious concerns with the company prior to seeking resolution outside the company.

Good Faith Reporting

Anyone who reports a violation or suspected violation of the Code must do so in good faith and have reasonable grounds for believing the conduct reported is a violation of the Code. Making allegations that prove to have been made without reasonable grounds, or which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and the company will take appropriate disciplinary action, up to and including termination.

Confidentiality

The identity of team members reporting violations will be kept confidential unless the company is required to reveal it in order to investigate the reported violation or enforce this Code or by applicable law or judicial process.

Handling of Reported Violations

The company will investigate reports of actual or suspected violations of the Code. In doing so, it will respect the rights of all parties concerned.

Action in the Event of a Violation

If a violation is found, the company will take appropriate disciplinary action, up to and including termination and filing of criminal charges.

CODE OF BUSINESS ETHICS

OUR COMMITMENT

This Code of Ethics is to reaffirm our commitment to integrity as the cornerstone of the behavior of team members and all others who act on our behalf. Each of us is responsible for acting in accordance with high ethical standards. Our ethical standards are based on respect for the dignity of each individual and a commitment to honesty and fairness. Our obligation to operate within the law is just the beginning of our ethical commitment. We must always strive for fairness in our dealings and relationships.

The guidelines contained in this policy are to assist you in making the right choices when confronted with a difficult situation. By following these guidelines, you will help ensure that we conduct our business for the benefit of all our stakeholders – that is, our customers, shareholders, suppliers, communities, and fellow team members. However, these guidelines do not cover every situation and guidelines have exceptions. You should get help from your manager, or other company resources, such as the Human Resources Department, whenever you are in doubt as to the proper course of action.

The willingness of each of us to raise ethical concerns is essential. No one will suffer any adverse effects to their job or career because of raising an ethical concern or questioning company practice. Individuals in management positions have a special responsibility to demonstrate and model high ethical standards in their behavior and to create an environment that supports ethical behavior, an environment where questionable practices are challenged.

Our success is dependent on each of us being able to properly apply these ethical standards to our own behavior. Ultimately, the responsibility for ethical behavior rests with you in the exercise of your independent judgment.

A STATEMENT OF OUR ETHICAL PRINCIPALS

- We will deal fairly and honestly with those who are impacted by our actions and treat them as we would expect them to treat us if the situation were reversed.
- We will respect the dignity of everyone.
- We will not pursue any business activities that will not withstand public ethical scrutiny.
- We will disclose any conflict of interest we may have regarding our responsibilities to the company and remove the conflict where required.
- We will promote relationships based on mutual trust and respect and provide an environment where individuals may question company practices without suffering a career disadvantage.

CONDUCTING THE COMPANY'S BUSINESS

In conducting the business of the company, you will be dealing with a variety of people and organizations including customers, suppliers, and competitors as well as community representatives and other team members.

- All our relationships should be based on honesty and fairness.
- We want long-term, mutually beneficial, business relationships and trustworthiness are essential to establish and keep them.
- Be truthful in your representation of the company.
- If there is a mistake or misunderstanding, correct it immediately.

DEALING WITH CUSTOMERS

Serving customers is the focal point of our business. Satisfying customers is the best way to ensure business success.

- We must work with customers to understand and anticipate their needs and identify and remove obstacles customers may see in doing business with us.
- We need to respond promptly and courteously to customer inquiries and requests.
- We must accurately represent our product and services in our marketing, advertising, and sales efforts.
- We must provide products and services of the highest quality.
- We need to understand what represents "highest quality" in the eyes of the customer.
- We must regularly measure customer satisfaction and continuously improve our quality.

DEALING WITH SUPPLIERS

Prospective suppliers will have a chance to compete fairly for our business.

- We will select suppliers who provide the highest quality at the lowest total cost.
- We will not suggest to any supplier that we will not buy from them unless they purchase from us.

DEALING WITH GOVERNMENT AND BANK EMPLOYEES

You should be aware of and comply with the following when dealing with any government or bank employee:

- The Federal Bank Bribery Statute prohibits giving anything of value to bank employees relating to any transaction or business with the bank where they are employed.
- The United States Government prohibits you from providing any meals, gratuities, or entertainment to its employees. The U. S. Government and other governments have ethics codes strictly regulating what is permitted in gifts, meals, and entertainment.

- You should be aware that there may also be rules in effect by state, local and/or foreign governments governing the acceptance of business courtesies such as meals and refreshments which you must observe. Normal business courtesies in the commercial marketplace can be construed as an attempt to improperly influence someone in the government marketplace and may be construed as a bribe, kickback, or illegal gratuity.
- You should not provide any meals, entertainment, or other amenities to any government employee without first reviewing with management.

GIFTS, MEALS, AND ENTERTAINMENT

Except when dealing with government representatives, you may receive or give customary business amenities such as meals, provided they are associated with a business purpose, reasonable in cost, appropriate as to time and place and are such as not to influence or give the appearance of influencing the recipient. Business-related gifts and excessive entertainment are inherently compromising and do not belong in our business relationships.

- Do not give or receive gifts, meals, or entertainment unless they are of limited value, do not influence or give the appearance of influencing the recipient and cannot be viewed as a bribe, kickback, or payoff.
- Do not give or receive gifts, meals, or entertainment unless they do not violate any law or generally accepted ethical standards including the standards of the recipient's organization.
- Do not give or receive gifts, meals, or entertainment unless they can withstand public ethical review.
- Under no circumstances may a gift of money be given or received.
- You are to courteously decline or return any kind of gift, favor, or offer of excessive entertainment which violates these guidelines and inform the individual making the offer of our policy.

IMPROPER PAYMENTS

We will not directly or indirectly offer or solicit any kind of payment or contributions for the purpose of:

- Influencing customers, suppliers, or governmental entities including their officials or employees.
- Obtaining, giving, or keeping business.
- Persuading any officials or employees of another company to fail to perform, or to improperly perform their duties.
- Influence legislation or regulations.

DISPARAGEMENT

No one should ever make false, misleading, or disparaging remarks about individuals or organizations or their products and services. Do not disparage our competitors or their products or employees. We should sell our products and services on their merits. If you make comparisons between our products and those of a competitor, they should be accurate and factual.

ACCURATE RECORDS AND REPORTING

Company records must reflect an accurate and verifiable record of all transactions. Information you record and submit to another party, whether inside or outside the company, must be accurate, timely, and complete. It should honestly reflect the transaction or material. Reports or records should not be used to mislead those who receive them, or to conceal anything that is improper.

POLITICAL CONTRIBUTIONS

- Company resources shall not be used to support political parties or candidates
- Individual team members are encouraged to support their own parties and candidates, but they must do so on their own time and not use company resources.
- If a planned contribution could in any way be looked upon as involving company funds, property, or services, legal consultation should be sought.

CONSULTANTS

Consultants and agents retained by the company are expected to adhere to our Code of Ethics during their work on behalf of the company.

- Special care should be taken to ensure no conflict of interest exists, that the consultant is genuinely qualified and in the business for which retained, that the compensation is reasonable for the services being performed, and that there is a written agreement outlining the statement of work and under which the consultant agrees to abide with all applicable laws and report any conflicts of interest.
- Consultants and agents may not be retained to do anything illegal or improper. What you may not do directly, you may not do indirectly by acting through another party.

LEGAL COMPLIANCE

You must become familiar with and comply with the laws and regulations which govern your area of responsibility. If you have responsibility involving the application of a particular law, you should consult with and be guided by the advice of the company's legal consultant. Decisions regarding the applications of various laws should not be made without that advice. You are not authorized to take any action which our legal consultant has advised would constitute a violation of the law.

- It is the company's intent to conduct its business in a way that not only conforms to the letter of the law, but also promotes the spirit of fairness and honesty behind the laws.

ANTITRUST LAWS

The antitrust laws are intended to preserve competition by prohibiting actions that could unreasonably restrain the functioning of a free and competitive marketplace.

- Any agreement that could limit competition in a specific market may be a violation of these laws and must be reviewed by the company's legal consultant.
- Because, under certain circumstances, verbal exchanges can be viewed as an agreement, you need to exercise caution whenever you meet with competitors.

Keep your discussions to the business purpose of the meeting. Avoid discussions with competitors related to market share, projected sales for any specific product or service, revenues and expenses, production schedules, inventories, unannounced products and services, pricing strategies, marketing, and, of course, proprietary company information.

These guidelines also apply to informal contacts you may have with competitors, including those at trade shows or meetings of professional organizations.

The following are potential violations of these laws which should be brought to the attention of the company President and/or Vice President as soon as you become aware of any such situation involving the company:

- Agreements between competitors to:
 - Agree on prices
 - Allocate markets or customers
 - Limit production on quality
 - Boycott suppliers
- Agreements with customers to:
 - Control resale prices
 - Require tie-in sales (require purchase of one product as a condition of selling another product)
 - Engage in reciprocal dealing (require purchase of one product as a condition of purchasing another product)
 - Restrict their marketing territory

EXPORT REGULATIONS

Many types of commercial data, products, software and associated technical data may not be exported without prior written approval from the U.S. Government. Sales of products to certain types of customers, such as foreign military or defense agencies might also require prior written approval of the U.S. Government. We are required to ensure that items delivered overseas are not diverted to restricted countries. All exports must be made in accordance with the requirements set forth in this manual.

In addition, conversations of a technical nature with a citizen of another country may be considered an export, even when the foreign citizen is in the United States. When foreign visitors tour our facilities, what they see can be considered an export. If you have any doubt about a pending situation, you should consult the company President and/or Vice President or our legal consultant.

IMPORT REGULATIONS

Merchandise that is imported into the United States is subject to various laws and regulations which are enforced by U.S. Customs. There are substantial penalties for failure to comply with these laws and regulations. The Customs Modernization Act ("Mod Act") imposes legal obligations on all importers to exercise "reasonable care" in the classification and entry of imported merchandise, as well as various record keeping requirements relating to each entry. Under no circumstances are you permitted to submit any document to U.S. Customs that you know, or have any reason to believe, is incorrect or inaccurate in any way, or to dispose of any records relating to any entry less than five years after date of the entry.

All transactions with foreign suppliers must be conducted on a strictly arm's length basis. In the event of transactions with a related foreign seller, our relationship with the seller may not under any circumstances be allowed to influence pricing.

If you have any questions concerning classification of imported goods, record keeping requirements, and specific entry, or if you determine that documents you previously submitted to U.S. Customs are incorrect or inaccurate in any way, you should consult with our legal representative as soon as possible.

SOFTWARE

One form of intellectual property we acquire is computer software. In addition to being copyrighted and subject to export restrictions, computer software programs are usually subject to license agreements. These agreements restrict your lawful use of the software. For example, a license may prohibit copying of the programs and restrict its use to a specified computer. You should not copy software or use it on a different computer unless the license agreement permits such copying or use. Illegal duplication of software may constitute a criminal offense that is subject to severe penalties. Any authorized copies shall contain the proper copyright and other required notices of the vendor. You should read and understand the software agreements governing the software you use and obtain assistance to understand the limitations on the use of copying of the software.

We have adopted and subscribe to the "Software Code of Ethics" that has been promulgated by the Business Software Alliance, which states as follows:

- Unauthorized duplication of copyrighted computer software violates the law and is contrary to our organization's standards of conduct. We disapprove of such copying and recognize the following principles as a basis for preventing its occurrence.
 - We will neither engage in nor tolerate the making or use of unauthorized software copies under any circumstances.
 - We will provide legally acquired software to meet all legitimate software needs in a timely fashion and in sufficient quantities for all our computers.
 - We will comply with all license or purchase terms regulating the use of any software we acquire or use.
 - We will enforce strong internal controls to prevent the making or using of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violation of these standards.

If you have any questions about whether the software on your computer complies, please contact the company IT representative.

INDUSTRIAL ESPIONAGE

The Economic Espionage Act makes it a federal crime to steal a trade secret, or to copy, buy or receive a trade secret without the authorization of its owner. In addition, certain states have also enacted laws that make it a crime to steal confidential information or trade secrets. These laws impose severe penalties for any person or company that is convicted of a violation. Accordingly, you may not engage in industrial espionage or acquire information about other companies through any improper means or steal or misuse the intellectual property of any supplier, customer, business partner, or competitor.

We regularly acquire information about other companies in conducting our business. This is acceptable when this information is properly acquired. Proper sources would include information which is published or in the public domain or is lawfully received from the owner or an authorized third party.

- You may not receive information from a third party that was illegally or improperly acquired by the third party.
- You may not receive confidential information or trade secrets of a company from present or former employees who are unauthorized to disclose it.
- If you are offered proprietary information under suspicious circumstances, you should immediately consult our legal representative.
- If you come into possession of information from another company that is marked confidential, or that you believe is confidential, you should consult our legal representative if you have questions regarding the proper authorization of your possession.

- If our possession is improper, our legal consultant will return the information to the proper owner.

CONFIDENTIAL INFORMATION PROPERTY RECEIVED

We regularly receive confidential information from those we conduct business with. When we receive such information, it should be received under the terms of a written agreement that spells out our obligations for the use and protection of the information. These agreements should be reviewed by our legal consultant. You must protect the confidentiality of any such information and limit your use of it to what is authorized by the agreement. You are also responsible to see that those who are not authorized do not have access to confidential information.

KICKBACKS

The Federal Anti-Kickback Act forbids prime and subcontractors to offer, solicit, provide, or accept any gift money or other things of value for improperly obtaining or rewarding favorable treatment relating to U.S. Government prime contracts and subcontracts. The law also requires us to report violations to the government where we have reasonable grounds to suspect a violation exists. You should immediately contact our legal consultant if you have any questions regarding this law, or reason to believe that a violation exists.

FOREIGN CORRUPT PRACTICES ACT

The Foreign Corrupt Practices Act makes it a federal crime to bribe any official of a foreign government or to make inaccurate or misleading entries on the company's books for any purpose. The law imposes substantial penalties for a violation of this Act.

- You may not make direct payments to foreign officials.
- You may not make political contributions in countries where corporate contributions are illegal.
- You may not make false entries in the company's books and records.
- You may not create any fund which is not accurately recorded on the company's books.

All transactions will be conducted in strict compliance with applicable local law.

If you have any questions regarding the propriety of making any payment, contact our legal consultant before doing so.

UNAUTHORIZED USE OF COMPANY PROPERTY OR SERVICES

You may not use company property and services for the personal benefit of yourself or someone else unless the use has been properly approved for general team member use or for a specified purpose.

SAFEGUARDING COMPANY ASSETS

Each of us is responsible for protecting company assets, which include NMAA's investment in trade secrets, technology, and other proprietary information as well as physical property. Managers are responsible for setting up and keeping good controls to protect assets from loss or unauthorized use.

Each of us is responsible for assisting in preventing waste and theft and assuring the integrity of the controls.

