

The logo for West Central Sanitation is a blue rectangle with the words "WEST CENTRAL" on the top line and "SANITATION" on the bottom line, both in a bold, yellow, sans-serif font. The rectangle is framed by two thin white horizontal lines above and below it.

WEST CENTRAL SANITATION

West Central Sanitation

Employee Handbook

A large blue triangle graphic that starts at the bottom left corner and extends diagonally upwards to the right, ending at the top right corner of the page.

Good Neighbors You've Come To Trust

Table of Contents

- 1. Introduction 4**
 - a. Welcome
 - b. Nature and Purpose of the Employee Handbook

- 2. Employment Policies 5**
 - a. Equal Employment Opportunity
 - b. Reasonable Accommodation
 - c. Immigration Law Compliance
 - d. Workplace Harassment Policy
 - e. Substance Abuse

- 3. Recruitment/Hiring 9**
 - a. Employment At Will
 - b. Open Door Policy
 - c. Orientation and Training
 - d. Transfers and Promotion

- 4. Employment Practices 10**
 - a. Compensation
 - b. Pay Periods and Payroll Distribution
 - c. Payroll Deductions
 - d. Hours of Work
 - e. Inclement Weather
 - f. Employee Time Guidelines
 - g. Punctuality and Attendance
 - h. Employee Conduct and Work Rules
 - i. Job Performance
 - j. Conflicts of Interest

- 5. Employee Classification 15**
 - a. Exempt
 - b. Non-exempt
 - c. Full-time
 - d. Part-time
 - e. Temporary

- 6. Benefits and Leave Time 17**
 - a. Paid Time Off
 - b. Holiday Pay
 - c. Bereavement Leave
 - d. Jury Duty Leave
 - e. Witness Leave
 - f. Voting Leave
 - g. Military Service Leave
 - h. Military Leave
 - i. Family Military Leave
 - j. Continuation of Medical Coverage Insurance (COBRA)
 - k. Family Medical Leave
 - l. Working Parent Rights
 - i. MN Pregnancy and Parental Leave Law
 - ii. Pregnancy Accommodations
 - iii. School Conference and Activities Leave

- iv. Nursing Mothers
- m. Bone Marrow Donor Leave
- 7. Standard of Conduct23
 - a. Computer and E-mail Usage
 - b. Internet Usage
 - c. Social Media Policy
 - d. Use of Phone and Mail Systems
 - e. Smoke Free Workplace
 - f. Workplace Violence Prevention
 - g. Policy Prohibiting Weapons in the Workplace
 - h. General Information
 - i. Workers' Compensation Insurance
- 8. Termination of Employment 33

INTRODUCTION

WELCOME

Welcome to West Central Sanitation (WCS). We wish you every success here. We believe each employee contributes directly to WCS growth and success and we hope you take pride in being a member of our team.

This Employee Handbook was developed to describe and clarify some of the expectations of our employees, and to outline the policies, practices, procedures and benefits available to eligible employees. You should familiarize yourself with the contents of the Employee Handbook for it will answer many questions about your employment with WCS.

We hope your experience here will be challenging, enjoyable and rewarding.

NATURE AND PURPOSE OF THE EMPLOYEE HANDBOOK

The Employee Handbook is designed to provide you with a description of WCS policies as they pertain to you as an employee, and to help answer many of the questions that may arise in connection with your employment. It presents a standardized approach for the administration of policies to reduce ambiguities and difficulties that might arise from unwritten or inconsistent policies or lack of proper communications.

This Employee Handbook and the policies contained herein do not in any way constitute, and should not be construed as, a binding contract of employment or a promise of continued employment between WCS and the employee.

This Employee Handbook does not alter the at-will employment relationship between WCS and its employees. Please see the at-will employment relationship section for further details.

The Employee Handbook is intended solely to describe the present policies and working conditions at WCS. The Employee Handbook does not purport to include every conceivable situation; it is merely meant as a guideline and, unless laws prescribe otherwise, common sense shall prevail. Of course, federal, state and/or local laws will take precedent over Company policies where applicable. With regard to your health benefits, for example, the descriptions in this Employee Handbook should not be relied upon; rather you should consult the actual plan documents for detailed plan information.

This Employee Handbook supersedes and replaces any and all written personnel policies, handbooks, guides and Employee Handbooks previously distributed to, made available to, or applied to employees of WCS, and is the only Employee Handbook with any force or effect. All prior personnel policies and handbooks are hereby rescinded and revoked.

WCS reserves the right to apply any or all of these policies in whole or in part at its discretion as it deems appropriate depending on individual circumstances. WCS can deviate from this Employee Handbook as it deems appropriate. The application or non-application of any or all of these policies does not alter or change WCS's right to apply these policies in whole or in part as it deems appropriate.

WCS reserves the right to change, withdraw, apply or amend any of our policies or benefits, including those covered in this Employee Handbook, at any time. WCS may notify you of such changes via email, posting on WCS's Intranet, Portal or website, or via a printed memo, notice, amendment to or reprinting of this Employee Handbook but may, in its discretion, make such changes at any time, with or without notice.

As used in this Employee Handbook:

“Manager” means an individual with the authority to assign, direct, and review the work of subordinates.

“Immediate family” means the employee’s spouse, siblings, parents, children, grandchildren, father- and mother- in-law, and employee’s grandparents. Step- and adopted children are treated as children.

“Plan Year” means the period of time, January 1 through December 31, as it relates to their normal scheduled hours.

“Week” is equal to 40 hours as related to “full-time” employees.

“Company” or **“the Company”** refers to WCS.

EMPLOYMENT POLICIES

EQUAL EMPLOYMENT OPPORTUNITY

WCS is fully committed to equal employment opportunities (EEO). All employment decisions will be made without regard to race, color, age, religion, sex, pregnancy, marital status, familial status, disability, national origin, sexual orientation, veteran status, status with regard to public assistance or activity in a local human rights commission. In addition, we comply with all applicable state and local laws governing non-discrimination in employment in every location in which we maintain facilities.

Decisions concerning employment are based strictly on an individual's qualifications and ability to perform the job under consideration, the comparative qualifications and abilities of the other applicants or employees, and the individual's past performance within the organization. Employment decisions include, but are not limited to: recruitment, hiring, promotions, salary or other compensation, benefits, transfers, corrective actions, layoffs, termination and training.

If you believe that an employment decision has been made that does not conform to management's commitment to equal opportunity, the matter should be brought promptly to the attention of Human Resources. Your complaint will be thoroughly investigated. There will be no retaliation against any employee who files a complaint in good faith, even if the result of the investigation produces insufficient evidence to support the complaint. Please see the WCS Workplace Harassment Policy for additional information.

REASONABLE ACCOMMODATION

WCS is committed to complying with the Americans with Disabilities Act (ADA). In accordance with the federal and state law, WCS provides reasonable accommodation to known physical or mental limitations of an otherwise qualified employee with a disability unless the accommodation would impose an undue hardship on the company. Reasonable accommodation may be, depending on all the circumstances, modification or adjustment to a job, the work environment, or the way things usually are done that enable an employee with a disability to perform the essential functions of a job, and to enjoy equal benefits and privileges of employment.

If an employee requests a reasonable accommodation, he/she should do so in writing. WCS may request a physician's statement documenting the need for the requested accommodation. All requests for reasonable accommodation should be submitted to Human Resources.

IMMIGRATION LAW COMPLIANCE

WCS complies with the Immigration Reform and Control Act of 1986 by employing only United States citizens and non-citizens who are authorized to work in the United States. All employees are asked on their first day of employment to provide original documents verifying the right to work in the United States and to sign a verification form required by federal law (Form I-9). If an individual cannot verify his/her right to work within three days of hire, WCS will terminate employment.

WORKPLACE HARASSMENT POLICY

WCS is committed to providing a work environment that maintains employee equality, respect and dignity. In keeping with this commitment, WCS maintains a strict policy prohibiting any form of unlawful employee harassment based on race, color, age, religion, sex, pregnancy, marital status, familial status, disability, national origin, sexual orientation, veteran status, status with regard to public assistance or activity in a local human rights commission, or other applicable status protected by federal, state or local laws. Harassment, whether verbal, physical or environmental, and whether in the workplace or in outside work-sponsored settings, is unacceptable and will not be tolerated.

