

Employee Handbook

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Welcome to The Comex® Group!

We are excited to have you as part of our team. You've joined an organization with a long history of excellence. The Comex Group brands have been offering outstanding paints and coatings throughout North and Central America for more than a century, setting industry standards for quality and innovation. We depend on all our employees to uphold our tradition of superior products and superior service. Your knowledge, passion and dedication are the fuel that drives our success. Welcome aboard. I hope that you will have a rewarding career with us, and we look forward to your contributions

This handbook is meant to guide you in your work performance and to set forth rules and regulations, which are necessary to operate a safe and efficient workplace, as well as inform you of the privileges and benefits to which you are entitled. The provisions of this handbook apply to all employees of The Comex Group. This handbook supersedes all other handbooks, policies, and previous practices of The Comex Group.

Except for the at-will policy, this handbook does not constitute an express or implied employment contract. As a matter of company policy, employees are hired under the doctrine of at-will employment, which means employment and compensation, as a matter of contract between an employee and the company, may be terminated at any time for any reason, by the employee or the company at the will of either party. The Comex Group reserves the right to direct and control the operation of its business, including but not limited to the management, assignment, scheduling, and direction of the workforce as well as the right to transfer, promote, demote, discipline, discharge, and/or take any other employment action with an employee with or without cause or prior notice.

The Comex Group reserves the right to modify, rescind, delete, or add to the provisions of this handbook at its sole discretion. The Comex Group will attempt to notify employees of any such changes when they occur. The Comex Group also reserves the right to interpret the policies in this handbook and to deviate from them when, in its discretion, it determines it is appropriate.

Our History - The Comex Group Story

The Comex Group is a leading manufacturer and distributor of quality paints and coatings. Founded in 1956 as a small family company in Mexico City, The Comex Group is now the fourth largest architectural paint manufacturer in North America. We offer a complete range of paint products to meet the needs of customers of all sizes and types, from the do-it-yourself homeowner to the largest commercial contractors. Our products are manufactured and marketed through a unique group of regional companies, with over 3,300 locations, from Canada to Panama.

The Comex Group's companies in the United States and Canada were formerly part of Professional Paint, Inc. (PPI), including Frazee Paint, Kwal Paint, Parker Paint, Stellar Kwal Paint, General Paint, Ideal Paint and Duckback Products. PPI was brought into The Comex Group in October 2004, bringing with it over 100 years of heritage and paint expertise. Selling primarily to the professional contractor market, these regional manufacturers and marketers have long been known for their outstanding quality, product knowledge and customer service, with a network of nearly 375 company owned and -operated service centers.

We're passionate about working in partnership with customers to formulate architectural paints, industrial coatings, automotive finishes, waterproof coatings, and wood-care products that set the industry standard for protection, durability, beauty, and quality. Our employees are the cornerstone of our commitment to providing the highest levels of expertise and service. Your creativity, talent and dedication are what enable us.



What The Company Expects From You

CODE OF CONDUCT

Dear Members of the council and co-workers,

At The Comex Group, we are proud to employ valuable people who aim for improvement and strive to achieve it each and every day. I hope you will take the time to read through this Code of Ethics and Conduct -a guide of behavior and development that is based upon the personal and institutional values found within our company.

The values of The Comex Group are the foundation of every one of our actions. For this reason it is the responsibility of all to adhere to these values in order to continue to be a team of honest, upright, trustworthy, and successful individuals.

Keep in mind that behaving in an ethical way is important for any organization and in our case is fundamental, for it nurtures one of our key missions to service our customers and their invaluable trust.

I invite you to explore and analyze what is established in this Code of Ethics and Conduct. Let us continue to make The Comex Group a place in which you and I can grow, both as people and as professionals, performing a job that we enjoy and feel passionate about.

Alfredo Achar Tussie

Executive President of the Board of Directors, The Comex Group

Our Philosophy

In order to achieve harmony in our workplace, it is essential that we adhere to certain ethical principles of conduct. If we develop an atmosphere of integrity, respect and honesty, we are exercising values that are fundamental to accomplishing that sense of harmony. Living according to these values is essential for our work culture and a fundamental part of our organization. At The Comex Group, we have gathered and formalized these behaviors and they are reflected in this Code of Ethics and Conduct.

The philosophy of The Comex Group is our way of thinking and acting. Within our philosophy, our mission and vision are defined as well as our institutional values.

Mission

The Comex Group is committed to engage with our customers while creating superior value in our products and service.

Vision

The Comex Group is a company focused on its customers, leading all of the markets and segments in which it participates with committed distributors that are experienced and knowledgeable. We are passionate and have the desire to set the industry standard for excellence.



Values

Our company is the result of the intelligent effort of many years of service and of many people whose legacy we are committed to honor by observing their values while building our future. It is for this very reason that our values are, at the same time, a homage to a past we are proud of and the key toward a successful future. These values will guide our decisions and actions and assist us in building a company that places human dignity as a top priority.

Integrity

We believe in transparency. We make ourselves responsible for our decisions and actions as well as their consequences. We are aware that in honesty and in ethical behavior lies the basis of true success for our organization.

The person who displays the value of integrity is one who:

- Is fair with all people
- Is consistent between what he/she says and does
- Admits his/her mistakes and holds responsibility for the outcome of those mistakes
- Speaks the truth
- Honors his/her commitments
- Is open to feedback
- Treats everyone respectfully, without exceptions
- Properly uses and cares for the resources of the company
- Assertively expresses what he/she thinks
- Solves difficult situations with everyone through dialogue
- Is someone who can be trusted

Service

We show sensitivity for the needs of our internal and external customers. Through the Service value we offer a positive and permanent attitude of commitment and cordiality.

That is why, for us, generating solutions that timely satisfy customers' needs is a priority.

The person who lives according to the Service value is one who:

- Is welcoming toward customers, clients and co-workers
- Identifies the reasons for the customer's request
- Listens attentively to internal customers
- Speaks formally and professionally
- Asks specific questions in order to identify the requirements regarding quality, cost, delivery times and models
- Defines the terms of delivery with the customer before making any commitment
- Advises and offers different alternatives clearly explaining the benefits and limitations of the product or service
- Negotiates the terms of delivery and quality of the product or service with the customer
- Verifies together with other areas that the service is carried out as it was agreed with the customer in their order
- Measures the satisfaction of the service received by the customer

Innovation

There is always a possibility of finding new and better ways to accomplish objectives. At The Comex Group, we value creativity at work, versatility and the capacity to adapt.



The person who lives according to the Innovation value is one who:

- Finds new ways to accomplish tasks
- Presents new and original alternatives as a means to solve problems or improve processes
- Implements new ideas, services or processes
- Promotes continuous improvement
- Suggests new business opportunities
- Is a creative and innovative person
- Generates creative and innovative responses when the situation requires it
- Adjusts to changes within our organization

Intelligence

We are a company that learns, generates and shares knowledge; that analyzes, questions and responds while aiming to make every journey a learning experience.