OTHER COMPANY POLICIES

You are expected to follow and comply with all company policies and procedures. If you have any questions about any company policy, please contact your manager, the Human Resources Department, or our legal consultant.

ASSISTANCE AND COMPLIANCE

We all share responsibility to protect the company's reputation. It takes courage to raise an ethical issue – especially if it involves a situation in your work area. However, the company will support you in fulfilling your responsibility. The best course of action when you have an ethical problem is to discuss it with someone. You should consult your manager, the Human Resources Department, the legal consultant, or any other appropriate individual in the company when you need assistance. Anyone contacted with a request for assistance shall take every practical and reasonable measure to ensure that the employee's relationship with NMAA shall not be adversely affected because of the request.

EXCEPTIONS

No set of guidelines can cover all the situations you will encounter, and guidelines have exceptions. If you encounter a situation where the application of the guidelines contained in this policy seems inappropriate, consult with your manager. Your manager can discuss the situation with the appropriate approval authority to determine if an exception is in order. In case of doubt as to approval authority, the legal representative should be consulted.

COMPLIANCE AND DISCIPLINE

You are responsible for understanding and complying with this Code of Ethics. Your manager is responsible for assisting you in understanding the policy and being aware of the ethical quality of your business behavior.

- You have a responsibility to report any suspected violations of this policy to your supervisor, the Human Resources Department, or our legal consultant.
- No team member will suffer any adverse action or career disadvantage for questioning a company practice or reporting a suspected violation of this policy or other irregularity.
- The company will investigate potential violations. In doing so, it will respect the rights of all parties concerned.
- The identity of team members reporting potential violations will be kept confidential unless the company is required to reveal it to enforce this policy or by applicable law or judicial process.
- If a violation is found, the company will take appropriate disciplinary action, up to and including termination and filing of criminal charges.

INDIVIDUAL JUDGEMENT

These guidelines are provided to help each of us better understand what we believe to be in the best interest of our team members, shareholders, those with whom we do business, and the public at large. Ultimately, you are left to depend on your own individual judgment in deciding on the correct course of action.

As you consider a situation, reviewing the following factors may help you arrive at a satisfactory answer:

- Is my action consistent with approved company practices?
- Does my action give the appearance of impropriety?
- Will the action bring discredit to a team member or the company, if disclosed?
- Can I defend my action to my supervisor, other team members, and the public?
- Does my action meet my personal code of behavior?
- Does my action conform to the spirit of this Code of Ethics?

CONFIDENTIAL INFORMATION

NMAA and its affiliated corporations have accumulated considerable information that would be of substantial value to our competitors or associated industries and which NMAA goes to considerable effort to protect. This information includes, for example: experimental data, inventions, discoveries, developments and improvements, designs and processes, methods and systems, product costs, customer lists, patents, licenses, types and kinds of material and component parts used, cost of materials and components, engineering and design standards and qualifications, certification, manufacturing and testing procedures, methods of estimating costs and setting process, cost and pricing information, business negotiations and strategies, and special projects.

To maintain our competitive position, such confidential company information is to be shared only with team members who have a legitimate "need to know." All team members, even those who do not sign a specific agreement containing a confidentiality provision, are required to safeguard this information both during and after employment with NMAA. Any team member who is unclear as to who has access to a given item of information or whether information is confidential or constitutes a trade secret should check with the company President and/or Vice President, prior to disclosing the information.

To protect the company's confidential/proprietary property and business information, team members may not use "still" cameras, video cameras, or similar visual recording devices (including cell phones, smart phones, or other personal electronic devices equipped with a camera feature) in work areas to record confidential/proprietary company property, business information, trade secrets, or other non-public information regarding manufacturing methods, new product designs, research data, and the development of systems, processes, products or services, know-how, and technology.

Team members may make such recordings in work areas only for business purposes and when using a company-owned device.

Team members who improperly use or disclose trade secrets or confidential information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information.

Former team members have a continuing obligation to refrain from disclosing confidential information. This means that upon separation from employment, team members must return any confidential material to NMAA and must continue to refrain from disclosing confidential information.

MEDIA COMMUNICATION POLICY

It is important that NMAA establish and maintain a trusting and beneficial relationship with the community and the news media. To do this requires all information about NMAA's position on public issues to be managed and distributed in a consistent manner.

Team members should not release information to the news media about any NMAA activity or business that may be interpreted as NMAA's position on any activity or business that merits or requires public disclosure. Team members should direct all news media or public statement requests for NMAA's position to the company President or Vice President.

COMPUTER AND NETWORK USAGE POLICY

NMAA encourages the use of email, the Internet, and various computer hardware and/or software as tools to assist in accomplishing NMAA's legitimate business objectives. Email, the Internet, and computer equipment enhance the quality and efficiency of communication among management, team members, current and prospective customers and others involved in our business. However, these devices can be misused with potentially serious consequences for both NMAA and the team members who violate the stated policy. This policy is intended to define the parameters of the appropriate use of email, Internet, and computer hardware and/or software.

As a rule, it is expected that all team members use common sense and sound professional judgment when utilizing the email system, the Internet, and/or the computer hardware/software. In addition, team members should respect the rights and sensitivities of the recipients and/or viewers and should ensure that all use of email, Internet, and the computer hardware/software reflects the professional image that NMAA wishes to portray.

Any team member who has access to the Internet at work will be permitted to use the Internet for appropriate business-related purposes during business hours. Team members are expected to use the computer/Internet responsibly and productively. Internet access should be limited in nature, scope, and appropriateness. At no time (even during non-working time) will team members be permitted to access inappropriate sites. Examples of inappropriate sites include, but are not limited to, "adult" sites, sites containing pornography, hate group sites, chat rooms, etcetera.

The same policies and rules of conduct and common courtesy that generally apply, also apply to communication by email or other electronic media. Therefore, emails that violate the company's harassment policy, such as the display or transmission of sexually explicit images or cartoons, ethnic slurs, racial comments, off-color jokes, or anything that may be construed as violating company policies on harassment, solicitation, insubordination, etcetera is strictly prohibited. Additionally, team members should use professional respect and courtesy when sending email messages to any other party. Rude or threatening messages are strictly prohibited. Team members should be considerate of the recipients' time when sending email messages. Use good judgment when sending messages, and do not send "junk mail" messages.

Further, team members are not permitted to use a code, access a file, or retrieve any stored communication unless authorized to do so or unless they have received prior clearance from an authorized NMAA team member. All passwords, codes and access rights are the property of NMAA.

In keeping with this policy, all electronic and telephone communication systems, such as computers, fax machines, email, the Internet, printers, local area networks, copy machines, and all information transmitted or stored in these systems is the property of NMAA. To ensure that the use of the equipment listed above is consistent with the company's legitimate business interests, authorized representatives of NMAA may monitor the use of such equipment from time to time. This means that NMAA retains the right to access and review information on all computer equipment, software, email, etc. Thus, team members should not expect any information stored or transmitted on this equipment to be private, despite the use of passwords or other such protections. If review of the information stored on electronic media reveals that a team member has been using this equipment for an unauthorized purpose or otherwise violating NMAA's policy, that team member will be subject to progressive discipline, up to and including termination.

Use or copying of any software product in violation of the applicable license agreement is strictly prohibited. Team members are not permitted to use, copy, modify or transfer computer software, except as expressly authorized by the Human Resources Manager or an authorized company representative. In addition, for security reasons, team members must not use or install any personal copies of software on NMAA equipment. All team members are required to immediately alert management if they become aware of any illegal copying or of any other security lapses.

CELLULAR PHONE/ELECTRONIC COMMUNICATION DEVICE POLICY

This policy outlines the use of electronic communication devices at work, including but not limited to cellular phones, digital wireless phones, radio-phones, pagers, personal digital assistants (PDAs), MP3 players, I-pods, I-pads, digital books and tablets, games, or any type of hands-free device, headphones and ear buds, cameras and recording devices for voice or video. The primary objective of this policy is to promote safety, quality, and productivity.

While at work, team members are expected to exercise discretion in using personal cellular phones and other electronic communication devices. Excessive personal calls or texts, during work time, can interfere with productivity and be distracting to others. Team members are encouraged to limit their personal communications to meal and break periods, and to ensure that friends and family members are aware of NMAA's policy. Exceptions may be made for emergency situations; however, these exceptions must be approved in advance by management.

The personal use of ear buds, headphones, and radios is prohibited during normal business hours. Upon approval, headphones or ear buds may be used for work-related purposes, such as online training.

When travelling on company business, team members are expected to follow applicable state or federal laws or regulations regarding the use of electronic devices. Team members whose job responsibilities include regular or occasional driving are expected to refrain from

using mobile devices while driving. Regardless of the circumstances, including slow or stopped traffic, team members are required to pull off the road and seek a safe parking area before placing or accepting a call or text. Special care should be taken in situations where there is heavy traffic, inclement weather, or the team member is driving in an unfamiliar area.

Team members who are charged with traffic violations resulting from the use of mobile devices while driving will be solely responsible for all liabilities that result from such action.

Team members who work in production, shipping/receiving, and maintenance areas must not carry mobile devices as doing so can potentially be a major safety hazard. The use of cellular phones or other devices while operating industrial equipment (forklift, man-lift, front-end loader, etc.) is prohibited.

Certain team members may be issued a company-owned mobile device. Although these devices are expected to be used for work-related communications, personal use is permitted if it is used with discretion and not abused.

Team members in possession of company provided mobile devices are expected to protect the equipment from loss, damage, or theft. Upon resignation or termination of employment, or at any time upon request, the team member may be asked to produce the phone/device for return or inspection. Team members unable to present the phone/device in good working condition within the period requested may be expected to bear the cost of replacement.

Company policies pertaining to harassment, discrimination, confidentiality, and ethical conduct apply fully to electronic device usage. Non-compliance will result in disciplinary action, up to and including termination of employment.

Due to the potential explosion hazard, cellular phones and other mobile devices are not permitted in production, shipping/receiving, and maintenance areas.

DRESS CODE AND PERSONAL APPEARANCE POLICY

Appropriate dress and personal appearance will contribute to a safe and customer-oriented work environment. Personal hygiene, neatness, and cleanliness are important to those who work closely with you. A "common-sense" approach to hygiene and appearance will contribute to a successful team-oriented work environment. Questions regarding the Dress Code and Personal Appearance Policy should be directed to Human Resources.

Guidelines:

The following guidelines have been established to prevent injury and present a professional image of our workforce to customers.

- As a service to our team members, the company has contracted with a supplier to provide uniforms to our team members. This service includes the convenience of having uniforms picked up, laundered, and returned to the plant.

- Uniforms and personal attire are to be kept in good condition and neat in appearance.
- Legs must be covered with full-length pants when working in plant production areas.
- Tank tops, or halter tops are not appropriate for the workplace. All shirts must meet the belt line.
- Shirts that completely cover the shoulder and arm pit area (muscle shirts or sleeveless shirts with a finished hem) are acceptable.
- Any clothing that is loose, baggy, or in any way presents a potential safety hazard should not be worn in plant production areas. Loose fitting clothes that can get caught in moving parts on equipment and machines must be tucked into pants.
- No dangling jewelry is to be worn in the production, shipping/receiving, and maintenance areas, including but not limited to watches, earrings, and necklaces. Anyone working in a productive capacity must either remove all rings or wear protective gloves related to their job function. Members on a tour of our facility are exempt from this requirement.
- Any shoes that have open toes, open heels, or high heels are not allowed in the plant production areas.
- Hair, including facial hair, which is excessive in length, will need to be properly secured to eliminate health or safety risks in our work environment. Long hair (on or past shoulder length) must be tied back and secured either on the head or tucked into a shirt.
- Fingernails that are excessive in length will need to be properly trimmed to avoid health or safety concerns.
- As a matter of respect and courtesy to others, all team members should use good judgment in grooming and personal hygiene and present a neat and clean appearance.

Any team member found wearing clothing not within the appropriate guidelines will be sent home to secure appropriate clothing. This absence will count towards discipline per the attendance policy.

Office Dress Code:

Team members working in an office setting should dress in such a manner that reflects an efficient, orderly, and professionally operated organization. Management and office staff are expected to demonstrate good judgment and professional taste in their selection of clothing to wear to work. Overly casual or recreational attire in the office is unacceptable.

Eligible staff may also choose to take advantage of the office uniform program offered by the company. Please see a member of Human Resources for additional information.

This dress code is provided as a general overview of appropriate business attire. Because all casual clothing is not suitable for the office, these guidelines will help you determine what is appropriate to wear to work. Clothing that reveals too much cleavage, your back, your chest, your feet, your stomach, or your undergarments is not appropriate for a place of business, even in a business casual setting.

The following guidelines identify what is acceptable as business attire. Items that are not appropriate for the office are also listed. Neither list is all-inclusive, and both are subject to change.

Dress Slacks, Skirts, and Dresses

Dress slacks, khaki, or chino style pants are considered appropriate business attire. Casual skirts and dresses must reach knee-length.

Inappropriate slacks or pants include jeans, sweatpants, exercise pants, shorts, leggings, and any other form-fitting pants. Short skirts, miniskirts, sun dresses, beach dresses, shoulder-strap and strapless dresses are inappropriate for the office. Extremely loose fitting or baggy clothing is inappropriate.

Shirts, Blouses, and Sweaters

Casual shirts, dress shirts, collared polo-style shirts, blouses, and sweaters are acceptable attire for work. Clothing that has the company logo is encouraged.

Inappropriate attire for work includes tank tops; midriff tops; shirts with potentially offensive words, terms, logos, pictures, cartoons, or slogans; halter-tops; tops with bare shoulders; revealing or see-through clothing; sweatshirts; and T-shirts, unless worn under another garment.

Shoes and Footwear

Shoes should be selected for safety and comfort and be otherwise appropriate for an office work setting. Casual shoes or dress shoes, or footwear designed for business purposes are acceptable. Closed toe and closed heel shoes are required. Heels should not exceed two inches.

Inappropriate footwear would include flashy athletic tennis shoes, sandals, flip-flops, slippers, platform shoes, and any shoe with an open toe and/or open heel.

Hats and Baseball Caps

Hats and baseball caps are not appropriate in the office.

Jewelry, Makeup, Perfume, and Cologne

Jewelry should be in good taste and kept to a minimum. Remember that some individuals may have allergies to the ingredients used in perfumes and makeup, so wear these substances with restraint.

Tattoos and Piercings

Tattoos and body piercings should not be visible in work attire.

Management takes appropriate steps to provide reasonable accommodation upon request to employees whose religious beliefs or restrictions create a conflict with the company's policies, practices, or procedures so long as doing so does not cause an undue hardship. If you need accommodation, please provide a written description of your situation and your needs for Human Resources, and someone will contact you to discuss your request.

IV. NMAA ATTENDANCE POLICY

ATTENDANCE

Good attendance is vital to the success of the company's operations. When team members are absent or tardy, productivity is interrupted, and increased costs occur when others must perform your work.