Sexual harassment is illegal under federal, state and local laws, and applies equally to men and women. It is defined in the Equal Employment Opportunity Commission (EEOC) Guidelines as any unwelcome sexual advance, request for sexual favor, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. These behaviors may include, but are not limited to: subtle or overt pressure for sexual favors; derogatory or vulgar statements regarding one's sexuality or gender; unnecessary touching, patting, pinching or attention; innuendoes, suggestions or jokes; turning work discussions into sexual topics; or displaying sexually suggestive visual materials.

Any employee who believes he or she has been subjected to any form of harassment, or has been witness to it, by anyone, including supervisors, coworkers or customers, is urged to immediately bring their complaint to either their supervisor and/or Human Resources. If the complaint is regarding a manager or supervisor, contact Human Resources. The complaint will be immediately and thoroughly investigated in a professional manner. There will be no retaliation against any employee who files a complaint in good faith or who assists in providing information relevant to a claim of harassment, even if the investigation produces insufficient evidence to support the complaint. If the facts and results of the investigation substantiate the complaint, then the appropriate corrective action will be taken, up to and including termination.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination of employment, and may include such other forms of corrective action as we deem appropriate under the circumstances and in accordance with applicable law.

Confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances, to protect the privacy of persons involved. Investigation may include interviews with the parties involved and, where necessary, individuals who may have observed the alleged conduct or who may have relevant knowledge.

This policy applies to all employees (managers, supervisors and staff), whether related to conduct engaged in by fellow employees, supervisors, or someone not directly connected to WCS (e.g., outside vendors, consultants, customers, etc.). WCS will make every reasonable effort to ensure that its entire population is familiar with this policy and is aware that every complaint received will be investigated and resolved appropriately. WCS encourages reporting of all perceived incidents of sexual harassment, regardless of who the offender may be. Every employee is encouraged to raise any questions or concerns with Human Resources.

WCS recognizes that false accusations can have serious effects on innocent persons. If an investigation results in a finding that a person who has accused another of a violation of this policy has maliciously or recklessly made false accusations, the accuser will be subject to appropriate corrective action, up to and including termination.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with the appropriate government agency. Using our complaint process does not prohibit you from filing a complaint with these agencies.

SUBSTANCE ABUSE

WCS's substance abuse policy complies with federal and state laws and regulations. WCS believes every employee has the right to work in an environment free of hazards and our customers deserve reliable employees who will not introduce hazards to their workplace. WCS recognizes alcohol and drug abuse as potential health, safety and security problems. WCS expects all employees to assist in maintaining a work environment free from the effects of alcohol, drugs or other intoxicating substances. Compliance with this substance abuse policy is a condition of employment.

WCS prohibits employees from the possession, use, impairment by, sale, dispensation, distribution, purchase, or unlawful manufacture of un-prescribed drugs and intoxicants on WCS premises and from working under the influence of alcohol, illegal drugs or intoxicants during working hours.

Employees who violate any of the above policies will be subject to immediate discharge.

Employed commercial drivers who violate the drug and alcohol policy will be subject to action according to Federal Motor Carrier Safety Administration guidelines.

In addition, some prescription and non-prescription drugs can affect the ability to drive and/or operate heavy equipment. These drugs may not be taken while on duty or just prior to coming on duty. Most of these drugs will carry a warning label on the bottle.

If you have any questions on a particular medication, check with your doctor or pharmacy. Drivers may not work during the life of a prescription which may affect the ability of the employee while operating any type of heavy equipment.

The company reserves the right to prevent an employee from starting work when it is felt the employee cannot safely perform their duties. The employee will not be paid for such day where it is determined they are unable to perform their duties.

While it is not the company's intention to interfere in anyone's "off-duty activities", should the use of alcohol or involvement with controlled substances be such as to have an impact or potential impact on the conduct of the business, it may be cause for disciplinary action, including termination of employment.

Any violator of this substance abuse policy will be subject to appropriate corrective action, up to and including termination of employment.

When work performance is impaired, admission to or use of a treatment or other program does not preclude appropriate action by WCS.

Required Testing

The company also reserves the right to require that employees take pre-employment, random, periodic and reasonable cause drug screen tests in accordance with Federal requirements and company policy. Failure to take such tests will result in disciplinary action, determined by Human Resources, up to and including termination.

Pre-Employment Testing: If a job applicant has received a conditional job offer, WCS may require or ask that applicant to undergo testing, as long as all applicants who receive conditional job offers for the same position are required or asked to undergo testing.

Random Testing: WCS may require employees to submit to random testing only if they are employed in safety-sensitive positions, defined in Minnesota statutes as jobs in which an impairment caused by drug or alcohol usage would threaten the safety or health of any person.

Reasonable Suspicion: Employees are subject to testing based upon (but not limited to) observations of an individual being under the influence of alcohol, illegal drugs or intoxicants while at work. Human Resources or a Department Manager shall be consulted before sending an employee for testing. All levels of supervision making this decision must utilize the "Reasonable Suspicion Documentation" to document specific observations and behaviors that create a reasonable suspicion that the person is under the influence of illegal drugs and/or alcohol. If the results of the "Reasonable Suspicion Documentation" indicate further action is justified, the manager/supervisor should confront the employee with the documentation and with another member of management.

Under no circumstances will the employee be allowed to drive himself or herself to the testing facility. A member of supervision/management must escort the employee; the supervisor/manager will make arrangements for the employee to be transported home.

Post-accident: Employees are subject to testing when they cause or contribute to accidents that seriously damage a WCS vehicle, machinery, equipment, or property and/or result in an injury to themselves or another employee requiring off-site medical attention. A probable belief circumstance will be presumed to arise in any instance involving a work-related accident or injury in which an employee who was operating a motorized vehicle (including, but not limited to, forklift, WCS vehicle, overhead cranes, aerial/man-lifts, etc.) is found to be responsible for causing the accident. In any of these instances, the investigation and subsequent testing must take place as soon as reasonably possible.

Under no circumstances will the employee be allowed to drive himself or herself to the testing facility.

Failure to submit to the test is grounds for dismissal.

RECRUITMENT AND HIRING

WCS's primary goal when recruiting new employees is to fill vacancies with individuals who have the best available skills, abilities or experience needed to perform the work. Decisions regarding the recruitment, selection and placement of employees are made on the basis of job-related criteria.

When positions become available, qualified staff members are encouraged and are welcome to apply for the position. As openings occur, notices relating general information about the position are posted. The manager of the department with the opening will arrange interviews with employees who apply.

EMPLOYMENT AT WILL

Nothing contained in this Employee Handbook should be construed as creating a contract guaranteeing employment for any specific duration. Unless you have entered into an Employment Agreement that supersedes this document, either you or WCS may terminate the employment relationship at any time, with or without cause or prior notice. Two-week's notice prior to resignation, however, is customary as a matter of general business practice.

Note that no manager, employee or representative of WCS, other than the President, is authorized to enter into any oral or written agreements inconsistent with the foregoing and no such agreement shall be enforceable unless it is in writing and signed by the President and the employee.

OPEN DOOR POLICY

WCS welcomes open communication between employees and supervisors or managers. WCS provides an Open Door Policy to encourage an exchange of information. Employees are invited to share their concerns and provide input to their supervisor or manager at any time.

It is your supervisor's or manager's responsibility to address any employee concerns and provide appropriate follow-up with the employee. However, if your immediate supervising manager cannot adequately address your questions or solve your problem, you may contact any other appropriate member of management at WCS.

ORIENTATION AND TRAINING

All employees will serve a ninety (90) day training and orientation period. During this time the employee will receive both classroom and on-the-job training. They will become familiar with the equipment they will be operating, the various jobs they may be assigned, safety and operation policies and other people with whom they may be working.

This period will allow both the company and the new employee an opportunity to determine ability and interest to perform the assigned work.

Employees will be evaluated at the end of their 90-day training and orientation period.

Please keep in mind that both during and after the orientation period, your employment remains at-will.

TRANSFERS AND PROMOTIONS

In an effort to match you with the job for which you are most suited, and because of the dynamic and changeable nature of our industry, you may be transferred to another department from your current job. This may be either at your request or as a result of a decision by WCS.

Reasons for transfer may include, but are not necessarily limited to: fluctuations in department workloads or production flow, more efficient utilization of personnel, increased career opportunities, personality conflicts, reasons of health, or other personal situations.

The management of WCS does reserve the right, however, to transfer or promote an employee without posting the availability of that position. Temporary transfers may be made at the discretion of WCS management.

Your eligibility for transfer or promotion is determined by the requirements of the new job. Another condition of transfer or promotion is satisfactory performance of your current job for a period of six months prior to your request for transfer. However, a transfer may take place within the first six months of employment if the management of WCS believes that it is in the best interest of WCS to make an exception to this guideline.