The person who lives according to the Intelligence value is one who:

- Completes a training plan when it is assigned to them
- Applies the knowledge that has been acquired
- Shares their knowledge
- Supports and promotes changes in the company through behavior and example
- Acknowledges others' point of view
- Constantly seeks opportunities for self-development and the development of their co-workers

Passion

We aim to work with intensity, enthusiasm, energy and good humor. We create motivating work atmospheres with contagious energy.

The person who lives according to the Passion value is one who:

- Maintains a constant level of efficiency and has a good disposition towards work
- Is both committed and motivated
- Encourages others to perform their tasks with enthusiasm
- Spreads their positive attitude and energy onto others
- Makes positive comments to others in difficult situations
- Is consistent in the achievement of their objectives and responsibilities

Profitability

We guide our actions and decisions towards the generation of utilities and the growth of our businesses.

The person who lives according to the Profitability value is one who:

- Makes an appropriate use of the company's resources such as: safety equipment, machinery, facilities, time, raw material and phones, etc.
- Respects the norms and procedures of security, operations and those related to environmental issues
- Delivers quality products, jobs and services that satisfy customers
- Promotes savings and constantly looks for alternatives that reduce costs
- Optimizes processes in order to raise productivity

Community

We promote giving and receiving and wish to inspire a sense of pride in all members of our organization. We act as one and try to do what is best for the group as a whole.



The person who lives according to the Community value is one who:

- Grants recognition to those who deserve it without claiming the ideas of others as their own
- Gives public recognition
- Reprimands or points out mistakes in private
- Respects the time of others by being punctual in their appointments
- Collaborates in projects or tasks of others in search of a common benefit
- Gives feedback in a respectful way
- Takes into account different points of view
- Refers to other persons by their name, without using nicknames in a pejorative or mocking manner
- Treats everyone as equals and with respect
- Generates and promotes positive relations and integrates collaborative teams
- Listens empathically to everyone

Social Responsibility

We aim to establish a sustainable and positive relationship with the communities in which we operate. We are aware that society is the basis of entrepreneurial activities and we are committed to establish a mutual-benefit relationship with it.

The person who lives according to the Social responsibility value is one who:

- Actively collaborates with society (in general and in crisis)
- Respects laws and traditions of the community in which they work
- Shows respect and tolerance towards different ideologies, cultures, religions, sexual orientations, socio-economical levels, gender and different capacities, etc.

Environmental Care

We must constantly work towards creating a participative society that acts in favor of an ecological balance and a commitment to our environment.

The person who lives according to the Environmental care value is one who:

- Adheres to indicated procedures that protect the environment
- Properly handles and disposes of dangerous residues
- Places garbage in its proper place
- Separates trash according to the policies and procedures of their department
- Reports any inconsistencies that might affect the environment
- Puts used batteries in special containers
- Recycles paper and/or other waste
- Avoids smoking

By living according to our values, we grow as individuals and help to consolidate a successful and honorable company.

Objective and Scope

The Code of Ethics and Conduct of The Comex Group communicates our mission, vision and values, providing us the tools to live by and to protect those initiatives every day.

The main objectives of Our Code of Ethics and Conduct are:

- To establish the norms of ethics and conduct that we must understand and observe as members of the council and employees of The Comex Group, both in relations with our co-workers as well as with everyone else



- Helping to seed the philosophy of The Comex Group in each of us, so that with it we foster, develop and live with positive attitudes and habits that allow us to have harmonious work relations and a healthy work atmosphere
- Making public the different ways in which we can make a difference in order to protect the philosophy of The Comex Group

Scope

What is written in this Code of Ethics and Conduct is mandatory for all of the members of the organization, including the Board of Directors, shareholders, collaborators (directors, managers and employees), of all the companies of The Comex Group, suppliers and customers - all of which have the responsibility to know it, observe it and enforce its execution.

Norms of Conduct - General Aspects/Consequences

Besides observing the philosophy of our company that is contained in this Code, the Board of Directors, shareholders and employees of all the companies of The Comex Group, suppliers and customers must observe all internal and external laws and regulations. We also must adhere to the local laws and regulations, as well as those laws from places in which our company operates. We must not conduct ourselves in ways that are opposed to the interests of the customers or healthy commercial practices. It is our responsibility to engage in conduct that guarantees credibility and fosters the good reputation of the company.

At The Comex Group, we aim to maintain healthy relations between members of the council and workers, authorized dealers, customers, suppliers, providers, mass media and authorities.

As collaborators, we must:

1. Refrain from giving or following orders that go against the established policies and procedures or that contradict the laws and regulations in effect in the particular jurisdiction.
2. As supervisors, lead employees in a manner that mirrors established policies and procedures and adheres to legal requirements
3. Inform and, if possible, provide evidence about the violations we learn about to proceed with an investigation and possible disciplinary action
4. Report suspicious activities or circumstances which pose a risk to the reputation of the company
5. Ensure that the attention and treatment given to others is neither discriminatory nor preferential treatment
6. As members of the council, annually receive and approve a report made by the Ethics Committee indicating that they have verified that all the employees have understood this code and have signed the Letter of Agreement, as well as the proof of its compliance

Norms of Conduct - Individual Aspects/Consequences

At The Comex Group, we aim first and foremost, to support the individual and their dignity, good commercial practices and the interests of the group.

Discrimination

At The Comex Group, we disapprove of discrimination towards any person due to their race, religion, gender, color, age, nationality, citizenship, sexual preference, marital status, physical or mental disability, or any other categories or conditions protected by law, regarding recruitment, hiring, training, promoting, benefits and pay, punishments and other terms and conditions in the workplace.



Sexual Harassment

By sexual harassment we refer to those behaviors, be it physical or verbal, of a sexual nature that are inopportune and unsolicited and result in the creation of an intimidating or hostile environment within the workplace.

At The Comex Group, we disapprove and prohibit this gross misconduct due to the potential moral damage that it causes to the victims and because of the vicious effect that it might have on the reputation of the company.

The following conducts are examples of the type of behavior that is forbidden:

- Making insinuations that might be classified as sexual
- Offering work benefits in exchange of sexual favors
- Looks or gestures of the sexual kind
- Presenting explicit or suggestive material (pictures, posters, cartoons, etc)
- Making comments that denigrate a person using foul language, suggestive comments or jokes
- Making sexual comments, including erotic ones about the body of a person, using degrading words to describe a person, sending suggestive or obscene letters, messages or invitations

Harassment

By harassment we refer to abusive procedures, words or implicit messages and actions that affect the emotional and mental integrity of a person. At The Comex Group, we disapprove that any collaborator or advisor is hurt or annoyed by anyone due to their culture or any other condition protected by law.

The following conduct is forbidden:

- Isolation or indifference
- Rejecting communications
- Attacking the work conditions thus impeding the person from performing their work correctly
- Attacking the dignity of a person by humiliating them, through offensive body language, scolding others in front of one or more persons, misuse of personal or professional information
- Scolding others using foul language especially in a threatening or violent manner
- Damaging or destroying any work material
- Slandering others regarding alleged misconduct

Drug Abuse

Coming to the work place under the influence of any controlled substance or alcohol, as well as its use at the facilities of The Comex Group, except when medication has been lawfully prescribed by a health care provider.