NMAA expects all team members to be dependable and punctual in reporting for scheduled work. Team members should maintain regular attendance and be in their respective work areas ready to work at the start of their scheduled shift and after all scheduled breaks. Excessive absenteeism, tardiness, or patterns of absence may result in discipline, including negative performance evaluation or termination.

NMAA understands there will be times when an absence is unavoidable and may cause team members to be absent or tardy. Therefore, NMAA has a no-fault system that allows you to accumulate some absences before any corrective action is taken. It is only when these absences become excessive, and warnings issued, that a team member needs to be concerned about his or her attendance practices. Attendance is your responsibility, and each team member is expected to monitor their personal attendance record and strive to maintain acceptable attendance.

Call-In Procedures

NMAA has provided a designated Employee Absence Call-In number for team members to report absences. Team members must personally contact the company unless their condition prevents them from doing so. It is the team member's responsibility to call the **Employee Absence Call-In** line, prior to the start of their shift.

Notification of each absence or tardy can be done by leaving a voicemail at **(812) 342-1141, extension 155**. The message should include the following information:

1. Name
2. Name of immediate supervisor/manager
3. Reason for absence
4. Expected return to work

Failure to properly report each absence or tardy is considered a "No Call/No Show" and will be subject to disciplinary action, up to and including termination. Refer to Section X of this Handbook for a listing of contacts and telephone numbers.

Definitions

- Occurrence – Any unexcused time missed during a scheduled workday includes Absence, Tardy, and Leave Early
- Absence – Not present at work during a scheduled workday.
- Linked Absence – Multiple consecutive day absences for the same documented medical reason.
- Tardy – Any unexcused late arrival to work.
- Leave Early – Any unexcused leave from work prior to the end of the workday.
- Paid Time Off (PTO) – “Bank” of time available to team members after 90 calendar days of service to be used to pay for absence(s). PTO will be paid as straight time and does not count toward calculation of overtime. Team members will receive a PTO bank of up to 48 hours, depending on eligibility. PTO can be used in minimum 30-minute increments.
- Excused Time – Time away from work that has been pre-approved by the supervisor/manager no later than 24 hours prior to the scheduled absence. Excused time does not count toward the Corrective Action process.
- Approved Leave – Time away from work that falls under one of the following categories and is described below: Family and Medical Leave Act (FMLA) or other approved Medical Leave, Jury Duty, Military Leave, and Bereavement. Approved leave will not be recorded as an absence under this policy. Please see Section VI of this Handbook for additional examples of approved leave.
- Scheduled Workday – Regularly scheduled day/shift, mandatory overtime, or voluntary overtime agreed upon between team member and supervisor/manager.
- Lack of Work – Situation where management has determined there is not enough work for a team member for a portion of his/her shift.
- Rolling Twelve Months – A period of 12 consecutive months from time of occurrence. For example, if a team member receives an occurrence on January 1 of the current year, the occurrence will remain on the team member’s attendance record until the end of shift January 1 the following year.

Personal Leave

A personal leave of absence is generally caused by external, non-work-related situations requiring the team member’s absence from work. A written request must be completed by the team member and approved by management and Human Resources.

- Personal leave of up to 30 days may be approved due to circumstances that are significant in nature and cannot be planned or addressed by using vacation time.
- A team member must complete the Initial Evaluation Period to be eligible for personal leave.
- Personal leave will not be granted until a team member has used all his or her paid leave.
- If a team member has a death in the family not covered by a bereavement leave and has exhausted all vacation, a personal leave may be granted.
- If the team member has compelling personal business or a personal crisis and has exhausted all vacation, a personal leave may be provided.
- All personal leaves will be unpaid and must be pre-approved by the supervisor and Human Resources.

Absence Without Leave (No Call/No Show)

A team member who is absent for three consecutively scheduled workdays, without notifying the company, or who fails to return to work in a timely manner from active military duty or other qualified leave, will be considered to have voluntarily resigned without notice.

Return to Work

When a team member has been absent for three or more days due to his or her own health condition, the team member may be required to present appropriate documentation from his/her healthcare provider that he or she was under the care of the healthcare provider and can return to work and perform the essential functions of his or her job before the team member is permitted to return to work.

HOURLY NON-EXEMPT TEAM MEMBERS

Attendance Point Program

NMAA maintains a point system to track team member attendance. The point system is enforced consistently and in a non-discriminatory manner. All absences will be counted as points, except: approved Family and Medical Leave Act (FMLA) or other approved Medical Leave, Bereavement Leave, Military Leave, Jury Duty, Vacation, Personal Leave of Absence, Workers' Compensation, voting time, off-site training, disciplinary suspension, extremely severe weather, uncontrollable circumstances which shut the plant down or curtail plant operations. Please refer to Section VI of this Handbook for additional details.

Absenteeism is defined as a period of time a team member is absent from scheduled work, including:

- Arriving late for scheduled work shift or overtime
- Departing early from the scheduled work shift or overtime
- Leaving and returning during the scheduled work shift or overtime
- Absent the entire scheduled work shift or overtime
- Absent or tardy for a safety meeting or required training

Any visit to the Enkei Care Center (ECC) which results in restriction from work will be considered an absence under the NMAA Attendance Policy.

Excused Tardy "Grace" Periods

NMAA will allow team members one tardy grace period of no more than 15 minutes per calendar quarter. The tardy grace period will be considered an excused absence; no attendance points will be assessed. The tardy grace period will be unpaid time.

Guidelines for Assessing Absence Points

- Team members will be assessed **one-quarter (.25) of a point** for each occurrence of:
 - Reporting to work late within 30 minutes of the team member's schedule start time
 - Leaving work early within 30 minutes of the team member's shift end
 - Any unexcused absence of 30 minutes or less during a scheduled shift
 - Missing a clock in/out punch (not to exceed one-quarter (.25) of a point per scheduled workday)
- Team members will be assessed **one-half (.50) of a point** for each occurrence of:
 - Reporting to work late more than 30 minutes of the team member's scheduled start time. Not to exceed one-half of the scheduled shift
 - Leaving work more than 30 minutes of the team member's scheduled shift end. Not to exceed one-half of the scheduled shift
 - Any unexcused absence of more than 30 minutes, not to exceed one-half of the team member's scheduled shift
- Team members will be assessed **one (1) point** for each occurrence of:
 - Failing to report for work on any scheduled workday (absence properly reported as outlined in Call-in Procedures)
 - Multiple consecutive day absences (will result in up to one (1) point per day unless otherwise outlined in this policy)
 - Linked multiple consecutive day absences (may be "linked" and assessed no less than one (1) point, provided the necessary documentation is submitted to Human Resources)
 - Any unexcused absence of more than one-half of the scheduled shift
- Team members will be assessed up to **one and one-half (1.5) points** for each occurrence of:
 - Failing to properly report each absence or tardy (as outlined in the Call-in Procedures)

Note: No more than one and one-half (1.5) points will be assessed per day.

If a team member is scheduled for mandatory overtime or volunteers to work on a non-scheduled day and fails to report to work or has an unexcused absence, the appropriate point(s) will be applied to his/her attendance record.

Point System

0 - 3.75 Points

4.0 Points

6.0 Points

7.0 Points

Excess of 7.0 Points

Corrective Action Steps

No Formal Action; Counseling May Occur

Step 1: Verbal Counseling

Step 2: Written Warning

Step 3: Final Written Warning

Step 4: Termination

The Corrective Action Steps are designed to address and correct an attendance problem in a positive manner and emphasize the corrections or improvements needed regarding the team member's attendance. The Corrective Action Steps are progressive in nature, providing the team member with sufficient notice of the attendance problem and ample time to correct the situation.

Ordinarily, the following steps will occur as discipline to address attendance problems.

Step 1: Verbal Counseling

Team members will receive a verbal counseling and a written notification of the counseling when **four (4) points** have been accumulated within a consecutive twelve-month period. Step 1 of the Corrective Action will remain in effect for a rolling 12-month period until points fall below four (4). Record of this warning will be placed in the team member's personnel file.

Step 2: Written Warning

Team members will receive a written warning when **six (6) points** have been accumulated within a consecutive 12-month period. When Step 2 of the Corrective Action is initiated, it will remain in effect until points fall below six (6). Record of this warning will be placed in the team member's personnel file.

Step 3: Final Written Warning

Team members will receive a Final Written Warning when **seven (7) points** have been accumulated within a consecutive twelve-month period. When Step 3 of the Corrective Action is initiated, it will remain in effect until points fall below seven (7). Record of this warning will be placed in the team member's personnel file.

Any team member receiving more than one Step 3 Final Written Warning within a rolling consecutive twelve-month period will be subject to immediate termination.

Step 4: Discharge

Team members will be subject to discharge when they **exceed seven (7) points**.

Generally, team members will be notified of their attendance status, in writing, at Corrective Action Step 1, Step 2, and Step 3. Their supervisor will, likewise, receive that same information. Recordkeeping will be the responsibility of the Human Resources Department and they should be contacted immediately if there are any questions regarding individual attendance records. However, it is the individual team member's responsibility to keep track of his/her own points standing, and the Human Resources Department will not provide current attendance point status outside of the noted documents above.

Habitual, excessive absences, tardiness, and/or repetitive patterns of absence are grounds for discipline up to and including termination, regardless of the number of points accumulated by a team member.

NMAA reserves the right to accelerate the Corrective Action Steps when warranted. In the event of multiple absences, team members may be subject to more than one (1) Corrective Action Step at any given time.

NMAA reserves the right to revise or eliminate this procedure at any time. This policy does not create a contract of employment for any length of time, nor does it change the at-will nature of employment.

Attendance of New Hires (Initial Evaluation Period)

During the Initial Evaluation Period, the introductory ninety calendar days of employment, newly hired employees are expected to maintain acceptable attendance. During this introductory period, the attendance of all new hires will be closely monitored and will not be governed by the Corrective Action procedures as outlined above.

If, at any time during the Initial Evaluation Period, a new hire demonstrates an unacceptable attendance pattern, they will be subject to disciplinary action up to and including immediate termination.

TIMEKEEPING (CLOCKING IN/OUT)

It is essential that an accurate record be maintained of all hours worked, as well as the reason for team member absences. Each team member is responsible for following the proper procedures when clocking in/out. Time badges are issued to each team member to be used for facility entry and timekeeping purposes.

Procedure:

- All non-exempt team members will record their time by utilizing the automated time collection system (time clock). All hourly pay is calculated by actual clock-in and clock-out time.
- Team members are required to clock in at the beginning of their scheduled shift.
- Team members are required to clock out at the end of their scheduled shift.
- Unless authorized in advance, you should not clock-in for work more than seven minutes before the beginning of your work shift or clock-out seven minutes after the end of your work shift. All work performed during unscheduled time requires prior approval from your supervisor or a member of management.
- Off-the-clock work is prohibited.
- Team members are required to clock-out and clock-in when leaving the facility during their regular scheduled shift for any reason other than work-related.
- Team members must not allow another individual to use their badge or code to register an in/out clock punch on their behalf. Altering, falsifying, or tampering with time records may result in disciplinary action, up to and including termination of employment.
- Team members who are unable to clock in/out must immediately notify their supervisor. The supervisor will manually input an actual start time and/or end time.

The input by the supervisor will become the official transaction history, and this time will be used for attendance and payroll purposes.

- It is the responsibility of the team member to properly care for their time badges. If lost or damaged, the team member may be charged a replacement fee.
- Upon separation, time badges are expected to be returned to Human Resources.

PAID TIME OFF (PTO)

While perfect attendance should be everyone's goal, NMAA realizes that some absenteeism is unavoidable. For this purpose, NMAA provides non-exempt team members with a "bank" of up to 24 hours of Paid Time Off (PTO) at the beginning of each calendar year and the opportunity to earn additional PTO as an attendance incentive. Non-exempt team members who have been employed by NMAA for a consecutive ninety calendar day period are considered eligible for PTO.

These PTO hours will be provided as of January 1 for each active non-exempt team member, following the ninety-day initial evaluation period. The PTO for team members hired during the current year will be based on their hire date and pro-rated at two hours per full calendar month remaining in the year. PTO hours may not be carried over from year to year, but unused accrued PTO up to 48 hours will be bought back by the company at the end of the calendar year.

Team members unable to report to work due to illness or other reasons (call-in absences), must use available PTO hours. Team members will be permitted to use PTO to cover an entire shift absence to avoid an attendance infraction. Team members can also request the use of PTO in advance of their absence. If approved by the supervisor, these absences will be considered excused and will not count against the team member's attendance record. Documentation supporting the PTO should be completed, signed by the team member and supervisor, and returned to Human Resources.

PTO can be used in minimum increments of 30 minutes. Compensation will be based on your regular hourly base rate of pay, excluding shift premium. For payroll, PTO hours do not count toward overtime calculation.

At the end of the calendar year, any unused accrued PTO up to a maximum of 48 hours will be paid to the team member through the payroll system.

Lack of work situations will not be charged as an unexcused absence. PTO or vacation may be used to cover this time at the request of the team member.

Team members who have given notification of resignation or are considered as having resigned due to three consecutive scheduled workdays "No Call/No Show" will no longer be eligible for PTO and any unexcused absence will remain unpaid. Any unused accrued PTO will be forfeited and not paid to a team member who has resigned or terminated.

Perfect Attendance Recognition:

Team members who maintain perfect attendance are eligible to earn additional Paid Time Off (PTO).

Quarterly Award

Eligible team members, who work an entire calendar quarter without incurring an attendance point or using any PTO, will receive an additional four hours of PTO. Eligible team members can earn a perfect attendance incentive of up to sixteen additional hours of PTO per calendar year. The following criteria must be met to receive perfect attendance incentives:

- No attendance points were incurred; and
- No Paid Time Off (PTO) was used to cover absence; and
- FMLA Leave or other leave was not taken during the stated period; and
- No disciplinary suspension occurred.

Annual Award

Team members who maintain perfect attendance for an entire calendar year will receive an additional eight PTO hours to be added to their PTO accrual as of January 1 of the following year. Please refer to the Paid Time Off (PTO) policy for more details.

V. YOUR HOURS OF WORK AT NMAA

EMPLOYMENT STATUS

NMAA will endeavor to employ full-time regular team members in all its positions; however, when short-term work requirements or part-time assignments develop, NMAA reserves the right to use personnel from an outside temporary employment agency or find other ways to acquire temporary or part-time help.

Employment relationships will be “Employment at Will” arrangements, which allow either party to terminate the employer/employee relationship at any time and for any or no reason, with or without notice. Any assurance to the contrary must be in writing and signed by the President and/or Vice President.