EMPLOYMENT PRACTICES

COMPENSATION

Our goal is to provide attractive, competitive pay, along with benefits and other forms of compensation. Compensation is based in part on community pay practices and productivity. We recognize the experience and training employees bring with them to the Company or gain while with the Company. Our continued ability to meet this standard is dependent upon the effort of each and every one of us to contribute to the Company's continued growth and performance.

Your rate is established and reviewed on an annual basis. Any questions regarding your compensation should be discussed with your supervisor or site manager.

PAY PERIODS AND PAYROLL DISTRIBUTION

Pay periods for all employees are bi-weekly, covering work performed during the previous 2 work weeks, Sunday through Saturday. WCS uses electronic direct deposit for payroll. Deposits are credited Friday mornings in employee accounts. New employees not activated in direct deposit will be issued manual checks. If the regularly scheduled payroll date falls on a holiday, Human Resources will attempt to deliver paychecks on the day prior to the holiday.

PAYROLL DEDUCTIONS

All mandatory deductions and withholdings such as federal income tax, social security, state, city and/or local income tax, as well as all authorized voluntary payroll deductions, such as for health insurance, and other deductions, as arranged with Human Resources, will be withheld automatically from your paycheck.

HOURS OF WORK

The work week is generally from Monday through Friday; with normal operating hours from 5:00 am to 6:00 pm. Employees working an 8-hour daily schedule are entitled to, and encouraged to take an unpaid 30–60-minute lunch break.

INCLEMENT WEATHER

WCS is open for business unless there is a declared State of Emergency. Use common sense and good judgment so you arrive safely to and from work during inclement weather. If you are asked to leave early due to weather conditions, unused available PTO can be used if the employee wishes.

EMPLOYEE TIME GUIDELINES

Each employee is responsible for the management of his or her own elective time off. Supervisors provide approval based upon established work schedules and available work force. Every effort will be made to comply with time off requests from employees that have earned time off. See rules governing Absenteeism/Tardiness. Overages to allowable earned time off are ineligible for compensation.

WCS provides employees several options for income continuation. Work related injury compensation is covered by our Return-to-Work Policy, governed by Workman's Compensation. Non-work-related injury compensation continuation is provided through our Short-Term Disability Insurance. Employees seeking elective time off from scheduled work must utilize PTO. PTO is also used for the purpose of salary continuation when the employee is physically unable to work or must support the medical care of a direct family member.

The requirements for extended absence from work to support family and medical leave are addressed in the Family and Medical Leave Section of the Handbook.

No-pay days or hours will only be considered for approval when the employee has no PTO available.

Employees are to be on time and available for work for each scheduled workday, regardless of the cumulative hours of work put in during the pay period. A forty-hour workweek is used only for the determination of when overtime applies (excluding salaried positions). Schedule relief may be requested from your supervisor.

PUNCTUALITY AND ATTENDANCE

In a service industry such as ours, absenteeism and tardiness cause severe problems with our customers, operations, and, in turn, other employees who must service the route for the employee who is late or absent.

Customers rightfully expect a level of service which can only be delivered by a regular employee who has become totally familiar with the service needs, space and clearance problems, and traffic hazards of a particular route. Operations and dispatch are literally buried with unnecessary phone calls and complaints when regular service is disrupted by absenteeism. Swing employees can provide neither the level of service nor the efficiency of the regular employee. They are placed in unfamiliar equipment, on an unfamiliar route unaware of most of the problems and hazards known only to the regular employee. Service and safety suffer under these circumstances.

All employees have the obligation to personally notify their supervisor if they are unable to report to work. Notification must be made at least one (1) hour prior to the scheduled starting time so that management has the opportunity to reassign work to other employees. Failure to provide one (1) hour notice will be treated as if no notice was provided.

When the employee is unable to report to work, the company wants to hear from the employee himself or herself whenever possible -not a wife, husband, friend or family member. Contact must be made with your immediate supervisor or Site Manager.

ANY EMPLOYEE WHO FAILS TO REPORT FOR WORK AND FAILS TO NOTIFY HIS OR HER SUPERVISOR OR SITE MANAGER FOR TWO (2) CONSECUTIVE SCHEDULED WORKING DAYS WILL BE CONSIDERED TO HAVE VOLUNTARILY TERMINATED EMPLOYMENT WITH THE COMPANY.

Tardiness will be considered anything later than the assigned starting time.

Regular delays in reporting to work will result in disciplinary action and/or loss of pay for the time not worked.

EMPLOYEE CONDUCT AND WORK RULES

To assure orderly operations and provide the best possible work environment, WCS expects employees to follow rules of conduct that will protect the interests and safety of all employees and WCS. Above all, employees are expected to treat coworkers and customers courteously and are responsible for maintaining positive, productive relationships. Any actions or behavior which may be offensive to coworkers or may jeopardize customer relations are strictly forbidden.

While it is not possible to list all of the forms of behavior that are considered unacceptable in the work place, the following is a nonexclusive list of examples of infractions of rules of conduct that may result in corrective action, up to and including termination:

- Carelessness which results in damage or injury to WCS property or employees.
- Coercion of, threats against, intimidation of, interference with or abuse of other employees.
- Discourteous treatment of coworkers, management, customers, suppliers or an individual where contact is in the capacity of an employee of WCS.
- Dishonesty or falsification of records.
- Failure to follow a superior's instructions, defiance, general insubordination or other disrespectful conduct.
- Failure to adhere to policies and procedures as outlined in this Employee Handbook.
- Failure to report for work, being tardy, sleeping, loitering, loafing, excessive visiting, abuse of rest periods, wasting time or failing to expend the necessary effort in the performance of the work assignment.
- Harassment of or discrimination against another employee, customer or any other person where contact is a result of the employment relationship with WCS.
- Making or publishing false or malicious statements about employees or WCS.
- Possession or use of weapons on WCS property.
- Possession of dangerous or unauthorized materials, such as explosives and firearms, in the workplace
- Theft or inappropriate removal or possession of property.

- Transporting, possessing, transferring, using or being under the influence of intoxicating beverages or controlled substances at any time, including while en route to work.
- Unauthorized disclosure of confidential information.
- Unauthorized release or disclosure of business or customer information.
- Violation of safety and health rules
- Excessive absenteeism or any absence without notice

JOB PERFORMANCE

Each and every employee contributes to the success or failure of WCS. If one employee allows his or her performance to slip then all of us suffer. We expect everyone to perform to the highest level possible. Poor job performance can lead to corrective action up to and including termination of employment.

Because our employee's performance is vital to our success, we may conduct periodic reviews on individual employee performance. We hope that through these reviews, our employees will learn what we expect of them and we will learn what they expect of us. We require all employees to participate in the review process when it occurs. Failure to participate could lead to corrective action up to and including termination of employment.

Progressive Discipline

Any employee conduct that violates WCS rules or that in the opinion of WCS can interfere or adversely affect our business is sufficient grounds for corrective action. Corrective action can range from coaching to immediate discharge. Our general policy is to take corrective steps in the following order:

- **Coaching**
- **Verbal warnings**
- **Written warnings**
- **Termination**

However, we reserve the right to alter the order described above, to skip corrective steps, to eliminate corrective steps or to create new or additional corrective steps depending on the facts and circumstances of each individual case. In choosing the appropriate corrective action we may consider any number of factors, including; the seriousness of your conduct, your history of misconduct, your employment record, your length of employment, the strength of evidence against you, your ability to correct the conduct, your attitude about the conduct, actions we've taken for similar conduct by other employees, how your conducts affects this company, its customers and your coworkers, other circumstances related to the nature of the misconduct, and to your employment with this company and the effect of the misconduct on the business of WCS.

You should remember that your employment is at the mutual consent of you and WCS. This policy does not change this fact. This means that you or WCS can terminate the employment relationship at will at any time, with or without cause and with or without advanced notice. As a result, WCS reserves its right to terminate your employment at any time, for any lawful reason including reasons not listed above. You will also have the right to end your employment at any time.

CONFLICTS OF INTEREST

We set a high standard of conduct at WCS and expect all of our employees to always fulfill each function to the highest possible ethical standards. We "do the right thing", or we do not do it at all.

Generally, each of us is expected to conduct ourselves with a common-sense attitude toward our positions and our work and towards others with whom we come in contact. If you treat others in a cooperative manner with a courteous and respectful attitude, just as you expect to be treated, you will have no problem.