Commercializing Products that are Not Authorized by The Comex Group

While on the premises of a The Comex Group facility, selling any product or service that has not been produced by The Comex Group is prohibited.



Conflict of interests

The employees of The Comex Group must be very cautious regarding commercial relations that may interfere, or that may seem to be interfering, with the obligation to act only in the interest of The Comex Group.

There is a conflict of interest when a director, employee or collaborator has a business relation with The Comex Group through companies owned by them or by their first and second-degree relatives; they are considered as linked companies. This conflict of interest must be reported to the Board of Directors through the Auditing Committee for its evaluation. Collaborators must inform the company about any kind of conflict or pressure to intercede in favor of a relative or linked company which may create an actual or potential conflict of interest.

All the advisors and collaborators of The Comex Group must avoid having interests or investments that facilitates them having an influence on decision-making and/or businesses of competitors. Some of the situations that may be considered as real or potential conflicts of interests are:

- When someone accepts the instruction of a representative or consultant of a company which is a competitor of The Comex Group
- When decision-making might benefit the employee himself or a related third-party to the detriment of The Comex Group
- When the employee uses the name and/or resources of The Comex Group for outside purposes, unless the required authorizations have been previously obtained as having a basis within this Code of Ethics and Conduct (for example, charities)
- When the advisor, director or employee provides a service or makes a purchase with a third-party, in conditions that are less favorable than those that could be obtained in the market and to the detriment of a company belonging or affiliated with The Comex Group and outside of the standards of the market. This is also true if they authorize such service and/or purchase.

At The Comex Group, those collaborators that are considered to be under a conflict of interest, be it real or potential (personal, social, financial or political), with customers, providers, shareholders or co-workers, must report it in writing to the Auditing Committee, who will take the appropriate measures. Hiding a conflict of interest may bring disciplinary measures as a consequence.

Employment of relatives

Relatives of present employees may be hired by the company only if (1) the individuals concerned will not work in a direct supervisory relationship with one another, and (2) the employment will not pose difficulties for supervision, security, safety, or morale. "Relatives" are defined as spouses, domestic partners, children, sisters, brothers, mothers, or fathers, and persons related by marriage. Present employees who marry or become domestic partners or who become related by marriage will be permitted to continue employment with the company only if they do not work in a direct supervisory relationship with one another, or otherwise pose difficulties for supervision, security, safety, or morale. If employees who marry or who become related by marriage do work in a direct supervisory relationship with one another, the company will attempt to reassign one of the employees to another position for which he or she is qualified, if such a position is available. If no such position is available, then one of the employees will be required to leave the company. The decision as to which employee leaves will be left solely to the employees. In the event that no alternative position is available and neither employee voluntarily leaves the company, the employee with lesser seniority will be terminated.



Handling of Confidential Information

It is compulsory to give confidential treatment to all the information of The Comex Group. We must commit to protect this information from disclosure to others.

We must understand as (confidential information) that which entails all types of exclusive, technical or business-related, non-public information, such as: records, reports, formulas, documents, machinery, processes, plans, methods and tools of the company and manual that might be used in such a way that they beneficially affect the interests of The Comex Group.

As collaborators we must observe and ensure that providers and suppliers abide by the following guidelines in their daily actions:

- Maintaining confidential information by using the appropriate security measures that avoid its disclosure and misuse
- The persons in charge of the different work areas in which administrative activities and/or operations are carried out must take preventive measures in order to protect the information from being viewed or taken by outsiders.
- Visits inside the work area from persons who do not belong there must be previously requested, scheduled and authorized by the person in charge of the area that will be visited. The visitors must be accompanied at all times by the person who requested the visit, making him/herself responsible for the activities that they carry out.
- Avoid leaving confidential information or documents accessible to third parties and talking about their existence to unauthorized persons
- Avoid distributing or providing any information about The Comex Group customers.
- Avoid disclosing any information pertaining to The Comex Group which others could use for their benefit.
- The usage of brands that are owned by The Comex Group or copyrighted trademarks or material (audio tracks, videos or recordings obtained through the Internet or the radio) is prohibited without authorization from Marketing and Legal.
- Usage of non-copyrighted material, including software, will only be permitted when the company has corresponding authorizations.
- Record the operations of the company under the best accounting practices and verify that they meet the guidelines described in the financial information norms.
- The access to this information is available for external and internal auditors under the formality and mechanisms which have been established by the corporate controller.

Handling of Information in the Media

Any request or information requirement from any member of the media must be referred directly to the corresponding managers: Communication and Editorial and Public Relations of The Comex Group. No employee is authorized to answer or provide information, or to speak in the name of The Comex Group and/or any of its affiliated companies or subsidiaries without previous explicit authorization of the Auditing Committee and of the aforementioned management.

Communication and Editorial Management

Fabiola Calapiz: fcalapiza@The Comex Group.com.mx

Public Relations Management

Eduardo Balcárcel: ebalcarcelq@The Comex Group.com.mx



Norms of Conduct with Customers

In relations with our customers we must, at all times, adhere to each and every one of the policies and procedures of the organization. Therefore, nobody associated with the The Comex Group or any subsidiary is permitted to:

- Favor one client over another
- Establish relations with customers, in detriment or against The Comex Group
- Using threatening means to enforce the fulfillment of a contract
- Deviating or allowing the misuse of the amount of your credit for your own benefit or for that of third parties
- Hiding some link or kinship with customers – acts which should be reported to the Auditing Committee
- Accepting and/or offering any gift or recreational activities that might compromise the actions of the person receiving it or that of the one giving it. If impossible to refuse the gift, it must be reported to the Auditing Committee, using as a basis the Denounce system described in this document. Gifts such as promotional or marketing items whose value does not exceed \$50.00 USD are excluded from this section.

Norms of Conduct with Customers

At The Comex Group, we work with those providers who share our ethical values and with those who have a reputation of having integrity and equality in their treatment.

It is our obligation to ensure that our providers know this code and verify that this is reflected in their relations with The Comex Group.

In our relations with our customers, nobody is permitted to:

- Give preferential treatment to providers who do not meet the characteristics of price and service required by The Comex Group, aiming to obtain long-term relations.
- Give an unequal and dishonest treatment in the purchase and payment operations of goods and services.
- Engage in plagiarism in any of its forms and variations (ideas, information, plans, projects and formulas, etc).
- Accepting and/or offering any present or recreational activities that might compromise the actions of the person receiving it or that of the one giving it.

Norms of Conduct with Competitors

A healthy competition helps us all to improve daily in order to have a more successful company. Competition is healthy because it forces us to improve. Ultimately, customers benefit the most from this competition for they may choose the best option presented to them. This is why, at The Comex Group, we must not act in ways that obstruct competition. This can be accomplished by observing the following guidelines:

- Being untruthful by manipulating the information of our competitors
- Obtaining information from other companies in an illegal way and using it for commercial purposes
- Being clear when the customers ask if a certain company is or not part of The Comex Group, or if an ex-worker is still an employee of The Comex Group; but never using that opportunity to disqualify the latter



Norms of Conduct with the Authorities

When performing our job at The Comex Group we must abide by the laws and regulations established by the various governmental authorities, as well as collaborating with them, defending the interests of the company at all times.