Your job status at NMAA will typically be in one of the following three categories:

1. **Regular full-time team members:** Team members who regularly work a minimum of thirty (30) hours per week on a continuous basis.
2. **Regular part-time team members:** Team members who regularly work more than twenty (20) but less than thirty (30) hours per week on a continuous basis.
3. **Temporary employee:** Individuals who are hired as interim replacements to temporarily supplement the work force or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Temporary employees may work either full or part-time work schedules. Employment beyond any initially stated period does not in any way imply a change in employment status. Similarly, employment for a specific period does not guarantee employment during the entire period. Temporary employees retain that status unless and until they are notified of a change. While temporary employees receive all legally mandated benefits, such as Workers' Compensation insurance and social security, they may be ineligible for other benefit programs and do NOT accrue any form of service credit.

In addition, your job status will be further classified as either non-exempt or exempt from federal and state wage and hour laws. Exempt/non-exempt distinctions are determined based on the responsibilities of the position. A team member's exempt or non-exempt classification is subject to change if management deems such change appropriate.

Non-exempt employee: Non-exempt or typically “hourly” team members are paid wages for the actual hours they work and are entitled to overtime pay if they work more than 40 hours per work week.

Exempt employee: Team members are categorized as exempt if they are salaried and perform sufficient executive, administrative or professional duties. Exempt team members are paid on a salaried basis and are not entitled to overtime pay regardless of the number of hours they work.

WORK HOURS AND SHIFTS

The normal work schedules for NMAA consist of four twelve-hour shifts for the Production and Maintenance Departments, and an eight-hour shift for all other departments. Starting and stopping times can vary with shifts and production requirements. Your supervisor will inform you of your work hours. It is important that you are in your designated work area at the start of your shift.

NMAA will make every reasonable effort to provide full-time work for NMAA team members. However, changing economic conditions, customer demands, and production schedules may make it impossible to guarantee a minimum number of hours. These factors and production schedules may also warrant the need for some team members to be placed on a work schedule that is different than their normal working times.

WORKDAY

Your workday begins at the starting time for your assigned shift and continues until the conclusion of your assigned shift plus any overtime. No single workday shall exceed sixteen consecutive hours.

The "normal" work schedule for all salaried office team members is eight hours per day, five days per week, typically from 7:30am-4:30pm with a one-hour lunch break. The "normal" work schedule for Quality Control, Shipping/Receiving and certain Maintenance team members is eight hours per day, five days a week, with a paid twenty- minute lunch break, timing of which shall be determined by the shift supervisor. Exceptions may occur and are based upon business need.

The "normal" work schedule for all Production and certain Maintenance and certain Shipping/Receiving team members is twelve hours and ten minutes per day, three to four days per week with a paid thirty-minute lunch break, timing of which shall be determined by the shift supervisor. Exceptions may occur and are based upon business need.

Due to the nature of our business, work schedules may be changed as dictated by business conditions. Management reserves the right to adjust work schedules, if needed, to conduct our business in the most efficient manner. If a change in the work schedule is required, team members will be notified in advance whenever possible.

WORKWEEK

Your NMAA workweek, for payroll purposes, extends from Sunday through Saturday. Normally, NMAA office team members work a forty-hour week. All other team members work either twelve-hour and ten-minute or eight-hour shifts covering seven (7) days per week. Eight-hour shift team members average forty hours per week. Twelve-hour shift team members average approximately forty-two hours a week. This equates roughly to thirty-six hours in the first week and forty-eight hours the second week.

OVERTIME

Exceptions to established time schedules may be required to maintain the overall effectiveness of our business.

On occasion, it may be necessary to schedule overtime to meet customer requirements or to respond to the maintenance needs of the plant. Your supervisor is responsible for the scheduling and approval of all required overtime. You are required to work all scheduled overtime hours unless you have received approval in advance from your supervisor not to work the overtime. As much as ninety-six hours' notice, when possible, will be given when these situations occur; however, this timing notification is not mandatory.

Only non-exempt team members are entitled to overtime pay. Team members who work overtime without receiving prior authorization may be subject to disciplinary action, up to and including termination of employment.

TIME AND ONE-HALF

Eligible team members will be paid one and one-half times their regular pay rate for all hours worked over forty (40) hours in one workweek.

DOUBLE TIME

Team members normally scheduled to work a 12-hour shift will be paid two times their hourly rate for hours worked on a non-scheduled Sunday, provided he/she has worked their complete schedule. Team members normally scheduled to work an eight-hour shift will be paid two times their hourly rate for hours worked on a non-scheduled Sunday, provided he/she has worked their complete schedule.

All overtime work, including work from home, must be approved in advance by your supervisor or a member of management.

SHIFT PREMIUM

NMAA provides a \$1.00 per hour shift premium for those hourly team members who work various night shift schedules.

In addition, NMAA provides a "Temperature Differential" premium to all hourly Production/Maintenance/Shipping/Receiving team members, for the extreme conditions that are endured during the summer months. A \$0.50 per hour premium is provided during periods of extreme heat and humidity of the local climate. These premiums apply to all hours worked.

EMERGENCY CALL-IN RULE

When a Maintenance, Production and/or Shipping/Receiving team member is called to the job at a time other than his/her regularly scheduled shift, the following call-in rule will apply.

Pay will be based on actual time worked, unless it is less than two hours, in which case, the minimum amount paid will be two hours, at the team member's regular hourly rate. These hours will count toward the calculation of potential overtime.

LACK OF WORK GUIDELINES

In the event NMAA has determined there is insufficient work available to fully staff a department for a portion of a shift or for an entire shift, the following guidelines will apply:

- There is no guarantee of minimum hours to be worked in a week.
- If the company determines there is not sufficient work available to fully staff a department for a portion of a shift or for the entire shift a lack of work situation may occur.
- If another department needs assistance, the company may send an employee to that department rather than release him/her for the day.
- Depending on the required skill set, NMAA will make a reasonable effort to release temporary workers before releasing full-time team members.
- The company may solicit volunteers to be released for the day or remainder of the shift.
- The company may direct certain individuals, based on job duties, to be released for the day or remainder of the shift.
- No attendance infraction will result from a lack of work situation.
- Missed time due to a lack of work situation will be unpaid.
- Team members may elect to use available paid leave such as PTO or vacation to cover a lack of work situation.

REST PERIODS (LUNCH & BREAKS)

All non-exempt team members will be provided with paid rest periods, including a lunch period at or near the middle of their shift. Hourly team members assigned to an eight-hour schedule will be provided with a total of forty minutes for paid rest periods; hourly team members assigned to a twelve-hour schedule will be provided with a total of sixty minutes.

Based on company needs, work schedules are subject to change.

PRODUCTION / SHIPPING & RECEIVING		
Shift	Work Schedule	Total Rest Period (Lunch & Breaks)
A / C	8:00am - 8:10pm	60 minutes / 12-hour shift
B / D	8:00pm - 8:10am	60 minutes / 12-hour shift
1st	7:30am - 3:30pm	40 minutes / 8-hour shift

MAINTENANCE		
Maint. A / C	6:55am - 7:05pm	60 minutes / 12-hour shift
Maint. B / D	7:00am - 3:00pm	40 minutes / 8-hour shift

Team members will be expected to remain onsite during their scheduled shift, unless otherwise authorized. For convenience, a lunchroom with vending machines and appliances is located onsite.

The supervisor is responsible for balancing workloads and scheduling meal breaks. Your supervisor will advise you of the time these breaks are to be taken. You should return and be prepared to work promptly at the end of your break. Based upon business needs, there may be times when you could be required to change or postpone your break to finish a project.

LACTATION SUPPORT IN THE WORKPLACE POLICY

The company will provide a private location where a team member can express breast milk. A team member who needs to express milk may do so during any regular meal or rest break period. A team member who needs to express milk should contact Human Resources to arrange a time and location to do so. Team members will be allowed reasonable (typically not to exceed 20 minutes) paid break to express milk.

Team members may keep expressed breast milk in their own cooler packs or in a designated refrigerator until the end of the workday. Team members must store the expressed milk in their own containers. Each container must be clearly labeled with the team member's name and the date.

TRANSFER POLICY

NMAA supports shift and/or department transfers to promote a flexible workforce. It is understood that team members may wish to move between shifts and departments. Team members who wish to transfer may submit a completed Transfer Request form to the Human Resources Department. Generally, team members will not be eligible to transfer until they have completed at least three consecutive months of service with NMAA.

When an open position occurs, the Transfer Request log will be reviewed to match active requests on file at the time of the opening. Only those requests on file, prior to the opening, will be considered. It is the team member's responsibility to notify Human Resources if they no longer wish their Transfer Request form to be considered active.

Management reserves the right to determine the qualifications required for the position and which team member best meets those qualifications. In reviewing transfer requests, acceptable work performance and business needs will be considered. In the event more than one team member is seeking an open position, and all qualifications being equal, length of service may be considered the determining factor. It should be noted; however, that transfers may be determined based upon the immediate need of an applicant's skills.

If a team member elects not to accept an opportunity to move, it will be noted in the Transfer Request log that the team member declined the opportunity. The team member must submit a new request form for future considerations. A team member's transfer request will remain active until he/she is transferred or notifies Human Resources, in writing, that he/she is no longer interested in transferring.

Based on business necessity, the company will limit the number of transfers from any one department or shift to ensure that production requirements and efficiencies will not be adversely affected. Management reserves the right to revise or eliminate the Transfer Policy at any time.

JOB POSTING POLICY

NMAA believes in a practice of “promotion from within” while at the same time seeks to select the most qualified individuals to fill open positions. The Job Posting Policy is a way for qualified team members to be considered for open positions.

Generally, notices of all regular full-time openings are posted, although NMAA reserves its discretionary right not to post all open positions. As with any policy or procedure, it may become necessary for management to make decisions that are in the best interest of the organization and align with company goals and direction which may deviate from this policy.

Job posting is a way to inform team members of job opportunities in other departments and/or shifts. The job posting procedure helps to identify qualified and interested applicants who might not otherwise be known to the hiring manager or supervisor. Other recruiting sources may also be used to fill open positions.

Posting Process

- Open positions will be posted on the designated bulletin board for a minimum of three days covering all shifts. The posting will include a description of the position and its minimum requirements.
- To apply for a posted job opening, interested team members will be required to return a completed Transfer Request form prior to the posting deadline.
- No applications will be accepted after the published job posting deadline.
- Team members may apply to a job posting at any time; however, they must meet eligibility requirements.

Selection Process

- Once a posting closes, Human Resources will compile a roster of all eligible applicants.
- Candidates must meet the minimum qualifications listed on the posting.
-
- Any active disciplinary or corrective actions will be reviewed and considered.
- Candidates cannot have a most recent performance review rating that is considered unsatisfactory.
- Qualified candidates will participate in an interview to evaluate skills and experience.
- In the event there is no qualified internal candidate, the open position will be made available to outside candidates.

Management reserves the right to revise or eliminate the Job Posting Policy at any time.

VI. COMPENSATION AND BENEFITS

PAYROLL PROCEDURES

NMAA's compensation programs are designed to focus the team members on meeting strategic individual, team and/or business goals. These goals align with overall business objectives.

NMAA rewards team members for contributing to our success. Our pay-for-performance philosophy helps us attract and maintain the best team members possible. We recognize that our team members are the greatest assets, and we will be competitive within the industry and area to recruit, retain and motivate team members.

Generally, an annual review and survey of local industry wages and benefits will be conducted. As appropriate, adjustments to wages and benefits will be considered in conjunction with our business needs, pay philosophy and local industry standards.

Typically, wage and performance-based pay rate changes occur at the beginning of a full pay week. In other words, the rate change becomes effective the first day of the full pay week following the eligibility date.

FREQUENCY OF PAY CALCULATION

Team members at NMAA are paid bi-weekly. Each pay calculation will include earnings for all work performed through the end of the previous pay period. For payroll purposes, NMAA's pay week is considered Sunday through Saturday.

METHOD OF RECEIVING PAY

NMAA requires all team members to have their net pay direct deposited into the bank accounts of their choice. Payroll requires advance written authorization from team members before direct deposits can be made. Direct deposit requests normally take two pay periods to go into effect once the authorization forms are submitted to Payroll. All payroll-related compensation will be in the form of direct deposit.

Newly hired team members must provide direct deposit banking information to Payroll within the first three weeks of employment.

TIMING OF RECEIVING PAY

Team members will normally receive their pay, through direct deposit, in their accounts on Thursday morning of the pay week. In the event a holiday occurs during a pay week, the actual direct deposit to their account may be delayed. Team members should not expect direct deposit to their bank accounts prior to Thursday morning of the pay week.

PAY STATEMENT DISTRIBUTION

Team members can request to receive or will have access to an itemized statement of wages each pay period. Any questions concerning your pay statement or discrepancies with your paycheck should be reported to the Human Resources Department and/or Payroll as soon as possible.

Pay statements or paychecks will not be given to anyone other than the proper team member unless extenuating circumstances prevail. In such cases, prior written authorization from the team member and identification of the recipient is required.

PAYROLL DEDUCTIONS

Federal, state and local laws require NMAA to make various payroll deductions on your behalf. Amounts withheld will be based upon the information provided on the team member's Federal and State tax forms. These required deductions include Social Security and Medicare tax, Federal Income tax, and State Income tax, among others. Other deductions from a team member's pay will require advance written authorization from the team member or documented court orders.

FLSA SAFE HARBOR STATEMENT

Salaried exempt employees work as few or as many hours as are necessary to get the job done. For this reason, and subject to the exceptions below, NMAA's policy does not reduce a salaried exempt team member's predetermined compensation for **any** partial-day absence (other than intermittent or reduced schedule Family & Medical Leave Act "FMLA" Leave; any partial-week absence occasioned by NMAA or its operating requirements, including holidays and partial-week shutdowns; or because of variations in the quality of work performed).

Deductions from salary may occur in the following circumstances:

1. Full-day absences for personal reasons, other than sickness or disability in accordance with NMAA's policies;
2. Full-day absences due to the team member's own sickness or injury (including work-related injuries and FMLA-related absences). Such deductions will be made in accordance with NMAA's paid time off plans and state worker's compensation laws and regulations;
3. A penalty imposed for infraction of a safety rule of major significance;
4. Full-day absences for unpaid disciplinary suspensions under NMAA's disciplinary action policy for infractions of NMAA's workplace conduct rules; and
5. When no work is performed in a workweek.

NMAA's attendance and disciplinary action policies are applicable to an absence even though the absence may not be one for which a deduction from salary will be taken.

NMAA may require a salaried exempt team member to utilize paid time off benefits for partial-day absences occasioned by personal reasons or the team member's own illness or injury.

Exempt team members who believe their salary has been improperly reduced should report the concern immediately to the Human Resources Manager and/or Payroll Administrator. NMAA is committed to complying, and expects all supervisors and managers to comply with this policy and not to make improper deductions from team members' salaries. NMAA will reimburse a team member for any improper deduction.

YOUR BENEFITS AT NMAA

During the introductory ninety-calendar day period, new employees are eligible for benefits that are required by law (i.e. Workers' Compensation insurance and Social Security) but may not be entitled to other benefits, except as required by law or provided by the specific terms of the benefit plan.