As an employee of WCS, you are representing us to the outside world and we request you conduct yourself with the highest degree of loyalty and personal integrity. Business dealings that appear to create a conflict between the interests of WCS and an employee are unacceptable. WCS recognizes the right of employees to engage in activities outside of their employment which are a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that WCS may assess and prevent potential conflicts of interest from arising.

Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth the ones which most frequently present problems. If an employee has any question whether an action or proposed course of conduct would create conflict of interest, he or she immediately should contact Human Resources to obtain advice on the issue. The purpose of this policy is to protect employees from any conflict of interest that might arise.

A violation of this policy will result in appropriate corrective action, up to and including termination.

Outside Employment

From time to time, WCS employees may be required to work beyond their normally scheduled hours. Employees must perform this work when requested. In cases of conflict with an outside activity, the employee's obligations to WCS must be given priority. Employees are hired and continue in WCS's employ with the understanding that WCS is their primary employer and that other employment, which is in conflict with the business interests of WCS, is strictly prohibited.

In general, outside work activities are not allowed when they:

- Prevent the employee from fully performing work for which he or she is employed at WCS, including overtime assignments,
- Present a conflict of interest or have an adverse impact on WCS.

Acceptance of Gifts

No employee may solicit or accept gifts of significant value (i.e., in excess of \$50.00), lavish entertainment or other benefits from potential and actual customers, suppliers or competitors. Special care must be taken to avoid even the impression of a conflict of interest.

An employee may entertain potential or actual customers if such entertainment is consistent with accepted business practices, does not violate any law or generally accepted ethical standards and the public disclosure of facts will not embarrass the Company. Any questions regarding this policy should be addressed to the Human Resources Department.

Hiring of Relatives

Usually, WCS will not refuse to hire someone simply because he or she is related to one of our current employees. There are times however, when employing relatives is inappropriate and has the potential to affect the morale of other employees and to create conflicts of interest for the relatives involved. Therefore, we will not hire relatives of our current employees where one relative will have to supervise the other. If two employees become related while working for WCS, and if one of them is in a position of

supervision over the other, only one of the employees will be allowed to keep his or her position. The other will have to transfer to another position or leave WCS.

Under this policy, the term “relatives” encompasses husbands, wives, live-in partners, domestic partners, parents, children, siblings, in-laws, cousins, aunts and uncles. This policy covers biological relationships, marriage relationships and step relationships.

Confidential Nature of Work

The protection of confidential business information and trade secrets is vital to the interests and the success of WCS. All WCS records and information relating to WCS or its customers are confidential and employees must, therefore, treat all matters accordingly.

No WCS or WCS -related information, including (without limitation) documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of WCS) may be removed from WCS’s premises or disclosed without permission.

Additionally, the contents of WCS’s records or information otherwise obtained in regard to business may not be disclosed to anyone, purposefully or inadvertently through casual conversation, to any unauthorized person inside or outside WCS. Employees who are unsure about the confidential nature of specific information must ask their manager or Human Resources for clarification.

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

Individuals no longer employed by WCS may be subject to legal action for disclosure of any proprietary information prior to that information becoming public information through appropriate channels.

EMPLOYEE CLASSIFICATIONS

Employees are classified as either exempt or non-exempt for pay administration purposes as determined by the Fair Labor Standards Act (FLSA). *The definitions of the worker classification categories can be summarized as follows:*

EXEMPT

Management, supervisory, professional, sales or administrative employees, whose positions meet FLSA standards, are exempt from overtime pay requirements.

NON-EXEMPT

Employees whose positions do not meet the FLSA exemption standards are paid overtime. Employees classified as non-exempt generally work in non-supervisory, non-professional or non-administrative capacities.

In addition, each employee's status is defined as one of the following:

FULL-TIME

Employees who work a minimum of 40 hours per week are considered to be full-time. Such full-time employees are eligible for benefits after applicable requirements for length of service have been met.

WCS supplements its regular work force with temporary or part-time employees to help compensate for workload, employee absences, or other situations. Management will determine which positions are regular part-time and which are considered temporary or seasonal.

PART-TIME

Employees who work less than 40 hours per week are considered to be part-time.

Employees who work 40 hours or less per week, or who work on a temporary project basis, will receive all legally mandated benefits (such as Worker's Compensation and Social Security benefits), but are ineligible for all other benefit programs described in this Employee Handbook.

Once qualified and enrolled, employees remain eligible for profit sharing if they work a total of one thousand hours or more per calendar year.

TEMPORARY

Temporary employees are those engaged to work either part-time or full-time on the WCS payroll, but have been hired with the understanding that their employment will be terminated no later than upon their completion (at the discretion of WCS) of a specific assignment. This category includes interns and co-op students. Such employees may be either "exempt" or "non-exempt" but are not eligible for WCS benefits except as mandated by law.

If your status changes from temporary or part-time to full-time, you are considered hired on the date you become a full-time employee for purposes of calculating eligibility for benefits that require full-time employment for eligibility purposes.

BENEFITS AND LEAVE TIME

The following benefits are allowable to employees.

Eligible team members at WCS are provided a wide range of benefits. Benefits eligibility is dependent upon a variety of factors, including team member classification. Human Resources can identify the program(s) for which you are eligible.

PAID TIME OFF

Employees accrue Paid Time off (PTO) per the following schedule:

Service Period	PTO Hours (3) Accrued per year	Incentive PTO (1)(3) Rate/ (possible yrly)	Carry over Allowance (2)
Start – 1 year	40	6.5 hr/Qtrl (26 hr)	50
1 + year – 5 years	80	7.0 hr/Qtrl (28 hr)	160
5 + years – 10 years	80	7.5 hr/Qtrl (30 hr)	160
10 + years – 15 years	120	8.0 hr/Qtrl (32 hr)	160
15 + years – 20 years	120	8.5 hr/Qtrl (34 hr)	160
20 + years – 25 years	120	9.0 hr/Qtrl (36 hr)	180
25 years +	120	9.5 hr/Qtrl (38 hr)	180

- (1) Perfect attendance applies, see below.
- (2) PTO in excess of the allowance is lost each year after December 31.
- (3) PTO is not earned during a leave of absence, a period of disability or when days are taken off without pay.

PTO is used for all scheduled and unscheduled absences from work; these include but are not limited to:

- Ordinary personal recreation time
- Employee is sick and unable to work due to illness or injury, or to care for a family member
- Employee has a medical or dental procedure or checkup that cannot be scheduled during off hours or flex time.

PTO days shall be used in whole day (8 hr.) increments or by full hour increments for employees who leave work ill or for an appointment.

Each employee with perfect attendance in a calendar quarter will be awarded Incentive PTO per the schedule listed above. The yearly maximum incentive is based upon seniority. Tardy or unapproved absences exclude the employee from the quarterly incentive program.

Perfect attendance for the purpose of this policy is defined as; reporting to work on time for all scheduled tasks and assignments. The exceptions being pre-approved PTO (pre-scheduled by 5:00 p.m. the day before) limit of two (2) short time notifications per year, or approved early departures and two (2) late starts (tardy) per year. Short time notifications are defined as: calling in to the employee's supervisor (*) after 5 pm the day prior. An employee with a pre-approved start time variation or flex time coordinated to result in the equivalent hours of regularly scheduled work in the same week counts as perfect attendance. Use of PTO to adjust hours per week after the fact, is considered unscheduled PTO.

*Note: If you are unable to reach your supervisor by phone, a message should be left to record the call, but continue calling until you physically speak with a supervisor.

Probation period new employees: Insurance benefits start the first of the month following thirty (30) days of service. PTO begins to accrue at hire but is available for use after the first full quarter following employee start.

Termination: Earned, unused PTO will be cashed out upon separation/termination and applied to the employees final pay check. Incentive PTO is not pro-rated. You must work a full calendar quarter to be eligible.

HOLIDAYS

It is West Central Sanitation’s policy to recognize the following holidays:

New Year’s Day	Memorial Day	Independence Day
Labor day	Thanksgiving Day	Christmas Day

We will compensate the employee for eight (8) hours regular pay (holiday pay) for the week in which the holiday falls.

To be eligible to receive holiday pay, the employee must work the day before and the day after the holiday, if the holiday falls during regularly scheduled working hours (Monday-Friday). To be eligible to receive holiday pay for holidays that fall on a Saturday or Sunday, the employee must work the day before and the day after the weekend.