In case the authorities note, or that internal audits disclose that we are not observing any Federal, State or Local Law or Regulation, we must inform the Ethics Committee, the Legal, Fiscal and/or the corresponding internal areas so measures can be taken immediately and the situation can be corrected.

Description of Consequences

In the event any representative of The Comex Group or any subsidiary commits a negative action that can be considered as contrary to a healthy work relation by The Comex Group, this will be evaluated and will be subject to appropriate action, including, but not limited to disciplinary action by the Ethics Committee or other appropriate Committee or management personnel, always respecting the dignity of the persons and in accordance to our values.

System to Make Reports

At The Comex Group, we want everyone to observe and practice the values that will make us better individuals. That is why we invite you to report any action or conduct that you learn about and consider to be inappropriate. We assure you that your report of inappropriate action or conduct will not result in any form of retaliation and that we will take the necessary measures to deal with the matter appropriately.

The contact information you can use to make your report of inappropriate conduct include:

1. **Toll-free phone line:** 01 800 830 8745
2. **Website:** <https://www.tipsanonimos.com/eco>
3. **E-mail:** eco@tipsanonimos.com
4. **Postal Office Box:** CON-080 in Mexico D.F.
5. **Fax:** (55) 52 55 13 22

Ethics and Responsibilities Committee

The Ethics Committee will act in a fair way, without preferential treatment, reacting responsibly and according to the provided information.

Responsibilities of the Areas Related to the Ethics and Conduct Committee

Board of Directors

- Approving the Code of Ethics and Conduct
- Expanding and divulging it
- Keeping the Code of Ethics and Conduct updated

Advisors

- Knowing, observing and enforcing the Code of Ethics and Conduct
- Making suggestions for its improvement
- Annually signing the Compliance Letter

Auditing Committee

- Knowing, observing and enforcing the Code of Ethics and Conduct
- Ensuring all collaborators know the Code and annually endorse its compliance



Directors

- Knowing the Code of Ethics and Conduct and observing its dispositions
- Supporting the collaborators by clarifying their doubts and solving the difficulties that may arise for its understanding and fulfillment

Human Capital and Internal Communication

- Divulging the Code of Ethics and Conduct amongst the personnel, especially amongst the new hires
- Ensuring that all the collaborators know the Code and annually endorse its compliance
- Informing the Committee of any non-compliance they are aware of

Communication and Editorial Management and Public Relations

- Validating any question or information request from any mass media
- Ensuring that the messages included in the Code of Ethics and Conduct meet the orthography and wording standards required for the general comprehension of it by all the members of The Comex Group

Internal Audit

- Evaluating the observance of the dispositions contained in the Code of Ethics and Conduct
- Supporting the investigation of the denounces received or non-compliance situations they learn about or those that are reported

IN ANY GIVEN SITUATION, MANAGEMENT MAY DETERMINE THAT THE INVESTIGATION AND HANDLING OF REPORTS OF VIOLATIONS OF THIS CODE OF ETHICS AND SANCTIONS SHOULD PROPERLY BE HANDLED BY MANAGEMENT AT THE LOCAL LEVEL WHERE THE ALLEGED CONDUCT OR ACTION OCCURRED.

Validity

Our Code of Ethics and Conduct, once it has been approved by the Board of Directors, will be unquestionably valid. It is our responsibility and duty as members of the Board of Directors, shareholders, collaborators of all the companies of The Comex Group, providers and customers to sign in accordance with this Code. If any modification is made, this must be approved by the Board of Directors and the aforementioned must be notified, so we can sign again in accordance and acceptance of the Code.

General Policies

Equal Employment Opportunity Statement

Policy: The Comex Group recognizes and appreciates the rich array of talents and perspectives that cultural diversity can offer and is committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment. The Comex Group strives to prevent discrimination against any employee or applicant in any condition of employment because the individual's race, color, national origin, gender, religion, age, disability, sexual preference, gender variance, marital status, veteran status or participation in lawful off-duty activities. The Comex Group will comply with all applicable Federal, State and local laws

Accountability: The Comex Group management staff is responsible for enforcement of this policy within the company and its' external locations. The policy of equal employment opportunity applies to all terms, conditions, and privileges of employment, including hiring, testing, training and development, promotion, transfer, layoffs, social and recreational programs, and retirement.



The Comex Group is committed to making employment decisions based on valid requirements, without regard to race, color, national origin, gender, religion, age, disability, sexual preference, gender variation, marital status, veteran status. Specifically, The Comex Group will not prohibit employees from speaking their primary language or the language they speak most comfortably on the job except when it is justified by business necessity.

The Comex Group ensures all employees or applicants will not be discriminated against on the basis of their national origin. This policy has been adopted in accordance with Federal and State laws and ensures consistent treatment for all employees and applicants.

Procedures: If you believe there has been a violation of the EEO policy based on protected classes outlined above, please use the following complaint procedure. The Comex Group expects employees to make a timely complaint to enable the company to investigate and correct behavior that may be in violation of this policy.

Complaint Procedure: Employees must inform Human Resources of any EEO violations as Human Resources will investigate complaints. The Comex Group management prohibits retaliation against employees who, in good faith, bring forward a complaint.

1. Report violations in writing immediately to your manager, or
2. Access the HR Helpline at 855-722-6639

All complaints will be handled as confidential as possible. However, since the Employer has the responsibility to investigate complaints, strict confidentiality cannot be maintained during such an investigation.

Attendance and Punctuality Policy

Policy: Because of the nature of services provided by The Comex Group, it is essential that all employees report for duty on the days and times scheduled. Excessive absenteeism and tardiness disrupts productivity and makes it difficult to function effectively and meet customers' (both internal and external) needs. This policy outlines expectations for employee attendance and proper notification.

Definitions:

A. Scheduled Absence: Scheduled absences to be away from, or late to work are pre-planned by the employee, prior permission obtained from the manager and negotiated with the least impact to the department. Examples include: jury duty, medical or dental appointments, military duty, vacation and/or personal leave. Scheduled absences such as loss time from work covered by workers' compensation, and family or medical leave covered under FMLA are not counted in the employee's absentee rate.

B. Unscheduled Absences:

- A. Absences that occur without prior supervisory approval, but with proper notification to the supervisor, such as calling in sick. Leaving before the end of a scheduled shift, not being present at the work place during scheduled hours, arriving after your scheduled start time or returning late from a break may be considered an unscheduled absence or tardy.
- B. "No Show:" An unapproved absence in which the employee fails to report to work as expected without proper notification to the manager. The third consecutive day in which an employee fails to report to work without proper notification is considered a voluntary separation on the part of the employee.



- C. Tardiness: Reporting to work after the employee's scheduled starting time without prior approval from the manager.