GROUP HEALTH CARE COVERAGE

Full-time NMAA team members who have been employed for a consecutive thirty-calendar day period may be entitled to the benefits described in this section on the first day of the month following the thirty-day period. Some benefits require a minimum length of employment, or a minimum number of hours worked or have minimum age requirements.

Summaries of these benefits are provided here, but these are only meant to serve as guidelines to NMAA's benefit programs. The terms and conditions of the applicable insurance policy will determine the actual conditions and coverage of benefits. NMAA reserves the right to review, modify and/or terminate benefits at any time.

Benefits and eligibility are governed solely by the terms of the applicable plan documents, not by this Handbook or the summary plan descriptions. There can be no entitlement to any benefit created by verbal communication, by any document other than the plan document (including by the summary plan description), addendum to the plan document, or by any provision of this Handbook. See the actual plan documents or consult with Human Resources for further details. Check the bulletin boards for notices of benefit-related activities and events.

DENTAL & VISION CARE INSURANCE COVERAGE

NMAA offers dental and vision care insurance coverage to regular full-time team members beginning the first day of the month following thirty consecutive calendar days of employment. As with the health coverage, team members must complete the necessary enrollment information, and a benefits guide booklet will be made available to you.

GROUP LIFE INSURANCE COVERAGE

NMAA offers basic life insurance benefits to regular full-time team members who have been employed by NMAA for a consecutive ninety calendar day period. Team members' eligible dependents are also provided life insurance under this plan.

In addition to the basic life insurance benefit, NMAA also provides accidental death and dismemberment (AD&D) benefits. Details of these insurance benefits are discussed in separate booklets that will be made available to you.

DISABILITY INSURANCE COVERAGE

To assist our team members during periods of illness or injury, NMAA provides short-term disability (STD) and long-term disability (LTD) benefit programs. This benefit is paid for entirely by Nikkei MC Aluminum America, Inc. No enrollment in this plan is necessary. Full-time team members are eligible for this benefit after ninety consecutive calendar days of service. Part-time team members are not eligible for disability insurance coverage.

Short-term and long-term disability provides financial protection for you by paying a portion of your income while you are disabled. The amount you receive is based upon the amount you earn before the disability began, subject to all policy provisions.

For full-time team members who become disabled due to sickness or injury, there is a fourteen-day elimination period. Benefits for a payable claim begin the day after the elimination period is completed. For a full description of your coverage, including any additional benefits, exclusions or limitations that may apply, please contact the Human Resources Department.

During a team member's entitlement to these disability benefits, modified duty assignments may be made by the plan, consistent with the team member's medical condition. Team members who receive short or long-term disability benefits must report income they receive from other sources and any other work in which they engage. Finally, there are disability benefits available under the Workers' Compensation Act to NMAA team members who suffer an injury or illness arising out of and during their employment.

LEAVES OF ABSENCE

MILITARY LEAVE

A specific military leave policy is available to those team members who are called to service in the uniformed services, as defined by applicable law. All applicable laws while on military leave will govern the accumulation of service. Team members who would like information about this policy should contact the Human Resources Department. The company will comply with all applicable laws regarding military leaves of absence.

VOTING

NMAA believes it is the responsibility and duty of team members to exercise the privilege of voting in elections. In accordance with this philosophy, the company will grant its team members approved unpaid time off to vote if necessary due to work schedules and for periods of service as an election official.

All team members should be able to vote either before or after regularly assigned work hours. However, when this is not possible due to work schedules, managers are authorized to grant a reasonable period, up to three hours, during the workday to vote. Time off for voting should be reported and coded appropriately on timekeeping records.

TIME OFF FOR ELECTION SERVICE

Team members who are chosen to serve as election officials at polling sites will be permitted to take the required time off to serve in this capacity. Team members who are chosen to function as election officials must notify their manager a minimum of seven days in advance of their need for time off to accommodate the necessary rescheduling of work periods. Team members must report time engaged as an election official and this time will be coded accordingly on timekeeping records. Approved time off for election service is unpaid.

FAMILY AND MEDICAL LEAVE POLICY

This policy provides unpaid leave to eligible team members as required under the Family & Medical Leave Act of 1993 (FMLA), as amended. Generally, eligible team members may take unpaid leave for the birth, adoption, or foster placement of a child, for a team member's own serious health condition or to care for a spouse, parent, or child with a serious health condition (herein referred to as "Basic FMLA Leave"). Team members may also take leave for qualifying exigencies arising from a covered family member's service or call to service in the armed forces or to care for a covered family member injured or ill as a result of service in the armed forces (herein referred to as "Military Family Leave") as further described in this policy. Basic FMLA Leave and Military Family Leave are collectively referred to as "FMLA Leave."

ELIGIBILITY FOR FMLA LEAVE

Team members are eligible for FMLA Leave if they:

1. Worked for the company for at least twelve months;
2. Worked at least 1,250 hours for the company during the twelve months immediately preceding the request for leave; and
3. Are employed at a worksite that has fifty or more employees within a seventy-five-mile radius.

NMAA determines FMLA Leave on a "rolling" 12-month period measured backward from the date a team member uses any FMLA Leave. For purposes of leave to care for a covered service member only, the single 12-month period is the 12-month period measured forward from the first date of leave to care for a covered service member.

Team members with any questions about their eligibility for FMLA Leave should contact the Human Resources Department.

BASIC FMLA LEAVE

Team members who meet the eligibility requirements described above may qualify to take FMLA Leave for one of the following reasons:

1. The birth of a child or placement of a child with the team member for adoption or foster care;
2. To care for a spouse, son, daughter, or parent who has a serious health condition; or
3. For a serious health condition that makes the team member unable to perform the essential functions of his or her job.

MILITARY FAMILY LEAVE

Team Members who meet the eligibility requirements described above may be eligible for Military Family Leave under the following circumstances:

Qualifying Exigency Leave: Team members may be eligible to take up to twelve weeks of unpaid leave during any twelve-month period for qualifying exigencies arising out of a covered family member's active duty or call to active duty in the armed forces in support of a contingency plan. Qualifying exigencies include, but are not limited to, certain issues that arise from:

- Short notice of deployment
- Military events and related activities
- Childcare and school activities
- Financial and legal arrangements
- Rest and recuperation
- Counseling sessions
- Post-deployment activities

Leave to Care for a Covered Service Member: Team Members may be eligible to take up to twenty-six weeks of unpaid leave to care for a covered service member during a single twelve-month period. A covered service member is a member of the armed forces who has incurred or aggravated an injury or illness in the line of duty while on active duty in the armed forces that may render the family member medically unfit to perform the duties of the member's office, grade, rank or rating. Spouses who work for the company may be limited to a combined total of twenty-six weeks of leave during a single twelve-month period.

USE OF LEAVE

A team member is not required to use all his/her FMLA Leave at once. Certain FMLA Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Team members must make reasonable efforts to schedule leave or planned medical treatment so as not to unduly disrupt the company's operations. While a team member is on an intermittent or reduced leave schedule, the company may temporarily transfer the team member to an available alternative position with equivalent pay and benefits that better accommodates the recurring leave. If a team member's intermittent or reduced leave is unpaid, the company may reduce the team member's salary based on the amount of time actually worked.

FMLA Leave cannot be taken on an intermittent basis when it is necessary to care for a team member's child during the first year following birth or to care for a child placed with a team member for foster care or adoption, unless both the company and team member agree to such intermittent leave.

PAY, BENEFITS, AND PROTECTIONS DURING FMLA LEAVE

Leave is unpaid: FMLA Leave is unpaid leave (although team members may be eligible for short-term or long-term disability payments and/or Workers' Compensation benefits).

Substitution of paid time off for unpaid leave: Although FMLA Leave is generally unpaid, team members will be required to use available paid leave (including vacation, PTO, short-term disability, and workers' compensation) to be used concurrently with unpaid FMLA Leave.

If a team member on FMLA Leave is also receiving disability or workers' compensation benefits, they will be required to use paid leave during the designated waiting period. When a team member has used all his/her accrued paid leave, the team member may request additional leave provided the paid and unpaid leave does not exceed their allowance under the FMLA guidelines.

Medical and other benefits: During an approved FMLA Leave, the company will maintain the team member's health benefits. If paid leave is substituted for unpaid FMLA Leave, the company will deduct the team member's portion of the health insurance premium as a regular payroll deduction. If paid leave is not substituted for unpaid FMLA Leave, the team member must pay his or her portion of the premium, if applicable. Please see the Human Resources Department or the Payroll Administrator to make premium payment arrangements.

A team member on FMLA Leave is expected to timely submit his/her portion of the premium payment for health insurance to the company. If the company does not receive the team member's payment in a timely fashion, the team member's health insurance coverage may cease. If the team member elects not to return to work at the end of FMLA Leave, the team member may be required to reimburse the company for the cost of health insurance premiums paid by the company for maintaining coverage during FMLA Leave.

Use of FMLA Leave will not result in the loss of any employment benefit that accrued prior to the start of the team member's leave.

TEAM MEMBER RESPONSIBILITIES WHEN REQUESTING FMLA LEAVE

If the need to use FMLA Leave is foreseeable, the team member must give NMAA at least thirty days prior notice of the need to take leave. When thirty-day notice is not possible, the team member must give notice as soon as practicable in compliance with the company's normal notice and procedural policies for requesting leave/reporting absences. Failure to provide such notice may be grounds for delaying or denying FMLA Leave.

Requests for FMLA Leave should be submitted to the Human Resources Department using the applicable forms. When submitting a request for FMLA Leave, the team member must provide sufficient information for the company to determine if the leave qualifies as FMLA; provide information on the anticipated date when the FMLA Leave would commence and the duration of the FMLA Leave. Team members may also have to provide certification and periodic recertification supporting the need for FMLA Leave.

EMPLOYER RESPONSIBILITIES

When a team member requests FMLA Leave, the company will inform the team member whether he or she is eligible under the FMLA guidelines. If the team member is eligible for FMLA Leave, the team member will be given a written notice that includes all information he or she is required to provide and the amount of leave that will be counted against the team member's leave entitlement. If the team member is not eligible under the FMLA, the company will provide the team member with a written notice indicating the reason(s) for its determination.

MEDICAL CERTIFICATION

If the team member requests FMLA Leave due to the team member's own or to care for a covered family member's serious health condition, or a covered service member's injury or illness incurred on active duty, the team member and the healthcare provider must supply appropriate medical certification. Team members may obtain a Medical Certification Form from the Human Resources Department. If the team member provides at least a thirty-day notice of medical leave, he or she should provide the medical certification before leave begins.

Failure to provide requested medical certification in a timely manner may result in the delay or denial of FMLA Leave. NMAA, at its expense, may require an examination by a second healthcare provider designated by the company. If the second healthcare provider's opinion conflicts with the original medical certification, NMAA, at its expense, may require a third, mutually agreeable, healthcare provider to conduct an examination and provide a final and binding opinion.

REPORTING WHILE ON LEAVE

If a team member takes leave because of the team member's own serious health condition or to care for a covered family member's serious health condition or a covered service member's injury or illness incurred on active duty, the team member will be required to furnish NMAA with periodic reports regarding the status of the condition and intention to return to work. In addition, the team member must give notice as soon as possible if the dates of the FMLA Leave change.

RETURN AFTER FMLA LEAVE

Team members who take no more than the amount of FMLA Leave permitted under this policy will be restored to the position held when the leave commenced or to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment.

FITNESS FOR DUTY CERTIFICATION

If FMLA Leave is for the team member's own serious health condition, the team member may be required to present a fitness-for-duty certificate from his/her healthcare provider before the team member is permitted to return to work.

EXEMPTION FOR HIGHLY COMPENSATED TEAM MEMBERS

Highly compensated team members (salaried FMLA-eligible employees, who are among the highest paid ten percent of all the company's employees employed within a seventy-five-mile radius) may not be returned to their former or an equivalent position following FMLA Leave if restoration of employment will cause substantial and grievous economic injury to NMAA. In such cases, NMAA will provide written notice to the team member of the intent to deny restoration on such basis at the time NMAA determines that a substantial and grievous economic injury would occur. For more information, please contact the Human Resources Department.

INDIANA MILITARY FAMILY LEAVE

In accordance with Indiana's Military Family Leave Act, the company provides leave to eligible family members of individuals on active duty in the United States Armed Forces or the Indiana Army or Air National Guard. "Active duty" means full-time service on active-duty orders for a period of at least 90 consecutive calendar days.

1. ELIGIBILITY

Eligible employees include the following relatives of the individual on active duty:

- a) spouse;
- b) parent (by blood, adoption, foster placement, or step-relationship);
- c) court-appointed guardian or custodian;
- d) grandparent (by blood, adoption, foster placement, or step-relationship);
- e) sibling (by blood, adoption, foster placement, or step-relationship); or
- f) child (by blood, adoption, foster placement, or step-relationship).

To be eligible for Military Family Leave, an employee

- a) must have been employed by the company for at least 12 months and
- b) must have worked at least 1,500 hours during the 12-month period immediately preceding the date that the leave is to begin.

2. LEAVE ENTITLEMENT

Eligible employees may take up to 10 days off work per calendar year as Military Family Leave. Leave can be taken during:

- a) 30 days before active-duty orders are in effect;
- b) during a leave provided to the one on active duty while the active-duty orders are in effect; and
- c) 30 days after the termination of the active-duty orders.

3. NOTIFICATION REQUIREMENTS

Employees must make a written request for Military Family Leave to Human Resources and provide a copy of active-duty orders, if available, before taking leave. This request must be made at least 30 days before the date the requested leave is to begin unless the active-duty orders are issued fewer than 30 days before the date the requested leave is to begin.

4. SUBSTITUTION OF PAID LEAVE

Generally, Military Family Leave is unpaid. If, however, an employee also has accrued paid time off and if the employee's leave request meets the requirements to use that paid time off, the employee will receive paid time off while on Military Family Leave. However, employees may not request or use any paid medical, sick, or disability benefit while on Military Family Leave.

5. CONTINUATION OF BENEFITS

The company will maintain an employee's coverage under its Health Plan on the same conditions during Military Family Leave as if the employee had been employed continuously during the leave period. An employee who wishes to continue health coverage must continue to pay his share of the premiums during the leave period to maintain coverage.

6. JOB RESTORATION/NO RETALIATION

Upon return from Military Family Leave, employees will generally be restored to their position. No action will be taken against an employee because of the use of Military Family Leave. If, during the leave, an event occurs that would have changed or even eliminated the employee's job had he not taken leave, the employee will have no greater rights than if he had been continuously employed during the leave.

JURY OR WITNESS DUTY

Immediately upon receiving your summons to serve, advise your supervisor and provide a copy of the official jury duty summons. All team members summoned for jury duty will be excused from work. NMAA reserves the right to request that the court excuse a team member from consideration for jury duty at times when business necessity or other exceptional circumstances exist.