Exception: approved PTO may be taken adjacent to a holiday or holiday weekend with management pre-approval.

Requirements for PTO requested adjacent to a holiday:
 First evaluated based upon staffing needs to support operations. Management reserves the right to restrict approvals.

- 1) Requested and approved at least two weeks prior to the holiday to qualify for holiday pay.
- 2) Granted on a first requested, first approved basis.
- 3) Approvals will be rotated to maintain fairness.
- 4) Requests received at the same time will be resolved by seniority.

Approved PTO within the above guidelines qualifies for holiday pay. Unapproved PTO will exempt the employee from holiday pay for that period and will be considered absenteeism under Business Practices.

An employee scheduled by his supervisor to work on a holiday will be paid time and one half, plus holiday pay (straight time).

Supervisory employee PTO approvals will be based upon availability of supervisory staff.

BEREAVEMENT LEAVE

When a death occurs in an employee's immediate family, the employee, upon request, will be excused up to three (3) scheduled working days following the date of the death, provided such absence is necessary and the funeral is attended. Immediate family includes spouse, child, stepchild, grandchild, step-grandchild, parent, grandparent, stepparent, brother, stepbrother, sister, stepsister, mother-in-law, father-in-law. Payment for the days of work that are missed will be made at the employee's straight time hourly rate of pay.

JURY DUTY LEAVE

WCS encourages employees to fulfill their civic duties. To that end, employees will be allowed leave to serve on a jury, if summoned. We request that you bring in a copy of your summons notice as soon as you receive it, so that we may keep it on file. If you are called during a particularly busy period, we may ask you to request a postponement. WCS will provide additional documentation in this regard, if necessary, to obtain such postponement.

Jury Duty can last from several days to several months or more. While serving on Jury Duty, you are expected to call in to your supervisor periodically to keep him/her apprised of your status. WCS will compensate full-time employees for the difference between Jury Duty compensation and your current daily pay for the first five days you serve as a juror (or in accordance with applicable law, if different). If additional time is required, it will be granted, but without pay.

WITNESS LEAVE

An Employee called to appear as a witness will be permitted time off to appear, but without pay. Employees will be permitted to use available PTO when appearing as witnesses.

VOTING LEAVE

WCS encourages all employees to vote. Most polling facilities for elections for public office are scheduled to accommodate working voters. WCS, therefore, requests that employees schedule their voting for before or after their work shift. An employee who expects a conflict, however, should notify his/her supervisor in advance so that schedules can be adjusted if necessary and appropriate.

MILITARY SERVICE LEAVE

Employees serving in the reserve or National Guard may take unpaid military leave, as needed, to enable them to fulfill their obligations as reservists or Guard members. Employees may also use PTO for this purpose, if available.

MILITARY LEAVE

WCS will grant an unpaid Military Leave to employees who are absent from work because they are serving in the U.S. Uniformed Services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). You are required to give your supervisor advance notice of upcoming military service, unless military necessity prevents advance notice or it is otherwise impossible or unreasonable.

Continuation of health insurance benefits is available as required by USERRA based on the length of the leave and subject to the terms, conditions and limitations of the applicable plans for which you are otherwise eligible.

When you return from Military Leave, you will be reinstated to your previous position or a position of like seniority, status and pay you would have attained if you had remained continuously employed. For the purpose of determining benefits that are based on length of service, you will be treated as if you had been continuously employed.

If you have questions about Military Leave, contact Human Resources for more information.

FAMILY MILITARY LEAVE

WCS will grant an unpaid leave of absence of up to 10 working days to qualified employees under the following conditions:

- The employee's immediate family member is a member of the armed forces and has been injured or killed while engaged in active service, or
- The employee's immediate family member has been ordered into active service in support of a war or other national emergency.

Immediate family member includes parent, child, grandparents, spouse or siblings.

The employee should give WCS as much notice as practicable to take a leave under this policy.

CONTINUATION OF MEDICAL COVERAGE INSURANCE (COBRA)

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under WCS's health plan when a "qualifying event" would normally result in the loss of eligibility.

If an employee participates in WCS's benefit plans and then loses coverage due to a qualifying life event as determined by Minnesota Continuation Law. He/she may continue his/her medical insurance for up to 18, 29, 36 months, or indefinitely, depending on the qualifying event and in accordance with Minnesota Continuation Law. The employee must elect continuation within 60 days of the qualifying event. It is the employee's responsibility to advise Human Resources if dependent coverage is being lost due to any qualifying event or reason.

It is the employee's responsibility to send in the total cost stated in the COBRA forms by the beginning of each month for that month, or WCS will terminate coverage if no payment has been received.

Per COBRA guidelines, the employee or his/her dependents will be responsible for the full cost of the plan.

FAMILY MEDICAL LEAVE

General Provisions

Employees of WCS, after the completion of one (1) year of employment, may be granted up to twelve (12) weeks of unpaid leave for:

The birth of a child and to care for such child or for a child newly placed with the employee through adoption or foster care.

The care of the employee's seriously ill current spouse, child, or parent (or up to 10 business days of Family Military Leave to care for a service member with a serious injury or illness).

A serious health condition which makes the employee unable to perform his/her job function.

The employee must have worked for WCS for 12 months or 52 weeks. The employee must have worked at least 1,250 hours during the 12-month period immediately before the date when the leave is requested to commence. The principles established under the Fair Labor Standards Act (FLSA) determine the number of hours worked by an employee. The FLSA does not include time spent on paid or unpaid leave as hours worked. Consequently, these hours of leave should not be counted in determining the 1,250 hours eligibility test for an employee under FMLA.

Notice of Request for Leave

In order to have a leave of absence, an employee must notify their manager and Human Resources thirty (30) days prior to the absence.

If circumstances do not permit a 30-day notice, the employee must notify management of the absence as soon as practicable. An employee's entitlement to leave for the birth or placement of a child must take place within twelve (12) months after the birth or placement and be completed by the end of the 12-month period.

Certification

When leave is requested either to care for an employee's seriously ill family member or due to a personal serious health condition that makes the employee unable to perform the functions of his/her job, a proper medical certification from a health care provider must be furnished to Human Resources for the leave to be approved. WCS may request a second and possibly third medical opinion at WCS's expense. The employee may also be required to provide re-certifications from the health care provider. Certification forms are available from Human Resources.

Continuation of Health Care Benefits During Leave

During Family Medical Leave, WCS does not pay for insurance premiums. Employees may continue their health care benefits by paying the full health insurance premium. Failure to pay your health insurance premium will result in loss of coverage.

Subject to the terms, conditions, and limitations of the applicable plans, WCS will provide health insurance benefits until the end of the month in which a medical leave begins. At that time, you will become responsible for those benefits in order for coverage to continue. When you return from medical leave, WCS will resume providing those benefits according to the applicable plans.

Returning to Work after Leave

Upon returning to work from Family Medical Leave, employees who were absent due to their own serious health condition must present a fitness for duty certification from their health care provider stating they are able to return to work. Once it is demonstrated that you are able to return to work you will be reinstated to your position unless that job is no longer available. If it is not available, you will be placed in an equivalent position for which you are qualified.

To help us plan for your return from leave, we request at least two weeks' notice before your expected return date.

If you do not report back to work within 3 days at the end of a medical leave, we will assume that you have resigned.

WORKING PARENT RIGHTS

Minnesota Pregnancy and Parental Leave Law

WCS complies with the Minnesota Pregnancy and Parental Leave Law governing parental leave rights. The Minnesota Pregnancy and Parental Leave Law provides eligible employees with up to twelve work weeks of unpaid leave for the birth or adoption of a child. This leave can also be used to cover prenatal care, incapacity due to pregnancy, childbirth, or related conditions for female employees.

The employee must have worked for WCS for at least 12 months preceding the request; and for an average number of hours per week equal to one-half the full-time equivalent position in the employee's job classification during the 12-month period immediately preceding the leave.

An employee should request a leave in writing and submit it to the appropriate manager and Human Resources at least 30 days prior to the leave. The leave may begin anytime within 12 months after the birth or adoption of a child, or within 12 months after the child leaves the hospital, if the child remains in the hospital longer than the mother.

Leave is unpaid unless the employee uses available paid time off with the terms applicable to that benefit. An employee who receives group insurance coverage may retain the same insurance that applied before the leave commenced. To continue coverage employees must continue to pay all employee contributions throughout the leave. Employees who are not receiving paychecks from which deductions may be made must send their portion of the premium to WCS either in full, in advance, or in installments by each payday for which an associate contribution to the premium is due. Failure to pay the associated contribution may result in cancellation of coverage.