Accountabilities:

Manager Responsibilities: The manager has an important role in monitoring and correcting issues regarding employees' attendance. Therefore, while a manager should expect good attendance, it is the responsibility of each manager to:

1. Communicate the attendance expectations and policies;
2. Monitor absenteeism rates for individual employees and for the department as a whole on a regular basis and immediately address problems
3. When an employee is, or expecting to be, absent three or more consecutive days, the manager must assess the situation for applicability of the FMLA or leave policies. Please contact HR for additional information, forms and guidelines regarding leave policies.

Employee Responsibilities: Good attendance is a condition of employment. Employees must take responsibility for monitoring his/her absences and adhere to The Comex Group policy.

1. All employees are required to give advanced notice as required by their manager for all absences, tardiness, or time away from the work place during scheduled hours in order for the manager to obtain sufficient coverage for the employee's position. Managers should establish notification guidelines to fit their specific department needs and communicate these to employees.
2. Employees must designate if an absence is a FMLA qualifying event. For additional information, please refer to the FMLA policy or call an HR representative;
3. In the event of an employee's absence due to illness or injury, the manager may require a release to return to work from the employee's treating physician. HR will require a release to return to work from the treating physician for an FMLA leave, before the employee can begin working.

Harassment Free Work Place Policy

Policy: The Comex Group employees are entitled to work in an environment that is free from harassment of any form. Acts of harassment disrupt the workplace and interfere with performance. An intimidating, offensive, or hostile work environment will not be tolerated.

At The Comex Group, all charges of harassment are taken seriously and will be thoroughly investigated. When possible you should report any incident of harassment to a human resources representative. Any employee who is found to have violated our policy against harassment will be subject to disciplinary action, up to and including termination.

It is the policy of The Comex Group to recognize and enforce the right of employees to work in an environment that is free of harassment. The company will not tolerate verbal or physical conduct by any individual, including employees, clients, and contractors, that harasses, disrupts, or interferes with an employee's work performance by creating an intimidating, offensive, or hostile work environment.

Definitions:

Harassment includes: Any unsolicited and unwelcome behavior, either verbal or physical, that causes the recipient discomfort or humiliation, or that interferes with the recipient's job performance; explicit, degrading comments, or discriminatory remarks, made by someone in the work place that are offensive or objectionable to the recipient.



Any incident in which a person with authority uses his or her position to control, influence, or affect the career, salary, or job of another employee or prospective employee in exchange for favors.

Any unwelcome advances, request for sexual favors, or other verbal or physical conduct of a sexual nature constitutes harassment when:

Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's continued employment;

Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual; or

Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment

Major Responsibility Assignments

Human Resources is responsible for directing the investigation of all complaints of any form of harassment and for advising the employee of the findings and conclusion of the investigation.

Managers are responsible for ensuring that this policy is strictly enforced and each work location is free from harassment or conduct that causes, or reasonably could be considered to cause, an intimidating or offensive working environment.

Employees are responsible for conducting themselves in ways that ensure others are able to work in an atmosphere free from harassment, and for reporting any incidents in which they have knowledge of behavior that could be construed as harassment.

Guidelines

Social interaction among employees is an essential element of the work environment that, in most cases, should contribute to high employee morale, performance, and productivity. Harassment is a form of misconduct that undermines this positive environment and the integrity of the employment relationship. No employee should be subject to unsolicited and unwelcome behavior or conduct, either verbal or physical.

All employees shall avoid any behavior toward any other employee, clients, or contractors that creates a hostile work environment or that could be interpreted as sexual harassment. Such conduct includes, but is not limited to:

- Sexual flirtations, touching, advances, or propositions
- Verbal abuse of a sexual nature
- Suggestive or graphic comments about an individual's dress or body
- Sexually degrading words to describe an individual
- The display in the work place of sexually suggestive objects or pictures

A close, personal relationship between a manager and a subordinate that is deemed to be disruptive to a productive work environment may result in the company separating the employees organizationally, possibly by transferring one or both persons involved.

Procedures: If an employee believes that he or she has been the victim of harassment, or has any knowledge of such behavior, should report such incidents immediately to human resources. Managers shall report all complaints of harassment to the human resources director immediately.

The human resources director or her designee will investigate all complaints of harassment promptly and in an impartial and confidential manner. In all cases, the employee will be advised of the findings and conclusion of the investigation.



Any employee who, after appropriate investigation, is found to have engaged in any form of harassment of another employee, client, or contractor will be subject to disciplinary action, up to and including termination.

Drug and Alcohol Free Workplace Policy

Policy: The Comex Group is committed to a safe, healthy, and productive work environment for all employees free from the effects of substances that impair employee judgment, resulting in increased safety risks, injuries, and faulty decision-making. The illegal or unauthorized manufacture, distribution, dispensation, possession, storage, or use of any drug or alcoholic substance by an employee at The Comex Group, while on the grounds or property of the company, or while serving as an agent of The Comex Group, will not be tolerated. Violation of this policy will result in disciplinary action, up to and including termination.

The Comex Group voluntarily complies with the Drug-Free Workplace Act. The law prohibits the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance during work time or on any work sites. Conviction under any criminal drug statute for a violation occurring on or off the job and/or failure to notify the company of any arrest or conviction under any criminal drug statute within five days of the arrest or conviction will constitute violation of this policy.

Definitions

Impaired Employee: Alterations in behavior, cognitive abilities, physical agility, and dexterity due to the ingestion of ethyl alcohol or drugs, including substances with known mind or functioning altering effects on the person.

Alcohol or Alcoholic Beverages: Alcohol means beer, wine and all forms of distilled liquor containing ethyl alcohol.

Controlled Substance/Drug: Any substance that has known mind or function-altering effects on a person, including psychoactive substances and including but not limited to, substances prohibited or controlled by state and federal laws. Drugs may include prescription or nonprescription, and legal or illegal substances.

Procedures: If a non-employee functioning in The Comex Group (e.g. visitor, temporary staff, or agency pool) is suspected to be under the influence of drugs or alcohol:

1. Remove individual from the immediate working area and escort the individual to the manager's office until decision is made regarding testing. The individual under suspicion must be escorted at all times until disposition is determined.
2. Document reasonable suspicion behaviors and responses of the individual. If the employee leaves against medical advice, Security and/or the police will be notified.
3. The manager will notify Human Resources when there is reason to believe that an employee is involved with illegal possession, diversion, manufacture, use, sale, or transfer of a controlled substance on The Comex Group property and/or during the employee's working hours. Diversion will not be tolerated.

An employee shall, when drugs are prescribed by a medical professional, inquire of the prescribing professional whether the drug prescribed has any side effects which may impair the employee's ability to safely perform the employee's job duties. If the answer from the medical professional is yes, the employee shall obtain a statement from the medical professional indicating any work restrictions and duration, presenting that statement to HR.



Reasonable Suspicion Testing

An employee will be asked to submit to tests for alcohol and/or illegal drugs when a manager determines that the employee is reasonably suspected of being impaired in the performance of his/her duties.