Upon submission of appropriate documentation, which verifies the number of days served, a non-exempt team member will receive the difference between jury duty payment and their regular hourly rate of pay for all scheduled work hours that are lost because of jury service. Payment will be limited to ten regular workdays of pay in a calendar year for non-exempt team members. You are expected to report to work whenever the court schedule permits. Jury duty hours will not count toward the calculation of overtime. Non-exempt team members will not be compensated for the time spent as witnesses. See the Human Resources Department for details.

Exempt team members will receive their normal salary for partial workweeks in which they perform jury or witness duty, offset by any amount received as jury or witness fees. Exempt team members must present proof of the amount of jury or witness pay received. An exempt team member who misses up to two full workweeks for jury or witness service in a calendar year will be paid the normal salary, less any jury or witness fees received, but additional full workweeks of jury or witness service will be without pay.

BEREAVEMENT LEAVE

Regular full-time team members who have been employed by NMAA for a consecutive ninety-calendar day period will be eligible for paid bereavement leave. Bereavement leave benefits will be paid at the team member's regular hourly rate of pay for each workday missed during the bereavement period. Please contact your supervisor and the Human Resources Department to arrange for the necessary time off with pay.

If a death occurs in a team member's immediate family, excused time off with pay will be provided up to three consecutive regularly scheduled workdays. Immediate family is defined as a team member's spouse, child, parent, brother/sister, grandparent, grandchild; in-law including son/daughter and mother/father, and step relationship including child, parent, brother/sister, grandparent/grandchild.

If the team member has not been employed by NMAA for a consecutive ninety calendar day period and a death of an immediate family member occurs, you may be granted personal leave, without pay, pending approval of the supervisor or the Human Resources Department.

Should additional travel or bereavement time be needed, you may be granted personal leave of absence, without pay, upon approval of your supervisor and the Human Resources Department. NMAA will strive to exercise the greatest degree of understanding, and we anticipate that you will use good judgment in such situations. NMAA reserves the right to verify relationship and occurrence of events regarding the bereavement leave request.

FUNERAL LEAVE

In situations that do not meet the requirements for paid bereavement leave, team members may request funeral leave. Funeral leave will only be available for the day of the funeral. To avoid attendance infractions, team members will need to use available paid leave such as vacation or PTO to cover funeral leave.

UNEMPLOYMENT INSURANCE

Amounts are paid by NMAA to the Federal and State Governments to fund the provisions of unemployment benefits to former team members. Team members may be eligible for unemployment benefits upon termination of service with NMAA, depending on state law and the circumstances connected with the termination.

EMPLOYEE ASSISTANCE PROGRAM (EAP)

WHERE DO I GO IF I NEED HELP?

NMAA recognizes that all team members experience problems of a personal nature during their lives, whether it is related to personal health or a family member's health, finances, emotional disturbances, or substance abuse. Sometimes we can manage these problems ourselves, but there may be times in which professional intervention is necessary. Without treatment, these problems can affect family relationships, job performance, attendance, and workplace relationships.

Because we are concerned with the performance and well-being of all team members, NMAA has established an Employee Assistance Program (EAP). The EAP is designed to provide team members and their dependents with a confidential, experienced source of help.

WHO IS ELIGIBLE TO USE THE EAP?

All team members and their dependents may participate in the EAP. There is no cost for the team member or family members unless he/she is referred to another agency for specialized or additional services. There is no cost for a team member to consult with an EAP counselor. If further counseling is necessary, the EAP counselor will outline community and private services available. The counselor will also let team members know whether any costs associated with private services may be covered by their health insurance plan. Costs that are not covered are the responsibility of the team member.

WILL ANYONE AT WORK KNOW I'M USING THE EAP?

A key element of the EAP is confidentiality. Through the Employee Assistance Program (EAP), NMAA provides confidential access to professional counseling services. The EAP, available to all team members and their dependents, offers problem assessment, short-term counseling and referral to appropriate community and private services. Regardless of the referral method, interaction with the local EAP coordinator will be held in absolute confidence. The EAP is strictly confidential and is designed to safeguard a team member's privacy and rights. Contacts to and information given to the EAP counselor may be released to NMAA only if requested by the team member in writing.

HOW DOES THE EAP WORK?

You may volunteer to use the local EAP provider or be directed to do so by the Human Resources Department. The primary function of the EAP is to assist people who need help with their personal problems. When you contact the EAP, a staff member will assess your problem and advise you of the available alternatives for treatment, counseling, or other help. When you initiate a request for assistance, you are under no obligation to pursue any course of professional help that you do not wish to follow. If you are referred to the EAP because of performance or disciplinary issues, your participation may be a condition of continued employment. Your involvement with the EAP does not absolve you from disciplinary action if a performance issue exists.

HOW CAN THE EAP HELP?

The treatment staff of the EAP consists of professionals who are credentialed counselors who can help with a variety of problems. These counselors also have additional specialized training in crisis intervention and chemical dependency. They provide a confidential referral service for team members who may be troubled by and need counseling for such problems as:

- Marital or relationship problems
- Parenting issues
- Child/Adolescent issues
- Coping with serious health issues
- Mental health and substance abuse
- Depression/Stress management

401(k) RETIREMENT/SAVINGS PLAN

All eligible full-time NMAA team members may participate in the Nikkei MC Aluminum America, Inc. 401(k) Retirement Plan. Team members who have been actively employed full-time by NMAA for a consecutive ninety-calendar day period are eligible. The Nikkei MC Aluminum America, Inc. 401(k) Retirement Plan allows you to make tax-deferred voluntary contributions to the Plan, in accordance with the Internal Revenue Service regulations.

Through payroll deductions, you can make elective deferrals up to the maximum allowed by law. The Plan provides for discretionary matching contribution on elective deferrals in an amount to be determined by NMAA on an annual basis.

If you do not make a deferral election prior to your eligibility date, an automatic deferral amount of 3% of your compensation will be withheld from your pay. This amount will be contributed as pre-tax contributions to the Plan. If you do not wish to have automatic deferrals withheld or you would like to change the amount withheld, you must make a deferral election. If automatic deferrals have already started, you may make a deferral election to change the amount or to stop the deferrals entirely.

For additional information, contact the Human Resources Department.

HOLIDAYS

NMAA generally provides nine paid holidays per year. The basic list of observed holidays is as follows:

New Year's Day (January 1)
Good Friday (Friday before Easter Sunday)
Memorial Day (Last Monday in May)
Independence Day (July 4)
Labor Day (First Monday in September)
Thanksgiving Day (Fourth Thursday in November)
Day after Thanksgiving
Christmas Eve (December 24)
Christmas Day (December 25)

An annual holiday schedule listing the observed holidays will be published and posted before the beginning of each calendar year.

To qualify for holiday pay, team members must meet the following guidelines:

- Team members are eligible for holiday pay immediately upon hire. Holiday pay will be calculated based on the team member's normal shift hours and base pay rate as of the date of the observed holiday.
- Team members will receive holiday pay if they work the entire scheduled work shift immediately before and after the holiday.
- Team members will receive holiday pay if the absence before or after the holiday is covered by approved leave including vacation, PTO (excused), jury duty, bereavement leave, military leave, or any paid medical leave. Team members on leave of absence or layoff are not eligible to receive holiday pay when the holiday falls during the leave period.

- Team members who work on a recognized holiday will receive holiday pay plus their regular pay for the actual hours worked. (overtime rates may apply)
If the team member works more than their normal shift hours, they will receive holiday pay for the actual number of hours worked.
- For those who work a Monday – Friday schedule, a recognized holiday that falls on a Saturday will be observed on the preceding Friday. A recognized holiday that falls on a Sunday will be observed on the following Monday.
- Team members may observe an adjusted holiday schedule based on their assigned shift and/or department.

VACATION POLICY

NMAA believes that time off from work for rest and relaxation is essential to a team member’s personal health and family life. Although vacation time is earned by team members, due to certain business requirements, some provisions must be placed on when vacation time is to be used. This policy outlines how the vacation benefit will be administered.

Non-Exempt (Hourly) Team Members

Full-time team members of NMAA are eligible to use paid vacation based upon a scheduled length of service. Team members may not use paid vacation until they have completed at least one year of continuous service. After completion of at least one year of continuous service, the annual vacation allowance will be awarded as of the team member’s employment anniversary date. Part-time team members are not eligible for paid vacation.

The company has established the following vacation plan. (See chart below)

<u>Service Length (Years Completed)</u>	<u>Vacation Hours Earned</u>
One	40 hours
Two	80 hours
Five	120 hours
Seven	128 hours
Nine	136 hours
Eleven	144 hours
Thirteen	152 hours
Fifteen	160 hours

Note: In the event you work beyond 15 years of service, you will continue to earn an additional eight hours for every two additional years worked for the duration of your employment. Vacation credit will not be earned if a team member is on a leave of absence for more than two months.

Using Vacation Time:

Vacation may be taken at any time of the year; however, some eligible vacation may need to be scheduled to coincide with a plant shutdown as described below. Due to the number of hours worked on various shifts at NMAA, team members may use vacation in a minimum of two (2) hours.

Scheduling Vacation Time:

Vacations are to be scheduled within the twelve months immediately following the team member's anniversary date. Vacation requests must be pre-approved by the supervisor/manager. Request forms are available through Human Resources. Exceptions to scheduling vacations by the policy may be considered but will require approval from the Human Resources Department.

Holidays During Vacation:

If an NMAA holiday occurs during a team member's vacation, the day will not be charged as vacation time. However, if the holiday is considered a regular scheduled workday, not "fire watch," a vacation request must be submitted and approved to be considered an excused absence. In this situation, the team member would receive both holiday and vacation pay.

Vacation preference will be assigned on a first-come, first-served basis. If two or more team members, on the same shift, request the same vacation period and this condition would disrupt business operations, the priority will be determined on a first-come, first-served basis. However, if two or more vacation requests are submitted on the same date, for the same period and shift, length of service will be the deciding factor. Your supervisor will try to accommodate all requests that do not hinder the normal operating efficiency of the department.

Carry-over of Vacation Time:

Vacation must be taken within the twelve months following the team member's anniversary date. Team members may not accumulate or carry-over vacation from year-to-year.

Plant Shutdowns:

NMAA may, on occasion, need to schedule shutdowns to perform maintenance that cannot be completed during normal operations. A period of temporary shutdown or low production may be designated as a vacation period.

Vacation Pay:

Team members will receive their current hourly base rate for all vacation hours. Shift differential and other premium pay will not be included in this calculation. Vacation is recorded on the team member's regular time sheet and distributed on the normal payday for that period.

Vacation Buy-back:

Team members are encouraged to use their vacation allowance for periods of rest and relaxation. As stated earlier, unused vacation time is not to be carried over from year-to-year. If eligible, all team members are required to take at least one week (40 hours) of their available vacation. Additional earned vacation hours may be sold back to the company at the team member's request. The vacation buy-back will be calculated at the team member's hourly base rate of pay at the time of the buy-back. Payment for unused earned vacation (previous year) will be processed as soon as reasonably possible.

Vacation Pay at Termination of Employment:

Any vacation time earned but unused at the time of separation from employment will be paid to the team member.

Exempt (Salary) Team Members

For salaried exempt team members, the vacation period is the calendar year beginning January 1 and continuing through December 31. As used in this policy, "month" and "year" mean full calendar periods. Also, the term "service" refers to regular employment and excludes part-time and temporary workers.

Exempt team members earn vacation hours monthly for the current calendar year. Hours earned in a calendar year must be used during the current calendar year. No earned vacation from the current year will be allowed to carry-over to the next calendar year.

Exempt team members will be permitted to use vacation time before it is earned, limited to the hours available to be earned during the current year. The vacation allowance will be prorated during the first calendar year of employment. Generally, exempt team members will be eligible for vacation time as outlined in the schedule below.

<u>Service Length (Years Completed)</u>	<u>Vacation Hours Earned</u>
<1 – 4	80 hours
5 – 6	120 hours
7 – 8	128 hours
9 – 10	136 hours
11 – 12	144 hours
13 – 14	152 hours
15 – 16	160 hours

Note: In the event you work beyond 15 years of service, you will continue to earn an additional eight hours for every two additional years worked for the duration of your employment.

Using Vacation Time:

Vacation may be taken at any time of the year; however, some eligible vacation may need to be scheduled to coincide with a plant shutdown as described below. Due to the number of hours worked on various shifts here at NMAA, team members may use vacation in a minimum of two (2) hours.

Carry-over of Vacation Time:

Vacation must be taken during the calendar year in which it is earned. Team members may not carry over vacation from year-to-year.

Scheduling Vacation Time:

Vacations are to be scheduled within the twelve (12) months of the current calendar year. All vacation requests are subject to the approval of the immediate supervisor/manager. Requests should be submitted for approval through the automated timekeeping system.

Holidays During Vacation:

Should a paid holiday occur during a team member's vacation, the day will not be charged as vacation.

Plant Shutdowns:

NMAA may, on occasion, need to schedule shutdowns to perform maintenance that cannot be completed during normal operations. A period of temporary shutdown or low production may be designated as a vacation period.

Vacation Pay:

Exempt team members will receive vacation pay calculated using their normal base salary for all vacation hours taken or sold back to the company.

Vacation Buy-back:

Team members are encouraged to use their vacation allowance for periods of rest and relaxation. As stated earlier, unused vacation time is not to be carried over from year-to-year. If eligible, all team members are required to take at least one week (40 hours) of their vacation. Additional vacation hours may be sold back to the company at the end of the year. Payment for unused vacation (previous calendar year) will be processed as soon as reasonably possible.

Vacation Pay at Termination of Employment:

Any vacation time earned but unused at the time of separation from employment will be paid to the team member.

Vacation Hours Earned					
Last Day Worked Before:	2 weeks	2 1/2 Weeks	3 Weeks	3 1/2 Weeks	4 Weeks
31-Jan	0	0	0	0	0
28 (29)-Feb	6.67	8.33	10.00	11.67	13.33
31-Mar	13.33	16.67	20.00	23.33	26.67
30-Apr	20.00	25.00	30.00	35.00	40.00
31-May	26.67	33.33	40.00	46.67	53.33
30-Jun	33.33	41.67	50.00	58.33	66.67
31-Jul	40.00	50.00	60.00	70.00	80.00
31-Aug	46.67	58.33	70.00	81.67	93.33
30-Sep	53.33	66.67	80.00	93.33	106.67
31-Oct	60.00	75.00	90.00	105.00	120.00
30-Nov	66.67	83.33	100.00	116.67	133.33
31-Dec	73.33	91.67	110.00	128.33	146.67

Note: Hours earned for vacation allowances greater than four weeks will be calculated accordingly.

TUITION ASSISTANCE PROGRAM

NMAA recognizes that the skills and knowledge of its team members are critical to the success of the organization. The Tuition Assistance Program encourages personal development through formal education so that team members can maintain and improve job-related skills or enhance their knowledge in an area which could be of mutual benefit to both the team member and NMAA.