An employee eligible for leave will be restored to his or her prior position or to a position with equivalent pay, benefits and other terms and conditions of employment. WCS cannot guarantee that an employee will be returned to his or her prior position. WCS will determine whether a position is an "equivalent position."

Failure to return to work within 3 days at the conclusion of the leave may result in termination of employment as of the last date worked prior to the leave and may necessitate repayment of any insurance premiums, if applicable, paid for by WCS during the leave.

Pregnancy Accommodations

WCS will provide reasonable accommodations to an employee for health conditions related to pregnancy or childbirth if she so requests, with the advice of her licensed health care provider or certified doula, unless doing so would impose an undue hardship on the company. "Reasonable accommodation" may include, but is not limited to, temporary transfer to a less strenuous or hazardous position, seating, more frequent restroom, food and water breaks, and limits to heavy lifting.

At a minimum, WCS will offer the following accommodations to the pregnant employee without requiring them to seek advice of her licensed health care provider or certified doula: more frequent restroom, food and water breaks; seating; and limits on lifting over 20 pounds.

WCS will not retaliate against an employee for requesting or obtaining accommodation under this section. Further WCS shall not require an employee to take a leave or accept an accommodation.

School Conference and Activities Leave

WCS grants employees up to a total of 16 hours unpaid leave per year to attend their children's school

conferences, classroom activities, childcare or other early childhood program. Employees may use paid time off.

Nursing Mothers

WCS complies with state law allowing employees who need to express breast milk for infant children reasonable unpaid break time. If possible, the employee's break time will run concurrently with any other break time already provided to the employee. WCS will make reasonable efforts to provide a room or other location that is shielded from view, free from intrusion from coworkers and the public and includes access to an electrical outlet for the employee to express her milk in privacy.

WCS will not retaliate against an employee for asserting her rights under this MN statute.

BONE MARROW DONOR LEAVE

An eligible employee is an employee who works an average of at least 40 hours per week. You may request leave to serve as a bone marrow donor if you are a match to someone needing the donation. Notify Human Resources that you need to take leave at least 30 days before the procedure is scheduled to take place. Written medical certification of the need for leave is also required.

Bone Marrow Donor Leave will be paid and may last up to 5 days, including any time needed for testing before the procedure. Leave will not generally be granted more than once in a 12-month period.

WCS will not retaliate against you for requesting or obtaining a Bone Marrow Donor Leave.

STANDARD OF CONDUCT

COMPUTER AND E-MAIL USAGE

WCS may give employees access to computers, computer files, the email system, and software to use in doing their work. Employees should not use a password, access a file, or retrieve any stored communication without authorization. To make sure that employees comply with this Policy, computer and email usage may be monitored.

We strive to maintain a workplace that is free of harassment and sensitive to the diversity of our employees. Therefore, we prohibit the use of computers and the email system in ways that are disruptive, offensive to others, or harmful to morale.

We prohibit displaying, downloading, or emailing sexually explicit images, messages, and cartoons. Other examples of unacceptable computer usage include (but are not limited to) ethnic slurs, racial comments, off-color jokes, or anything that may be seen by another person as harassment or disrespectful.

You may not use email to solicit others for commercial ventures, religious or political causes, outside organizations, or other non-business matters.

WCS purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless the software developer authorizes us, we do not have the right to reproduce the software for use on more than one computer.

You may only use software on local area networks or on multiple machines according to the software license agreement. WCS prohibits the illegal duplication of software and its related documentation.

INTERNET USAGE

WCS may provide employees with Internet access to help them do their jobs. This Policy explains our guidelines for using the Internet responsibly and productively. We limit Internet usage to job-related activities only and do not permit personal use.

All Internet data that is composed, transmitted, or received via our computer systems is considered to be part of our official records. This means that it is subject to disclosure to law enforcement or other third parties. Therefore, you should always make sure that the business information contained in Internet email messages and other transmissions is accurate, appropriate, ethical, and lawful.

The equipment, services and technology that you use to access the Internet are always the property of WCS. Therefore, WCS reserves the right to monitor Internet traffic. We also reserve the right to retrieve and read any data that is composed, sent, or received through our online connections or is stored in our computer systems.

We do not allow data that is composed, transmitted, accessed, or received via the Internet to contain content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any employee or other person.

Examples of unacceptable content include (but are not limited to) sexual comments or images, racial slurs, gender-specific comments, or other comments or images that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

WCS does not allow the unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet. As a general rule, if you did not create the material, do not own the rights to it, or have not received authorization for its use, you may not put the material on the Internet. You are also responsible for ensuring that a person sending material over the Internet has the appropriate distribution rights.

Before you download or copy a file from the Internet, you should take the necessary anti-virus precautions. WCS requires that all downloaded files be checked for viruses. All compressed files must be checked for viruses both before and after decompression.

Employees whose Internet usage violates laws or WCS policies are subject to corrective action, up to and including termination of employment. Employees may also be held personally liable for any violations of this Policy.

The following are examples of some actions and activities that are prohibited and which could result in corrective action up to and including dismissal:

- Sending or posting discriminatory, harassing, or threatening messages or images.
- Using the organization's time and resources for personal gain.
- Stealing, using, or disclosing someone else's code or password without authorization.
- Copying, pirating, or downloading software and electronic files without permission.
- Sending or posting confidential material, trade secrets, or proprietary information outside of the organization.
- Violating copyright law.
- Failing to observe licensing agreements.
- Engaging in unauthorized transactions that may incur a cost to the organization or initiate

unwanted Internet services and transmissions.

- Sending or posting messages or material that could damage the organization's image or reputation.
- Participating in the viewing or exchange of pornography or obscene materials.
- Sending or posting messages that defame or slander other individuals.
- Refusing to cooperate with a security investigation.
- Jeopardizing the security of the organization's electronic communications systems.
- Sending anonymous email messages.
- Engaging in any other illegal activities.

SOCIAL MEDIA POLICY

At WCS, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

GUIDELINES

In the rapidly expanding world of electronic communication, *social media* can mean many things. *Social media* includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with WCS, as well as any other form of electronic communication.

The same principles and guidelines found in WCS policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects customers, suppliers, people who work on behalf of WCS or WCS's legitimate business interests may result in disciplinary action up to and including termination.

Know and follow the rules

Carefully read these guidelines, the WCS Statement of Ethics Policy, the WCS Internet Usage Policy and the Workplace Harassment Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful

Always be fair and courteous to fellow employees, customers, suppliers or people who work on behalf of WCS. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Open Door Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, employees or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts

that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Be honest and accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about WCS, fellow employees, customers, suppliers, people working on behalf of WCS or competitors.

Post only appropriate and respectful content

- Maintain the confidentiality of WCS trade secrets and private or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Respect financial disclosure laws. It is illegal to communicate or give a “tip” on inside information to others so that they may buy or sell stocks or securities. Such online conduct may also violate the Insider Trading Policy.
- Do not create a link from your blog, website or other social networking site to a WCS website without identifying yourself as a WCS employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for WCS. If WCS is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of WCS, fellow employees, customers, suppliers or people working on behalf of WCS. If you do publish a blog or post online related to the work you do or subjects associated with WCS, make it clear that you are not speaking on behalf of WCS. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of WCS.”

Using social media at work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Internet Usage Policy. Do not use WCS email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is prohibited

WCS prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Media contacts

Employees should not speak to the media on WCS’s behalf without contacting Human Resources, or the company owner. All media inquiries should be directed to them.

For more information

If you have questions or need further guidance, please contact your HR representative.

USE OF PHONE AND MAIL SYSTEMS

The proper use of telephone etiquette reflects our commitment to a high standard of customer service. In addition, defined telephone skills are essential to the efficient operation of WCS. We have, therefore, established the following standards to be followed when using the telephone during business hours.

Business Calls

- Incoming calls should be answered promptly and courteously.
- Calls should be forwarded to the appropriate person as quickly as possible. If unavailable, a detailed message should be taken for a follow-up phone call.
- Callers should not be placed on hold for long periods of time. It is important to check with the caller periodically to assess if they want to continue to hold.
- Telephone messages are to be returned in a timely manner.

Personal Calls/Texting

- Personal calls/texting are not permitted on WCS time unless there is an emergency.
- Personal phone calls/texting, made on phones other than WCS issued phones should be made during break time, unless there are extenuating circumstances.

It is not acceptable to use WCS postage for your personal mail. The postage is intended only for official business-related mail.