1. Reasonable suspicion testing may result from one of the following examples, but is not limited to the following:
 - Specific, personal and direct observations concerning the appearance, behavior, speech or performance of the employee; or
 - Violation of a safety rule, or other unsafe work incident which, after further investigation of the employee's behavior, leads the supervisor(s)/manager(s) to believe that the employee's functioning is impaired; or
 - Other physical, circumstantial, or contemporaneous indicators of impairment.
2. If any employee has a reasonable suspicion that a fellow employee, management staff or physician is under the influence of drugs or alcohol she/he will immediately report this to her/his manager or to the manager of the fellow-employee.

Testing During the Work Day

If there is reasonable suspicion that the employee is under the influence of drugs or alcohol the following actions will be taken:

- a. The manager will inform the employee of the fact that his/her behavior has given rise to reasonable suspicion that the employee is under the influence of alcohol or drugs. Once notification takes place, the manager will escort the employee to the assigned clinic to be tested.
- b. If the employee self discloses a substance abuse problem, the employee will be directed to resources for treatment, such as the employee assistance program.
- c. Refusal to consent to examination or to testing is considered a violation of this policy and may lead to disciplinary action up to and including termination.
- d. All employees subject to drug or alcohol testing will have the opportunity, prior to testing, to list all prescription and non-prescription drugs they have used in the last 30 days and to explain the circumstances surrounding the use of such drugs.
- e. While waiting for test results, the employee is placed on administrative leave.
- f. Employees who test positive for alcohol or drugs will be subject to disciplinary action up to and including termination.
- g. Employees who do not test positive for alcohol or drugs are given the opportunity to discuss the test results with the Medical Review Officer and/or HR prior to the results being released.
- h. The employee's manager/supervisor may also initiate other corrective or disciplinary action up to and including termination.

Smoking Policy

Policy: The Comex Group is committed to providing employees and customers to with a smoke-free environment. Smoking and the use of chewing tobacco are prohibited in all stores, offices, company vehicles and facilities of The Comex Group.

Employees make not smoke or use tobacco while working, except during meal and scheduled breaks in designated outdoor smoking areas which are 25 feet of any public entrance. Employees must abide by all applicable state and local laws regarding smoking.



Company Property Policy

Policy: The Comex Group provides our employees with all the equipment, tools and supplies needed to carry out their duties. All equipment, tools and supplies provided by The Comex Group or purchased with company funds are considered company property, and may be used only for legitimate business purposes. Company property may not be removed from company The Comex Group for any reason without permission. You must immediately return or surrender any company property in your possession if requested to do so.

Any abuse, theft, misappropriation, loss or intentional destruction or defacement of company property, including office equipment and office supplies, may result in disciplinary action, up to and including termination. You may be required to compensate the company for any lost or damaged equipment or supplies if permitted by state law.

Procedures: Each supervisor is responsible for ensuring that all of his or her employees are familiar with the procedures for ordering or replenishing office supplies, and for reporting damaged or malfunctioning equipment or tools. If you terminate employment with The Comex Group, you must immediately return any company property in your possession, including keys, access cards, and company-provided cell phones or computers.

Travel Policy

Policy: In all instances, employees are expected to exercise prudent business judgment regarding travel expenses. Managers are expected to use good business judgment in approving expense reports and addressing inappropriate expense reporting should the occasion arise. Travel should be a business necessity; teleconference, phone conferences and webinars should be your first choice.

In order to receive reimbursement of any business expense, each employee must submit an approved Expense Form outlining all expenses related to a specific trip. All expense reports must have original receipts and documents that support the expenditure (s) attached to the Expense Report. Employees submitting expenses that are not in compliance with policy, risk a delayed, partial, or forfeited payment and reimbursement of out-of-pocket expenses. Cases of significant or repeated abuse may result in disciplinary action, including employee termination.

Any expenses that are to be paid outside of this policy should be approved by the CFO. All employees who travel on company business, regardless of their employee status, are expected to comply with this policy.

Questions regarding this policy should be addressed to your Human Resources Manager, who will contact the Corporate Office if further clarification is needed. This policy will be updated as negotiated contracts and policies and procedures are changed.

Procedures: All business trips requiring an overnight stay, an airline flight, or car rental require the employee's manager's approval. Employees will send an email to their manager with a brief justification of the trip. The manager should respond back via email.

The approval email needs to be attached to the expense form when it is submitted to accounting for processing in order for the expenses to be reimbursed.



MAKING TRAVEL ARRANGEMENTS

Airline Travel

All employees will fly in economy class, and it is company policy that all employees seek and book the least expensive airfare. Seeking the lowest logical airfare will include consideration of:

1. Flights departing or arriving within a four hour “window” of our desired time of travel
2. Saturday night stays
3. Connections or direct flights
4. Alternate airports
5. Penalty fares, and
6. Advance purchase fares

You must use prudent judgment in determining whether the lowest fare offered is “logical” depending on the individual circumstances of travel. If, for example, using another airport will save \$75, but the increased cost of a taxi is \$80, then it would make sense not to accept the lower airfare.

The Comex Group receives reports of all travel booked. These reports highlight all reservations where lower fares were refused. It is the responsibility of the Program Administrator (T&E Department) to inquire and determine if the decline of a lower fare is justified.

When you charge your airline ticket on your Corporate American Express Card, you will automatically receive \$200,000 in business travel accident insurance. In addition, you will also be eligible for baggage insurance for up to \$1,750 in the event your luggage is lost by the airline. This coverage is secondary to the airlines. If you desire personal property insurance, such insurance can be purchased through American Express. However, such insurance will not be reimbursed by the Company. The Comex Group will not be responsible for replacing lost or stolen personal belongings.

Use of Preferred Carriers

The company currently has negotiated programs with several airline carriers which provide discounts and incentives for volume travel. You will be asked to fly on a preferred airline carrier provided that the fare is equal to or lower than fares quoted by other carriers, and the travel itinerary remains within reason.

Frequent Flyer Programs

Traveling employees are currently permitted to retain frequent flyer program benefits earned while traveling on company business. However, under no circumstances will you be permitted to select a carrier based on participation in these programs which costs the company additional money, or does not include the use of the preferred carrier(s) defined above when fares are equivalent.

Payment for Tickets

All tickets must be billed to your Corporate American Express Card. If you do not have a card, it must be billed to your supervisor’s American Express Card.

If a non-refundable ticket cannot be used for travel, you must notify the T&E Department immediately, and every effort should be made to re-use the ticket for the original traveler under the conditions provided by the airlines for re-issue of penalty tickets.



Risk Management

Careful consideration should be given when booking groups of employees traveling on the same plane. No more than four managers or corporate officers should travel on the same plane unless given prior approval by their senior manager.

Combining Business with Personal Travel

If personal travel is combined with business travel that results in a higher fare, the agency will quote the fare with the extra cost involved for the personal portion as a separate amount. Payment for the difference should be made directly to American Express and you are to advise The Comex Group T&E team of the situation.