NMAA will provide tuition assistance to all eligible team members who have completed at least one consecutive year of service. To be eligible, team members must remain on active payroll and maintain acceptable job performance through completion of each course. To qualify for reimbursement, NMAA must approve the course(s) in advance of the first day of class. Team members must also receive a passing grade equivalent of "C" or higher. Note that this program does not cover the cost of books, supplies or fees required to complete the course(s).

Approved courses must be offered through an accredited college or university. Individual courses or courses that are part of a degree, licensing, or certification program must be related to the team member's current job duties or have a potential future benefit to the organization to be eligible for tuition reimbursement. NMAA has the sole discretion to determine whether a course relates to a team member's current job duties or a foreseeable future benefit. Team members should contact the Human Resources Department with questions.

While tuition assistance is expected to enhance team member performance and professional abilities, NMAA cannot guarantee that participation in formal education will entitle the team member to automatic advancement, a different job assignment, or a pay increase.

WORKERS' COMPENSATION

Work-related injuries and occupational illnesses are governed by the State of Indiana's Workers' Compensation laws as applicable and are covered by insurance provided by NMAA. This program is designed to provide expedient administration of Workers' Compensation medical and disability benefits to all team members sustaining occupational injury or illness.

If you are injured while working, no matter how slight the injury is, you must report it promptly to your supervisor. You must report the injury so proper treatment may be given, and documentation can be filed, within the deadlines required by law, with the governmental departments that have authority over Workers' Compensation claims. Failure to report a job-related injury or illness may exclude you from eligibility for Workers' Compensation benefits and may result in disciplinary action, up to and including termination of employment.

Unless there is an emergency, do not go to the doctor on your own without first reporting the injury or illness to your supervisor and receiving approval to do so.

Indiana Workers' Compensation laws provide that if an injury is caused by willful failure to use safety devices, by failure to obey any reasonable rule adopted by the employer, or by failure to obey any rule or policy relating to the use of alcohol or non-prescribed controlled drugs in the workplace, the compensation and death benefit provided by the Workers' Compensation statute may be reduced and/or be denied.

If it qualifies under the Family and Medical Leave Policy, any leave taken pursuant to an injury covered by the Indiana Workers' Compensation Act will run concurrently with unpaid FMLA Leave.

VII. TEAM MEMBER HEALTH, SAFETY AND SECURITY

THE ROLE OF SAFETY AT NMAA *SAFETY FIRST*

Safety and accident prevention is, and will remain, a top priority at NMAA. Safety is the responsibility of all team members, and everyone is expected to be actively involved in making our workplace as safe as possible. We consider common sense the essence of health and safety and recognize that it is impossible for us to formulate rules to anticipate every possible occurrence. Each team member is expected to obey safety rules and to exercise caution in all work activities. Keeping *Safety First* is a top priority for all team members.

It is NMAA's policy to provide safe working conditions for all team members, to provide complete instructions concerning safe working methods, and to make available the safety equipment required to protect team members against all recognized hazards. It is the obligation of each team member to observe and adhere to the safety regulations. Team members must always use the safety equipment provided and follow safety guidelines. .

These safety rules have been developed to protect you and your fellow team members. In addition, safety procedures have been designed into our production equipment to ensure the safety of our team members and the proper operation of the equipment. If you don't understand a safety rule or procedure, check with your supervisor before starting the job. **Any team member who fails to follow any safety policy or procedure, including the policy requiring immediate notification of any work-related injury, will be subject to disciplinary action, up to and including termination of employment.**

We want everyone to be safety conscious. If you notice an unsafe practice or condition, inform your supervisor immediately. Your suggestion may prevent a future injury to yourself or to a fellow team member.

SAFETY EDUCATION

Our safety goal at NMAA is to assure that all team members learn, develop and practice good safety habits so we can operate in an accident free environment. To reach this goal, we will provide various safety trainings and awareness programs on a continuing basis.

We will accomplish our goals through technical training that ensures all jobs are performed in a safe and efficient manner. As part of your job, you may be required to learn about such safety procedures as equipment lockout and tag out, chemical hazard communication, respiratory protection, fire safety and other education that may be required by law.

Other safety activities will also be a part of our overall safety program, including safety meetings in which all team members can discuss current safety topics in your area. We will also update our safety training as new equipment and materials become a part of NMAA's operation.

Team Member Accountability Program

Nikkei MC Aluminum America, Inc. has a responsibility to provide a safe working environment for our team members and make every reasonable effort to protect our team members from work-related injury or illness. To accomplish this, it is necessary that every team member have a stake in providing accountability toward meeting their responsibility to work safely and protect themselves and their fellow team members from injuries caused by their actions. NMAA has established a Supervisor Accountability Program, requiring supervisors to incorporate safety into their production procedures and goals. Their performance evaluations include these safety goals and documentation of safety related coaching and instruction along with the safe functioning of their crews and operations. It is now time to expand this accountability directly to the team member level, requiring each team member to include safety in their production efforts. This program details our expectations and means of accomplishing this goal.

Nikkei MC Aluminum America, Inc. Team Member Responsibilities

It shall be the responsibility of each team member to attend and complete all required safety training provided to them within a reasonable period of time. If you are absent during the time that safety training is provided, your supervisor will coordinate any necessary make up training.

Each team member will be responsible for understanding what Personal Protective Equipment is required for the operation(s) they are performing, the proper way to use that PPE and wearing that PPE as required. It will also be the team member's responsibility to maintain their PPE in a good and serviceable condition, or to promptly request replacement.

Each team member will be responsible for understanding and adhering to the company safety rules, procedures and policies. This includes, but is not limited to:

- Proper wearing of head, feet, hand, and eye protection
- Proper and safe use of ladders
- Proper and safe use of machinery and tools
- Following forklift safety rules
- Following safety rules for working around forklifts or other powered vehicles
- Proper material handling (includes use of equipment to lift heavy loads)
- Following lock out / tag out rules
- Following fire safety rules
- Maintaining a safe and clean work area
- Following welding and cutting safety rules and procedures
- Following cell phone protocols
- Following general rules regarding running, horseplay, fighting, etc.
- Following reporting requirements for injury and/or near miss incidents
- Following the company Drug Free Workplace policy

All team members are accountable for making safety a part of production; this includes temporary employees, full-time team members, part-time team members and supervisory team members. Failure to follow safety rules and policies will result in disciplinary action (*see Corrective Action Program*).

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Proper safety equipment for all team members will be provided by NMAA. Protective equipment, such as, hard-hat, hearing and eye protection, safety shoes, and any other equipment necessary to make working conditions safe will be made available whenever required. Personal protective equipment (PPE) must be worn as a condition of employment.

Throughout NMAA, there are processes that have the potential to cause an injury or death if the proper safety equipment is not worn. Types of PPE vary from job to job. They could include such things as safety glasses, steel-toed shoes or boots, helmets with face shields, etc. Requirements such as the mandatory use of safety glasses and steel-toed shoes or boots are a couple of the items that NMAA has declared as important parts of PPE. Please see your supervisor or a member of the Safety Department for a detailed list of the PPE required for each job.

Always remember that PPE cannot work if it is not worn. NMAA furnishes all necessary PPE free of charge, so there is no excuse for not wearing it. If you do not have the proper PPE to do the job, do not do the job until the PPE is furnished to you.

These are the main parts of our process that require PPE, but always remember that the list for PPE use is subject to change.

Designated Walkways, Ladle Truck Drivers, Receiving Office Personnel

Green Zone This designated walkway is our safest zone. Employees, customers, contractors and visitors are expected to use the designated walkways.

The designated walkway between the Plant Office and the First-Aid Room is considered a “no PPE” zone:

- PPE Requirements: None
- Food and/or drinks **are** allowed in this area

Ladle Trucks (Drivers only) and Receiving Office:

- Drinks/Snacks must be taken to these locations using a lunchbox/cooler; no open or visible containers allowed in the plant.
- Route of travel is directly to/from the south break room area only; no walking through other areas of the plant, through the yard, etc.
- Drivers are responsible for removing their trash/containers from the ladle trucks. Ladle trucks are to be kept clean at all times.

ACCIDENT/INCIDENT REPORTING

If an accident occurs, immediately cease work, stop running equipment, and notify the supervisor or General Manager of the accident/incident. No exceptions should be made to this rule. Never assume that the problem is not a major one and ignore it or attempt to fix it yourself. You should also be prepared to participate in accident investigations, upon request. Report near misses and hazardous conditions to your supervisor, who will collaborate with the General Manager to review the situation and recommend appropriate corrective action.

Notify your supervisor immediately whenever you are injured or feeling ill. Even very minor injuries may be aggravated or may become infected later. You should receive the proper medical attention immediately to avoid future problems. Property Damage/Incident and Accident reports are to be completed within twenty-four hours for every occurrence and submitted to the Human Resources Department and/or the Safety Coordinator.

GOOD HOUSEKEEPING

Good housekeeping is an important part of safety. It not only improves the appearance of the plant but also prevents accidents and personal injuries. Clean work areas, equipment and floors will enable you to maintain a high standard of quality in your work. NMAA relies on everyone to maintain a clean work environment.

TOBACCO USE

NMAA is committed to providing a safe and healthy workplace and to promoting the health and well-being of its team members. In accordance with state and local requirements, the use of tobacco products of any kind, including e-cigarettes, outside of designated areas is prohibited. This policy applies equally to all team members, customers, and visitors.

Tobacco use and smoking, including the use of electronic smoking/vapor devices, will be allowed in designated areas only. The use of tobacco is not permitted in the production areas, restrooms, break rooms, office areas, training room, or the entrance and exit areas. Indiana state law prohibits smoking within eight feet of all entrances.

The designated tobacco and smoking areas will be provided if they are maintained at an acceptable level.

TOBACCO USE GUIDELINES

- Smoking or tobacco use will be permitted only in the designated areas.
- A tobacco use and smoking area will be provided and will be available to team members for use during their normal break(s) and/or lunch break. Team members who use tobacco or smoke will not be permitted to take additional breaks beyond those normally provided.
- Team members who use the designated tobacco use and smoking area will be required to properly dispose of tobacco and smoking material (i.e., cigarette butts, cigars, etc.). This is to ensure that the tobacco and smoking area is maintained at an acceptable level.
- Any non-Nikkei individual violating this policy will be asked to immediately conform to the policy guidelines.
- Team members found violating this policy will be subject to corrective action.

Cigarette lighters are not permitted in the production areas because they may contain a pressurized highly flammable gas that can potentially explode when subjected to open flame or another source of heat.

EMERGENCY CONDITIONS/SEVERE WEATHER POLICY

NMAA management may authorize the closing of the facility or the curtailing of operations due to emergency conditions or severe weather.

In general, NMAA will only be closed if an emergency is declared for Bartholomew County, which involves closing of roads and highways with travel restricted to emergency personnel only. If an emergency is declared for the county in which the team member resides or must travel through where travel on roads is restricted to only emergency vehicles, that team member is not expected to report to work. In such situations, the team member must call into work using the normal procedures for reporting an absence.

The Indiana Department of Homeland Security has a website <http://www.in.gov/dhs/> that provides updates on the weather-related travel status of each county within the state of Indiana. We will consider Emergency Conditions/Severe Weather Policy in effect when Bartholomew County or an employee's county of residence or normal work travel is under "warning" status.

Subject to management approval, when this policy is in effect, employees may use their vacation, PTO, or take the day as unpaid leave and the absence(s) will not count against their attendance record.

The emergency conditions provisions for paid leave shall not apply to team members on medical leave or any other prior-approved leave.

EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW LAW

There is a Federal Emergency Planning and Community Right to Know Law that is important to all of us. It ensures that each of us knows of any hazardous materials that we may come in contact within our daily work. It is important that you fully understand the hazards associated with your job and take the precautions necessary to protect yourself and fellow team members.

VIII. STAYING INFORMED AT NMAA

DIRECT COMMUNICATION/OPEN DOOR POLICY

Communication is especially important in our process of production. It is our belief that you, as a team member of NMAA, are entitled to be well informed. To assure that this happens, we intend to maintain an ongoing and open communications program. At the same time, it is important to us that there is positive two-way communication.

NMAA encourages open lines of communication throughout the organization. NMAA's "Open Door" practice is designed to help keep information flowing freely throughout our organization. We encourage two-way communication by welcoming team member questions, opinions, and suggestions, also by exchanging information about matters of mutual interest and concern.

If you have concerns under the Equal Employment Opportunity, Anti-Discrimination/Harassment Prevention, or Non-Retaliation policies, you should report the concerns using the procedures specified in those policies. Otherwise, if you have a problem or concern that is related to your employment, whether it involves a policy or procedure, this Handbook, some statutory right, or any other employment-related matter, you should first take this matter to your supervisor. Between the two of you, nearly all problems or misunderstandings can be resolved. Should you have difficulty communicating with your supervisor, you are encouraged to contact any other member of management with whom you feel comfortable, including the Human Resources Department. This is a right we all share at NMAA.

Team Member complaints will be managed as quickly and confidentially as possible. If warranted, management may investigate to gather information pertinent to the complaint. NMAA will not discipline a team member for bringing or participating in a complaint or investigation unless the complaint was clearly brought in bad faith.

Remember that it is always our intent to communicate sincerely and honestly with each other. Please exercise this right and obligation.

SOLICITATION/DISTRIBUTION

Solicitation of any type and for any purpose shall not be permitted during working time. Working time does not include mealtimes, break periods or other times when team members are not scheduled to perform their job duties. You may not distribute literature (printed matter of any kind) during your scheduled work hours or in working areas at any time.

Non-team members are not permitted to solicit or distribute materials at any time on company property. It is not the intent of this policy to interfere with or restrict the distribution of work-related or training materials by supervisors, or any other member of management.

BULLETIN BOARDS

Bulletin boards are an important method of distributing information to our team members and are located in areas that are accessible to everyone. The Human Resource Department is responsible for distributing notices and information for all bulletin boards. No one should post or remove any notice or information from company bulletin boards without the advance approval of the Human Resources Manager. Bulletin boards may only be used for posting work-related company notices.

To stay informed we encourage each team member to check the bulletin boards daily for news that will be of interest to you. NMAA has the exclusive right to determine what material will be posted on the company bulletin boards. It is not the intent of this policy to interfere with or restrict the distribution of work-related or training materials by your supervisor or any member of management.

IX. MISCELLANEOUS INFORMATION

PARKING

The company will provide sufficient parking for all team members. Parking in designated parking areas is a privilege for team members, visitors, and authorized personnel in support of NMAA. All drivers should use proper care and caution while operating motor vehicles on company property.

Parking is available on a first-come, first-served basis and is only permitted in the designated parking areas. Areas designated by yellow curbs, hash marks, or those with no lines designating a space are not available for parking. Parking at loading docks and platforms shall be restricted to commercial and other service vehicles while in the process of loading or unloading.

