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Policy Number 010

BACHMAN MACHINE COMPANY CORPORATE POLICY

Effective Date: 03-01-2000 Supersedes Policy No 010 Date:01-01-2000

SUBJECT: OPEN DOOR POLICY

Objective: The objective of this policy is to provide the guidelines and procedures necessary for an employee to comfortably and confidentially resolve any work-related issues, problems or complaints. The use and observance of this policy should provide minimal interruption of work efforts and the resolution of issues, problems or complaints to the satisfaction and benefit of both the Company and the employee.

Scope: The scope of this policy applies to all Bachman Machine Company locations and to all subsidiary Operations.

Policy Statement: Bachman Machine Company is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which problems, complaints, suggestions or questions receive a timely response from Bachman Machine Company supervisors and management. Good employee-employer relationships can exist only if employees believe that they have been treated equitably and fairly within the management of policies, procedures, and the actions that influence this relationship. The Company recognizes that there are going to be occasions when an honest difference of opinion will occur regarding the interpretation and application of policies, procedures, rules of conduct and actions. To assist with the resolution of these problems, issues and/or complaints, Bachman Machine Company operates with an "Open Door" Policy that provides for problem resolution.

The following procedure has been established to provide an effective and acceptable means for an employee to bring problems, issues or complaints to the attention of management. If a situation occurs when an employee believes that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to make use of the following steps. These procedures will assist in coming to a decision that satisfies the needs of both management and the employee.

The employee may discontinue the procedure at any step.

Problem Resolution Procedure:

1. The employee presents the perceived or actual problem to the immediate supervisor within ten (10) calendar days, after incident occurs. If the supervisor is unavailable or employee believes it would be inappropriate to contact that person, employee may present the issue to Human Resources Manager or any other member of management.

2. The supervisor responds to the problem during discussion or within ten (10) calendar days, after consulting with appropriate management personnel, when necessary. The supervisor documents discussion.

3. The employee presents the problem to Human Resources Manager within ten (10) calendar days, if problem is unresolved.

4. The Human Resources Manager counsels and advises the employee, assists in documenting the problem in writing, visits with the employee's manager(s) and, if necessary, directs the employee to the Chief Executive Officer for review of problem.

5. The employee presents the problem to the Chief Executive Officer in writing.

6. The Chief Executive Officer reviews and considers the problem and informs the employee of his decision within ten (10) calendar days, and forwards copy of written response to Human Resources Manager for employee's file. The Chief Executive Officer has full authority to make any adjustments deemed appropriate to resolve the problem.

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment, and helps to ensure everyone's job security.

Retaliation: It is understood that any employee who elects to use the "Open Door" policy and procedures will be treated courteously and that the issue or complaint will be handled as confidentially as possible. Only those members of management with a "need to know" and who are in the employee's chain of command should have access or knowledge of the issue or complaint. At no time should any employee feel concerned or threatened because of using the "Open Door" policy for there shall be no form of retaliation against the employee who makes use of the policy.

Documentation: Any issue, problem or complaint heard under the “Open Door” policy will require documentation as to the nature of the issue, problem or complaint and how it was resolved. Generally, the resolving party is responsible for providing the Human Resources Department with this documentation. The issue or complaint documentation file will be a separate file and will not become part of an employee’s regular personnel file. Complaint and resolution documentation will be maintained in a separate file by the Human Resources Manager and used only as a basis for recommending changes in current or future management policies or procedures.

Management Support: All members of the Company management team are expected to fully support the “Open Door” policy and to encourage its use.

Effect: The effect of this policy shall be to:

- Designate the proper procedures and logical “chain-of-command used for the resolution of employee issues, problems or complaints.
- Show that management supports this program and has a genuine concern for the identification, interpretation; discussion and resolution of employee issues, problem or complaints.
- Identifies the President and CEO as the final decision authority in the resolution of any employee issue, problem or complaint not resolved by the lower levels of supervision.