Lodging

A. Negotiated rates

The Comex Group Inc. expects its employees to obtain safe and comfortable accommodations. For that purpose, the company has negotiated special rates in selected cities where we conduct business on an on-going basis. You should use these hotels as your first choice whenever possible unless lower cost hotels can be located through other means. Lodging must not exceed \$100 per night (excluding taxes) unless there are safety concerns with hotels in that price range or when there are rare exceptions due to market costs. Booking a hotel greater than \$100 per night will require email approval from the employee's manager. This approval needs to be attached to the expense report when it is submitted for reimbursement. Unapproved charges in excess of \$100 per night will not be reimbursed and the employee will be responsible for the difference.

B. Client negotiated rates

If you are traveling with a Comex Group client and/or vendor and can utilize their negotiated hotel rate that is lower than The Comex Group and/or Amex negotiated rate, please share that information with The Comex Group Program Administrator, and document on your expense report accordingly.

C. Hotel and room type

When you are not able to use The Comex Group negotiated hotels, you should request hotel selection in the "moderate, full-service" range. We will not ask employees to stay in hotels that are not clean, safe or do not provide necessary amenities, but the use of luxury or high-rate hotels will not be approved without extenuating circumstances and prior approval by the Chief Financial Officer.

Employees will not be asked to share a single room. However, some exceptions may apply in large group events. Example: sales meeting. If breakfast is included in the price of the hotel room, then breakfast expense will not be reimbursed unless special circumstances exist.

Extra costs for upgrades, pay per-view movies, telephone calls from the hotel, gym passes, and "concierge" level rooms will not be reimbursed by the company. Any exceptions to this policy must be authorized by the CFO.

D. Canceling reservations

In most cases, your hotel reservations will be made for "guaranteed late arrival," which means you must cancel or change your reservations by the cancellation deadline listed on your travel itinerary in order to avoid being charged for the room. The company will not pay for "no-show billings" if you do not cancel your reservation and obtain a cancellation number.



Ground Transportation and Car Rentals

A. Mileage Reimbursement

If you use a personal vehicle on approved company business and do not receive a car allowance, you will be reimbursed for actual business mileage at the business rate currently allowed by the IRS.

If you are driving on company business directly to or from home, you should report only the difference between the mileage from home to the office and the actual mileage to the location (i.e., if you live 12 miles from the office and drive 18 miles to report to work at client location, you should only report 6 miles as business miles for reimbursement). Mileage should be entered as "Total Miles less Normal Commute Equals Reimbursable Miles." If business travel is less than employee's normal commute, then no miles are reimbursable. All reimbursable miles must list nature of business.

B. Driving versus Flying

Employees who voluntarily choose to drive their own vehicle instead of flying must receive advance approval from their senior management to do so. The maximum mileage reimbursement allowance will be no greater than the cost of coach airfare, parking fees, car rental, and tolls to the designated location.

C. Car Rentals

Use of Preferred Vendor

The company currently has a negotiated rate with Enterprise/National and you will be required to use either one of these providers for your car rental needs. Exceptions to this policy must be approved in advance by senior management.

1.) Visit www.enterprise.com

- Type in the account number (**XZ12081**) at the bottom of the first page.
- Type in the first three letters (**your Pin**) of the account name (**THE**) on the next page.
- Book a reservation for any Enterprise location in the country.

2.) 1.800.593.0505 = Corporate VIP Line

3.) Call any rental branch directly and simply reference Account #: XZ12081 to receive your special rates.

Car Class Restrictions

You will be authorized to rent up to a mid-size vehicle for normal business travel. Advance approval must be received from your manager should the situation require another type of vehicle (larger groups, travel to remote locations with difficult terrain, etc.) The company will not pay for extra costs incurred by upgrading or renting premium or luxury vehicles.

Insurance

Employees are considered to be on company business whenever driving a rental car paid for by the company. Since you are covered by our regular company liability insurance while renting a car on authorized company business, you should always decline purchasing additional insurance from the car rental agency. If you are involved in an accident or damage a vehicle, you should report it both to the agency and to our company. **You must have The Comex Group / Lockton Accident Reporting Kit with you when you rent a car. Should you be involved in an accident, follow the instructions in the kit.**



Payment

Employees who have been issued a Corporate Card should make payment with that card and submit the receipt to The Comex Group Inc. T&E group with your expense report.

One-time direct billing of car rentals can be requested through their Department Manager for full-time employees who do not have a Corporate Card.

Refueling

Refuel the rental car before returning it to the agency, since the refueling fees are at least twice as expensive at the rental agency.

Rail

Travel by rail should only be considered when it is a more efficient method of traveling than by air and must be approved in advance by senior management. Class of service will only be approved at the comparable levels of air travel for "lowest logical fares."

Local Ground Transportation

It will often be more economical to utilize local transportation instead of car rentals, such as:

1. Hotel shuttles to and from the airport;
2. Taxi services (Attempt to share taxi rides with other employees and utilize taxi services that accept the American Express Corporate Card as a form of payment whenever possible.)

The company does not expect employees to take unnecessary safety risks when traveling; however, you are expected to seek and use the most economical method of local transportation that is practical and feasible.

Parking

You are expected to utilize reduced rate parking at airports. Reasonable parking and toll fees will be paid while you are traveling. You should use good judgment in selecting the most economical method of parking possible, without exposing yourself to unnecessary safety risks.

Meals, entertainment, and incidental expenses

All salaried personnel will be reimbursed for business travel meals and incidentals on the basis of itemized receipts submitted to The Comex Group Inc. T&E team. The maximum daily expense allowed for meals while traveling is \$40.00 excluding tips. Tips are to be limited to 15%.

Detailed original receipts must be submitted along with the credit card receipt in order for The Comex Group Accounting to make payment to the employee for all meals and entertainment expenses charged to the Corporate Card. Exceptions to this policy must have advance approval from their immediate manager, with a justification for the exception.

You should use your Corporate Card (as opposed to cash) to pay for meals.

Entertainment

Any entertainment expenses should be limited to managers and sales staff. Employees outside these positions must have advance approval from their manager to submit entertainment expenses.

No employee will be reimbursed for purchasing a meal for another employee unless one or both are traveling. Exceptions will be made during physical inventories when meals may be provided to employees during inventory assignments. Rare full-day department meetings may be reimbursed with prior written approval by the department VP.



Documentation for Entertainment Expenses

Outside sales associates have a monthly limit for all meal and entertainment costs. The limit for RSVPs, AVPs and Sales Managers is \$200 per month. The limit for Sales Reps is \$100 per month. Charges should be made to the corporate credit card and receipts are required per Section E: Meals, entertainment, and incidental expenses.

In addition, the following information must also be documented on the expense report in the Purpose of Trip Column. See also Policy 6.12 Sales Entertainment Expenses.

1. Name, title, and company of all attendees;
2. Name and location of establishment;
3. Amount and date of expense; and
4. Specific business topic discussed.

Other Incidental Expenses

All employees should submit legitimate, itemized receipts for other incidental business expenses incurred as a result of traveling on company business. Receipts will be required for all expenses.