NMAA will not be liable for any theft or damage caused to any vehicle, or contents therein, while parked in company provided areas.

Vehicles, including motorcycles, and bicycles cannot be stored in any spaces in the parking areas, except when a team member is traveling on official business or in similar circumstances. "Stored" is defined as being continuously parked for more than thirty consecutive days. A vehicle not displaying a valid license plate will also be considered a stored vehicle. All disabled vehicles should be moved within twenty-four hours unless special arrangements have been made with management.

HANDICAP PARKING

Handicap parking is available and conspicuously marked. All vehicles parking in these areas must display a handicap placard/plate. When vehicles are found parked in these spaces, without the proper permit, the local law enforcement will be notified and asked to ticket the vehicle. During these times, reasonable efforts will be made to identify and contact the person responsible for the vehicle, so it can be immediately moved. If the driver cannot be found or does not timely move the vehicle, the vehicle is subject to towing at the owner's expense.

VISITOR PARKING

Visitor parking is located near the main entrance to the facility and is marked with signs designating these spaces for visitors. Because of the number of visitors to the facility, team members are not permitted to park in the visitor spaces at any time.

PARKING VIOLATIONS

Violations include, but are not limited to:

- Failure to display the proper identification (valid license plate)
- Failure to park in designated areas
- Failure to park within marked parking spaces
- Unauthorized parking in reserved spaces
- Storing a vehicle in designated parking areas
- Parking on grass, sidewalk, or curb
- Parking where signs prohibit or restrict
- Parking in a fire lane
- Blocking entrance/exit
- Unauthorized parking in loading/unloading zones

DISCIPLINARY ACTION

Team members found to be in violation of any part of the parking policy will be subject to disciplinary action as outlined in the handbook. (*See Corrective Action Program*)

TOWING

Unauthorized vehicles parked in handicap spaces, blocking fire lanes, roadways and shipping areas, or vehicles associated with three or more parking violations may be towed at the owner's expense. The vehicle's owner will be responsible for any towing and/or impounding expense. If a vehicle is towed, the local police will be notified identifying the vehicle, owner's name, and where it has been towed. In certain situations, the vehicle may be towed without notice to the owner.

LOCKERS/STORAGE SPACES

Personal lockers will be made available for NMAA team members' use. If you wish to lock a locker to secure your personal belongings, you must provide your own lock. NMAA cannot be responsible for anything destroyed, lost, or stolen from the lockers. Although lockers/desks may be used to store personal property, there is no expectation of privacy. Company provided storage spaces (desks, lockers, etc.) are the property of NMAA and we reserve the right to inspect the contents at any time for any reason.

LUNCH/BREAK ROOM

NMAA provides a meal and break area with vending machine food service. Microwaves and a refrigerator are available for use, and it is expected that this area be kept clean and neat. Please help us keep the break room clean by clearing all trash when finished.

LOST AND FOUND

Any items found by NMAA team members should be delivered to the Human Resource Department where the items will be kept in a secure location for up to sixty days until they are claimed.

If the item contains identification, such as a name, phone number or address, we will make every effort to contact the individual as soon as possible. To ensure lost items are returned to the rightful owners, persons claiming items must first describe the item(s) as closely as possible and provide identification.

DISPOSING OF UNCLAIMED ITEMS

- Unclaimed cash, or other items of value may be returned to the finder or taken to a local thrift store deposit location.
- Cellular phones will be donated to a non-profit organization that has a donation program.
- Prescription eyeglasses/sunglasses will be donated to a local eyeglass recycling program.
- Unidentifiable keys will be discarded.
- Damaged or perishable items will be discarded.

PERSONAL PHONE CALLS/GUESTS

Due to the production schedule, team members will not be removed from their production duties to accept a telephone call or receive guests. Please ask your family and friends to telephone or visit only in case of an emergency. An emergency, which affects you, will be routed immediately through your supervisor. If you must make an emergency personal telephone call during non-break working hours, promptly notify your supervisor who will make arrangements for you. Any use of a company phone for personal calls, while on lunch or break should be approved by your supervisor and must be kept to a minimum.

X. YOUR RESPONSIBILITIES/GUIDELINES

TEAM MEMBER'S ROLE AND RESPONSIBILITY

As stated in our Team Member Relations Philosophy in the introduction to this Handbook, team members will be treated as mature and responsible adults who deserve the full respect and trust of the company and fellow team members.

As our most valuable asset, team members are expected to always give their best effort and to alert their supervisor of potential production, quality, safety, or other problems.

Team members are also encouraged to take part in developing and designing new ways of doing their work in our program of continuous improvement. Team members should always look for opportunities to increase their effectiveness in working as a group to solve problems.

Team members are expected to come to work on time, produce an established quantity of quality products, maintain good housekeeping in their work area, and avoid disruption of the workflow while practicing good safety habits.

It is always our sincere intent to be fair and reasonable with all team members. From time to time, questions may arise about the application of policies and procedures and differences of opinion may occur.

It is our desire that team members bring their problems to the attention of the company as soon as possible, as outlined in the Direct Communication/Open Door Policy (See Section VIII). In this way, appropriate action may be taken promptly.

SUPERVISOR'S ROLE

Supervisors provide guidance and are expected to set a good example for their team members and function as a sort of "team captain" similar to sports teams.

Supervisors must be able to supervise (ex: a production shift) operations to meet scheduled production requirements. The supervisor is expected to direct, train and manage team members assigned to the shift and to ensure compliance with all associated company policies and procedures.

NMAA TRAINING

IMPORTANCE OF CROSS-TRAINED TEAM MEMBERS

NMAA believes in the need to orient, train, and develop all team members on an ongoing basis. Such training will increase our flexibility.

NMAA will train you to perform multiple tasks that will allow us to remain flexible in meeting customer requirements and promote your job security. One way to increase our flexibility is through job cross-training. Team members will be trained in additional tasks after they have mastered their initial job assignment.

Team members will also rotate to different job assignments within their department. There may also be instances when team members are moved to different work assignments on a temporary or permanent basis in other areas or shifts of the plant. These job movements will be based on the need for increased production requirements and improved efficiency of our operation. This personnel movement will result in a better overall production process and will promote your job security at NMAA.

TRAINING AND DEVELOPMENT

From time to time, NMAA provides or sponsors in-house programs for job-related skills training and teamwork development. Additionally, programs will be provided that allow for team members to be fully trained in all areas, including safety, leadership, communication, etcetera.

PERFORMANCE GUIDELINES

We expect our team members to accept the responsibility of conducting themselves in such a way as to promote the orderly and efficient operation of the business and to preserve the rights and safety of all other team members.

All team members are expected to use good judgment and take responsibility for their actions and conduct. We believe that as an NMAA team member you will respond to the following guidelines in a positive manner consistent with the spirit in which they were written:

- Support team performance and your fellow team members.
- Help to meet team goals and participate in team activities.
- Adhere to NMAA policies, practices, and procedures.
- Promote continuous improvement each working day.
- Work toward quality goals and improve quality standards and correct all improper workmanship where possible.
- Assist in attaining NMAA production goals and schedules.
- Treat each NMAA coworker with dignity and respect.
- Be honest with fellow team members and NMAA.
- Perform all your responsibilities sincerely.
- Maintain a safe work environment and practice good housekeeping.
- Come to work on time and give your best each day.

CORRECTIVE ACTION PROGRAM

It is expected that all team members will perform their normal tasks in a professional manner. As with any employment expectation, there may be times when a team member's action does not meet generally accepted performance.

The intention of the NMAA Corrective Action Program is to provide all team members with a way to address performance problems that is fair and consistent. It allows our managers to take into consideration individual issues surrounding the incident while still providing a method for controlling incidents to help maintain efficient operation.

The objectives of the Corrective Action Program are the following:

1. encourage proper conduct;
2. ensure that any corrective measure is treated consistently and objectively; and
3. reduce efficiency problems due to unacceptable conduct.

Poor conduct disrupts production, hinders daily and long-range planning, and makes it difficult for NMAA to function effectively. Having our team members on the job performing their daily tasks is one of the most critical factors in the success of our business.

In dealing with performance problems, NMAA will ordinarily follow the corrective action steps that are outlined below; however, it is not likely that these steps will be followed in the case of newly hired individuals during the first ninety calendar days of employment with the company. NMAA retains the right, in its sole discretion, to bypass any of these steps or to otherwise deviate from the procedures set forth in this program as circumstances warrant for any team member. Nothing contained in this Handbook shall be construed to guarantee a team member the right to be disciplined in a progressive manner. If warranted by the circumstances, disciplinary action, up to and including termination of employment, may be imposed immediately, notwithstanding the foregoing policy.

CORRECTIVE ACTION PROCEDURE

Corrective action is meant to address performance and behavior that is deemed unacceptable by the company. The corrective action steps below may be utilized; however, depending on the severity of violation, the company may start a team member's corrective action at any step of the process and, in some cases, may require an immediate termination.

As a general guideline, NMAA's disciplinary steps process may include a verbal warning, written warning, final written warning, suspension, or termination. However, as previously mentioned, the corrective action may start at any step, depending on the severity of the situation.

- **Verbal Warning:** A verbal warning may be used as a first step for any violations and may consist of a documented verbal counseling. The purpose of a verbal warning is to eliminate any misunderstanding concerning the rules and policies; state clearly what behavior/performance is expected in the future; communicate the consequences of a future infraction; and document the fact that the counseling occurred.
- **Written Warning:** A written warning may be issued directly to a team member as the second step in the progressive discipline process or as a first step when deemed appropriate by the company. If a team member fails to correct a problem of personal conduct after a verbal warning, or if the problem warrants more serious treatment than a verbal warning, the team member will be issued a written warning. A written warning should clearly state the precise nature of the violation and warn that future violations will result in further disciplinary actions, including discharge.
- **Final Written Warning:** A final written warning may be provided as a final attempt at counseling a team member, prior to discharge. It may be provided after repeat violations have occurred or may be issued immediately after any misconduct if the company determines a final warning is warranted.
- **Suspension Without Pay:** A suspension without pay may be issued to address serious misconduct, violations of policies, procedures, or practices. Disciplinary suspensions may also be used when verbal or written warnings have not corrected deficient performance or behavior or when a more severe disciplinary action is warranted in the first instance.
- **Termination:** Termination is not a level of discipline the company chooses easily. Instead, NMAA hopes that its team members recognize the importance of proper conduct, thus removing the need for termination. Nevertheless, termination is always a disciplinary option, even for a first offense.

Note: A Final Written Warning and Suspension constitute the same level of discipline. Depending on the nature of the offense, termination of employment usually follows either of these disciplinary actions.

SERIOUS MISCONDUCT

There are certain acts of misconduct, such as alcohol or drug intoxication, gross insubordination, fighting or making threats, theft, falsification of records, disclosure of confidential or trade secret information, violation of the harassment policy, etc. -- that are by their nature, so serious that it places the team member outside the realm of our Corrective Action Program. The foregoing list is not exhaustive.

When a team member commits an act of this nature, the following procedure will usually be followed:

1. Immediate Suspension without pay, pending investigation
2. Investigation
3. Determination of final action
4. Implementation of final action

Unless the investigation reveals information management deems to be sufficient mitigating circumstances, team members who engage in serious misconduct should expect that their employment with NMAA will be terminated immediately.

TELEPHONE NUMBERS

Important Phone Numbers

Nikkei MC Aluminum America, Inc.	812-342-1141
Absence Call-in Mailbox	812-342-1141 x 155
After-Hours Operator	812-342-1141 x 150

Benefit Contacts

Enkei Care Center	812-373-6488
UMR Medical Employee Customer Service	877-814-8970
TrueScripts	844-257-1955
ElectRx Mail Order Prescription Savings	855-353-2879
Telehealth/Teledoc	800-835-2362
Guardian Dental	800-541-7846
Guardian Vision	877-814-8970
First Financial Bank (Health Savings Account Life and AD&D Insurance (Guardian))	877-322-9530 800-525-4242
Guardian Disability Insurance	800-268-2525
AFLAC Representative	317-752-8212
Employee Assistance Program (Guardian)	800-386-7055

Executive Team

President	812-342-1141 x 163
Senior Vice President & Plant Manager	812-342-1141 x 123

Human Resources

General Manager Human Resources	812-342-1141 x 134
Administrative Assistant	812-342-1141 x 125

Compliance

General Manager Compliance	812-342-1141 x 149
Safety Coordinator	812-342-1141 x 151

Accounting

General Manager Finance/Treasury	812-342-1141 x 162
Accounting Manager	812-342-1141 x 135
Accountant	812-342-1141 x 156

Sales / Purchasing / Shipping

GM Sales/Purchasing/Shipping	812-342-1141 x 113
Sales Manager	812-342-1141 x 116
Assistant Buyer/Purchasing Agent	812-342-1141 x 131
Sales Representative	812-342-1141 x 171
Shipping and Receiving Clerk	812-342-1141 x 127
Scale Attendant	812-342-1141 x 140

Production Administration Receiving

Receiving Manager	812-342-1141 x 168
Data Processing Specialist	812-342-1141 x 128

Production

Production Manager	812-342-1141 x 168
Assistant Production Manager	812-342-1141 x 176
A Shift Supervisor	812-342-1141 x 145
B Shift Supervisor	812-342-1141 x 148
C Shift Supervisor	812-342-1141 x 146
D Shift Supervisor	812-342-1141 x 147

CONTINUED

Rooms

No.1 & No.2 Cast Lines	812-342-1141 x 133
A Furnace	812-342-1141 x 112
Chip Dryer #2	812-342-1141 x 130
Docks 4 & 5	812-342-1141 x 129
B Furnace	812-342-1141 x 138
C Furnace East	812-342-1141 x 173
C Furnace South	812-342-1141 x 141
C Furnace West	812-342-1141 x 172
HR/Admin Conference Room	812-342-1141 x 136
Receiving Office	812-342-1141 x 140
Large Conference Room	812-342-1141 x 165
Maintenance Shop	812-342-1141 x 177
North Break Room	812-342-1141 x 114
Plant Office Conference Room	812-342-1141 x 118
Production Supervisor Office	812-342-1141 x 119
Quality Control Lab	812-342-1141 x 144
Quality Technician (Desk 1)	812-342-1141 x 132
Quality Technician (Desk 2)	812-342-1141 x 144
South First Aid Room	812-342-1141 x 143
Training Conference Room	812-342-1141 x 115
Warehouse	812-342-1141 x 122
Shredder Room (West)	812-342-1141 x 174
Shredder Room (North)	812-342-1141 x 175

Engineering

Plant Engineer	812-342-1141 x 153
Associate Engineer	812-342-1141 x 154

Maintenance

Maintenance Manager	812-342-1141 x 167
Maintenance Supervisor	812-342-1141 x 170

NOTES