SMOKE FREE WORKPLACE

In keeping with WCS's intent to provide a safe and healthful work environment, smoking is prohibited throughout the workplace. This includes office, shop, WCS vehicles and job sites.

This Policy applies equally to all employees as well as to our customers and visitors.

WORKPLACE VIOLENCE PREVENTION

WCS is committed to preventing workplace violence and to maintaining a safe work environment. We have adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that might occur during business hours or on our premises.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. We prohibit firearms, weapons, and other dangerous or hazardous devices and substances from the premises of WCS.

WCS will not tolerate conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, including off-duty periods. This includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local law.

All threats of (or actual) violence, either direct or indirect, should be reported as soon as possible to your supervisor or any other member of management. This includes threats by employees as well as threats by customers, vendors, solicitors, or anyone else. When reporting a threat of violence, you should be as specific and detailed as possible.

Be sure to report any suspicious person or activities as soon as possible to a supervisor. Do not place yourself in peril. If you see or hear a commotion or disturbance near your work area, do not try to intercede or see what is happening.

We will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the person who made the report will be protected to the extent practical. To maintain workplace safety and the integrity of its investigation, WCS may suspend an employee, either with or without pay, pending investigation.

Any person who violates these guidelines will be subject to corrective action, up to and including termination of employment. Violations include making a threat of violence or actually committing a violent act.

If you are having a dispute or difference with another employee, we encourage you to discuss it with your supervisor or Human Resources before the situation escalates into potential violence. WCS is eager to assist in the resolution of employee disputes and we will not discipline an employee for raising these types of concerns.

POLICY PROHIBITING WEAPONS IN THE WORKPLACE

WCS is committed to providing its employees, contractors, customers, vendors and other visitors with an appropriate and safe workplace environment. As a part of the process, WCS prohibits all employees from carrying, concealing, using or storing any weapons or ammunition on WCS premises, vehicles or a client's property WCS provides to employees.

Employees are also prohibited from carrying, concealing, using or storing any weapon or ammunition at any time the employee is acting within the course and scope of his or her employment, regardless of whether the employee is on WCS premises or a client's premises, or whether the employee is using an WCS provided vehicle. WCS "premises" includes all buildings, storage areas, work areas and outdoor lots. A "weapon" includes, without limitation guns, pistols, knives, clubs and any other item the purpose of which is to threaten or inflict bodily harm upon any person.

This policy applies, without limitation, to concealed weapons for which a valid permit has been issued and to all persons to whom a valid permit to carry a concealed weapon has been issued. An employee who has a valid permit to carry a concealed weapon may, when not acting within the course and scope of his or her employment, carry or possess that weapon in the parking area WCS provides for employees, but in no other location on WCS premises or a client's premises. Weapons other than concealed weapons for which a valid permit has been issued are prohibited in the employee parking area. Employees who violate this policy are subject to corrective action up to and including termination of employment.

WCS's policy banning weapons and ammunition from the premises also applies to non-employees, including those with proper licenses to carry a concealed weapon. Persons with lawful permits to carry guns may carry or possess the weapon in the parking areas provided by WCS, but in no other location on WCS's premises.

GENERAL INFORMATION

Dress Code

The objective of WCS is to allow our employees to work comfortably in the workplace, and still project a professional image for our customers, potential employees, and community visitors. Torn, dirty, or frayed clothing is unacceptable. All seams must be finished. Any clothing that has words, terms, or pictures that may be offensive to other employees is unacceptable. Clothing that is sexually provocative that reveals too much cleavage, your back, your chest, your stomach or underwear is not appropriate for a place of

business. If clothing fails to meet these standards, as determined by the employee's supervisor and Human Resources, the employee will be asked not to wear the inappropriate item to work again. If the problem persists, the employee may be sent home to change clothes and will receive a verbal warning for the first offense. Progressive corrective action will be applied if dress code violations continue.

Driver's License Requirements

(Routed, Swing, Service Vehicles, Grounds Maintenance, Part-time and Occasional)

All drivers are required to have in their possession a current, valid Minnesota Commercial Driver's License (CDL), with the exception of Grounds Maintenance personnel. Prior to your employment we will obtain a copy of your motor vehicle record (MVR) from the State Department of Transportation. This will verify that you possess a valid license and indicate the number and type of violations on your record for the previous five (5) years.

1. Drivers are required to report to their supervisor any change in the status of their license by the first working day following knowledge of that change. Failure to inform the supervisor of expiration, loss of license or change in license status (restriction, revocation or suspension) will result in a 5-day suspension without pay.
2. Drivers are responsible for the renewal of their license as required by state law.
3. Drivers with licenses requiring the wearing of prescription glasses or contact lenses must comply with those requirements.
4. Expired, revoked or suspended licenses will require suspension from employment until the license is reinstated and may result in termination of employment.
5. All off -duty motor vehicle violations must be reported to your supervisor no later than the next working day following the violation.
6. All drivers convicted of DWI will warrant termination of employment.
7. At a minimum, once each year, records will be obtained on all drivers' licenses. A continuing or increasing record of moving violations will subject an employee to, in the following order, probation, suspension and finally discharge.

Any driver whose MVR indicates two (2) or more moving violations (other than DWI) in any twelve (12) month period, will be placed on probation for one (1) year from the date of the last violation. Any additional moving violation during the probation period will warrant a three (3) day suspension without pay. Subsequent violations during the probation period may warrant, at the employer's option, additional suspension or discharge.

We are obligated to establish standards of insurability for employees who operate company vehicles.

This requires us to (1) Verify that each operator of a company vehicle possesses and maintains the proper, valid class license for the vehicle he/she operates; (2) Be aware of the status and number of moving violations on those licenses to ensure that the conduct of our business does not adversely affect the general public, and; (3) Demonstrate that we have, when appropriate, taken the necessary steps - probation, additional training on problem occurrence(s), suspension or termination -to reduce or eliminate any substantial risk to the general public.

Housekeeping

Work areas should remain clean and orderly. Papers in the office shall be removed from desk and credenzas each night prior to departure. Tools, parts and equipment shall be restored to their proper location. Vehicle cabs should be kept in a neat, orderly, uncluttered condition.

Employees using the lunchroom, conference rooms or outdoor facilities for meetings are responsible for cleanup. All areas should remain clean and free of clutter. Chairs and tables should be returned to their original positions.

The rule is -if you make a mess, clean it up.

Physical Examinations

As a condition of employment, all applicants for safety sensitive positions are required to undergo and pass a physical examination (DOT and other) and drug screen at a clinic designated by the company. In addition, employees may be required to undergo annual or periodic drug screens as determined by the drug and alcohol policy.

Annual hearing testing is required of employees who may be exposed to noise levels above accepted standards.

In addition, other examinations may be required during the course of employment; for example, after an accident or injury to determine if the employee is physically able to return to full, unrestricted work; following a serious health condition, or if there is reasonable suspicion that an employee is under the influence of alcohol or drugs.

Recycling

West Central Sanitation is committed to recycling and to serving the people of our communities in a responsible manner. It is our duty to educate them on the preparation of commodities and which ones are acceptable in our programs. We must also be aware of the public perceptions about recycling and assure them that we are "doing the right thing".

Residential Recycling: It is our policy not to throw recyclables into the trash. If recyclables are contaminated, they are not to be thrown into a trash truck or into the customers trash can. If the commodities are unacceptable or contaminated, it is our responsibility to leave an educational brochure with the rejected materials explaining why we did not pick them up. Wet commodities are not considered contaminated and are acceptable in our program.

Commercial Recycling: It is our policy not to throw recyclables into the trash. If recyclables are contaminated, it is our responsibility to contact the commercial business and educate them on what is acceptable and how to prepare the materials for our program. Only after we have received permission from the commercial business are we allowed to empty their recycling containers into our trash truck.

Violation of any portion of the above-mentioned policies is not acceptable and will be subject to disciplinary action up to and including termination. We will guarantee to our customers, both public and private, that this policy will govern our everyday practice of service to them.

Solicitation and Distribution

Employees may not engage in solicitation of any kind during their working time or during the working time of the employee being solicited. Employees may not engage in the distribution of literature of any kind

during their working time or during the working time of the employee receiving the literature. Persons who are not company employees may not solicit or distribute literature for any purpose anywhere on company property. Working time excludes authorized break or meal periods, and working areas excludes break rooms.

Safety Policy

As professionals we must, at all times, conduct ourselves in a manner to avoid conditions that are unsafe or that contribute to the risk of an accident, injury or damage. Examples of unprofessional and unsafe conduct include frequent accidents or injuries, incidence of gross negligence, scavenging or salvaging from waste material, and loitering around landfills and other disposal sites. Horseplay, fighting and possession of firearms or other weapons are also prohibited.

Believing that safety, health and economic opportunity are of great importance to every employee of West Central Sanitation, Management is dedicated to the protection and conservation of its human, physical and financial resources.

The elimination of unnecessary loss is a responsibility we all share. The conservation of our company's resources, including the safety of every employee, is a matter of greatest concern that demands the maximum effort of each employee.

All personnel have a responsibility to implement this safety program to eliminate health hazards or disaster for the most valuable resource and investment we have --the lives of our employees.

Cooperation and support of every employee is necessary if we are to have a truly effective Safety and Loss Control Policy.

West Central Sanitation complies with all federal, state and local regulations related to occupational safety and health. We do not consider any part of our operations more important than that of the occupational safety and health of our employees.

Your cooperation in detecting hazards and other potential losses and, in turn, controlling them is a condition of your employment.

Inform your supervisor immediately of any situation beyond your ability and authority to correct.

Workplace Privacy and Company Property

Employees do not have a right to privacy in their workspaces or in any other property belonging to WCS. WCS reserves the right to search WCS property at any time without warning to ensure compliance with our policies including those that cover employee safety, workplace violence, harassment, theft, drug and alcohol use, and possession of prohibited items. WCS property includes but is not limited to lockers, desks, file cabinets, storage areas and work spaces.

Work Product Ownership

All WCS employees must be aware that the Company retains legal ownership of the product of their work. No work product created while employed by WCS can be claimed, construed, or presented as property of the individual, even after employment by WCS has been terminated or the relevant project completed. This includes written and electronic documents, audio and video recordings, system code, and also any concepts, ideas, or other intellectual property developed for WCS, regardless of whether the intellectual property is actually used by the Company.

Although it is acceptable for an employee to display and/or discuss a portion or the whole of certain work product as an example in certain situations (e.g., on a resume, in a freelancer's meeting with a prospective client), one must bear in mind that information classified as confidential must remain so even after the end of employment, and that supplying certain other entities with certain types of information may constitute a conflict of interest. In any event, it must always be made clear that work product is the sole and exclusive property of WCS. Freelancers and temporary employees must be particularly careful in the course of any work they discuss doing, or actually do, for a competitor of WCS.

Wage Disclosure Protections

WCS will not prohibit employees from discussing his or her wages as a condition of employment. Further WCS will not require an employee to sign a waiver or other document that takes away their right to disclose their wages.

WCS will not take any adverse employment action against an employee for disclosing the employee's own wages or discussing another employee's wages which have been disclosed voluntarily.

However nothing in this section shall be construed to:

- Create an obligation for the employer or employee to disclose wages;
- Permit an employee, without the written consent of the employer, to disclose proprietary information, trade secret information, or information that is otherwise subject to a legal privilege or protected by law;
- Diminish any existing rights under the National Labor Relations Act under United States Code, title 29; or
- Permit the employee to disclose wage information of other employees to a competitor of their employer.

We will not retaliate against an employee for asserting their rights or remedies under MN Statute.

Personnel File

WCS maintains a personnel file on each employee. The purpose of this file is to allow us to make decisions and take actions that are personally important to you, including notifying your family in case of emergency, calculating income tax deductions and withholding, and paying for appropriate insurance coverage. It is impossible to list the types of documentation we keep in your personnel file. We do not keep medical records or work eligibility forms in your personnel file. Those are kept separately.

Personnel files are the property of WCS. Generally, only supervisors and management personnel of WCS who have a legitimate reason to review information in a file are allowed to do so in accordance with state law.

Employees who wish to review their own file should contact the Human Resources Department. With reasonable advance notice, employees may review their own personnel file one time in any six month period.

Within seven working days of receiving your request (or within 14 working days if your personnel records are stored out of state), we will make available for your review either your original file or an accurate copy of your file. You will have access to your file during normal operating hours either at your job site or at a nearby location. We may require that this review take place in the presence of a company representative. After you have had an opportunity to review your file, you may make a written request for a copy of the record. If you make such a request, we will provide you with a copy of your file at no charge to you.

After your separation from employment (for whatever reason), you may review your file once annually for as long as we maintain the record. If you make a good faith, written request to review your file after your employment with us has ended, we will provide a copy of your file at no cost to you.

If, after reviewing your file, you dispute specific information contained in the record, we may agree to remove or revise the disputed information. If no such agreement is reached, you are entitled to submit a written statement of no more than five pages explaining your position. This position statement will be included in your file, along with the disputed information, for as long as we maintain the record.

We will not retaliate against you for asserting your rights under the Minnesota Personnel Records Statute.

WORKERS' COMPENSATION INSURANCE

WCS provides a comprehensive workers' compensation insurance program at no cost to team members. This program covers any injury or illness sustained in the course of employment requiring medical, surgical, or hospital treatment. Coverage for chiropractic, physical therapy and other non-immediate care services require pre-certification by our insurance carrier.

Subject to applicable legal requirements, workers compensation insurance provides benefits for time lost from work due to a work-related injury. A team member will receive approximately 2/3 of his or her weekly wage starting with the 4th day away from work. However, the first 3 days will also be covered if the team member is unable to return to work within 10 calendar days of first missing work.

Team members who sustain work-related injuries or illnesses should inform their supervisor or member of the HR team immediately. No matter how minor an on-the-job injury might appear, it is important that it be reported immediately. This will enable an eligible team member to qualify for coverage as quickly as possible and reduce the risk of challenge by our insurance carrier.

Neither WCS nor the insurance carrier will be liable for the payment of workers compensation benefits for injuries that occur during a team member's voluntary participation in any off-duty recreational, social, or athletic activity.

If any WCS employee is injured on the job a mandatory drug and/or alcohol test may be required.

TERMINATION OF EMPLOYMENT

Termination of employment is an inevitable part of personnel activity within any organization and many of the reasons for termination fall into one of four categories. These are some of the most common circumstances for employment terminations:

- Resignation – voluntary employment termination initiated by an employee.
- Discharge – involuntary employment termination initiated by WCS.
- Layoff – involuntary employment termination initiated by the organization for non-corrective reasons.
- Retirement – voluntary employment termination initiated by the employee meeting age, length of service and any other criteria for retirement from the organization.

WCS and its employees share a working relationship defined, as *employment-at-will*. Simply stated, *employment-at-will* means that in the absence of a specific written agreement, you are free to resign at any time, and WCS reserves the right to terminate your employment for any reason (which does not violate any applicable law) with or without prior notice.

If you wish to resign, you are requested to notify your manager of your anticipated departure date at least two weeks in advance. This notice should be in the form of a written statement.

A meeting between you and your immediate manager will take place prior to your last day at the WCS. A health insurance extension of benefits under the COBRA regulations is available. Credit cards, office keys, company equipment, and vehicle keys must be returned at this time.

If you leave WCS in good standing, you may be considered for re-employment. In the case that you are rehired, you will be considered a new employee with respect to vacation time, benefits and seniority, and may be hired at a new rate of pay.

West Central Sanitation

Employee Acknowledgment Form

I acknowledge that I have received a copy of the WCS Employee Handbook. It is my responsibility to read and familiarize myself with the handbook. I agree that if there is any information in this Employee Handbook that I do not understand, I will seek clarification from Human Resources.

I understand that WCS is an “at will” employer and that either WCS or the employee can terminate the employment relationship at any time, with or without cause. It also is understood that neither party has an obligation to base a decision to terminate the employment relationship on any reason other than the decision not to continue the relationship. It is further understood that nothing contained in this Handbook is intended to create nor shall be construed as creating a contract of employment, express or implied, or a guarantee of employment for a definite or indefinite term.

In addition, I understand that this Employee Handbook states WCS’s policies, practices and procedure in effect on the date of publication. I understand that nothing contained in this Employee Handbook may be construed as creating a promise of future benefits or a binding contract with WCS for benefits or for any other purpose. I also understand that these policies, practices and procedures are continually evaluated and may be amended, modified or rescinded at any time. My signature on this page serves as an acknowledgement of my responsibility to keep this Employee Handbook current as changes are issued.

Please sign and date this receipt and return it to Human Resources.

Date: _____

Name: _____

Printed Name: _____

Good Neighbors You’ve Come To Trust