Legitimate business expenses include:

1. Airfare, including baggage checking fees if charged (not including excess baggage fees)
2. Hotel room and tax charges
3. Ground transportation
4. Business-related tips
5. Parking and toll fees
6. Clothes cleaning expenses (within policy outlined below)

Expenses that will not be reimbursed by the company include:

1. Personal sundries or toiletries (i.e., newspapers, tobacco, shoe shines, toothpaste, etc.)
2. Movies or other personal entertainment (including in-room and airline movies)
3. Airline club memberships, Red Carpet and other travel memberships
4. Fees for frequent flyer program benefits
5. Traffic violations
6. Excess baggage fees
7. Baby-sitting or pet care fees
8. Hairstyling or other personal service fees
9. Lost luggage or other lost personal items
10. Airline or travel insurance (other than that provided by our travel agency)
11. Unauthorized gifts, meals, or outside functions attended by corporate personnel

Cleaning

Employees will be reimbursed for the portion of laundry and dry cleaning expenses incurred while traveling on extended trips which is intended to cover the additional cost of cleaning services while traveling, as opposed to costs incurred at home.

In order to qualify for cleaning allowance, all employees must provide itemized receipts and be out-of-town at least five (5) consecutive days.

Payment and reimbursement procedures

The company uses the Corporate Card provided by American Express as its principal payment system for airline, hotel, car rentals, meals, entertainment, and miscellaneous travel and entertainment expenses, whenever possible. Corporate Cards are intended for business reasons, and personal expenses are not to be made on the American Express Corporate Card for any reason.



If you are a regular traveling employee, application will be made for you to be issued a Corporate American Express Card. The control and responsibility for issuance and termination of all company Corporate Cards remains with the T&E Program Administrator.

You are responsible for submitting your expense reports within seven (7) business days of incurring the business expense. The Corporate Card is intended for travel and entertainment expenses and should not be used for membership dues or other non-business related expenses.

Travel Advances

The Comex Group Inc. will issue temporary cash travel advances for employees that do not have access to a card. Requests for a travel advance must be made in writing to their manager at least two weeks prior to travel.

You will be held accountable for this money, and you must submit a properly documented expense report to clear the advance after each trip or by the 25th of the month, whichever comes first. Failure to do so will result in withholding of any future advances. Prolonged delays in clearing travel advances will result in disciplinary action. If you leave employment of the company for any reason, you are still personally responsible for clearing any outstanding travel advances with an approved expense report.

Employees who travel with a Corporate Card are encouraged to put as many of their expenses as possible on the Corporate Card.

Expense Report Procedures

You must use the company issued expense report form to account for your expenses. It must be submitted for approval to your manager within 7 working days after you return from a trip. Expense reports must be completely itemized and supported by actual receipts. The client number or general ledger number the charges should be applied against must be indicated on the expense report form. Acceptable receipts will include:

Airline:	Original airline ticket stub, invoice, or e-ticket
Car Rental:	Original receipt from car agency (express billing receipt is acceptable) with Corporate Card receipt
Hotel:	Original hotel bill with Corporate Card receipt
Meals:	Hotel bill/folio, Corporate Card receipt and cash register receipt from the restaurant unless the Corporate Card is not accepted; then Cash register receipt only
Entertainment:	Same as meals
Other:	Original receipts or Corporate Card receipts

Approval

All expense reports must be submitted and approved by your supervisor before being submitted to The Comex Group T&E group for payment/reimbursement.

Supervisors approving expenses are responsible for seeing that the expenses covered by the report being signed are reasonable and necessary business expenses. The signer is also expected to see that appropriate bills and receipts are attached and that unusual items are explained.



A second review will be performed by the T&E group to validate the following:

- Proper approval
- Nature and reasonableness of expenses
- Clerical accuracy
- Attachment of necessary receipts
- Compliance with the Travel policy

International Travel

If you travel to a foreign country, you will normally have a combination of U.S. dollars and foreign currency expenses. Upon arrival in a country, you should convert your currency at a local bank, which usually provides the best exchange rate. Airports and railroad stations usually have a local bank branch or casa de cambio. Avoid exchanging currency at your hotel, where exchange rates are usually much lower. You must keep your currency exchange rate receipt and submit it with your expense report.

When submitting your expense report, separate the expenses you paid in U.S. dollars from those you paid in a foreign currency. For those expenses you paid in cash, you should use the currency exchange rate you paid to convert your expenses. For Corporate Card charges, American Express will convert your charges to U.S. dollars when you are billed, so you should check with The Comex Group for payment/reimbursement.

You may submit expenses for costs incurred that are necessary for international travel on company business, such as passport fees, visas, immunizations, etc.; however, these fees must be approved in advance by your supervisor.

Your manager or The Comex Group Accounting representative can help you with proper procedures for completing and submitting expense reports if you require assistance.

Business and Personal Phone Use Policy

Policy: The Comex Group provides company telephones for business use. Use of personal cell phones must not disrupt business operation or impact customer service.

Procedures: The Comex Group requests that employees limit the use of company telephones for personal calls while at work, except during meal breaks, rest breaks or in the event of an emergency. Personal cell phones should not be used in work areas as this can disrupt the work of co-workers. Personal calls may not be made or received in the presence of customers, or in any location where it may be disruptive to the normal course of business. Cell phones may not be used in work areas of warehouses or plants due to safety issues. Repeated violation of this policy may result in disciplinary action.

Non-Solicitation of Coworkers Policy

Policy: The Comex Group does not permit any unauthorized solicitation of our customers or employees on company premises. The Comex Group defines solicitation as any attempt to demand, urge or request another person to contribute money, time, effort or support for any purpose not directly connected with our business. Solicitation may include verbal appeals, posting or distribution of written materials, including posters, petitions or literature of any kind.



Types of solicitation may include, but are not limited to:

- Requests for political or charitable contributions
- Political campaigning
- Recruitment for political, religious, civic or social organizations
- Offers or sales of commercial services or products other than those offered by The Comex Group.

Procedures: You may not engage in any form of solicitation during your work hours, except with the prior authorization of The Comex Group. Employees may only solicit in non-working areas and during non-working hours, such as meal or rest breaks.

During your normal work hours, you may not wear any item of clothing (such as hats or T-shirts) or any button, emblem, tag, insignia or symbol of any kind that could reasonably be construed as endorsing any political candidate or issue, or any commercial or other organization. This rule shall not be construed to limit our employees' legitimate religious expression. With the prior approval of your supervisor, you are permitted to solicit other employees for contributions for gifts, parties or donations for a fellow employee, such as birthday or going-away parties, or donations in the case of hardship.

The Comex Group shall respect and shall not infringe upon our employees' rights to conduct lawful union activity, provided that such activity does not violate the guidelines established by the National Labor Relations Act and other applicable federal, state and local laws.

Solicitation by Non-Employees

Non-employees are strictly forbidden from soliciting or distributing literature to employees or customers of The Comex Group on company property at any time. Exceptions for charitable solicitation from a limited number of organizations preapproved and designated by the Company may be permissible.

Posting on Bulletin Boards

Company bulletin boards are considered the property of The Comex Group. Only work-related items may be posted at any time. Employees may not post personal items or information at any time for any reason.

Computer and Internet Usage Policy

Policy: Certain employees of The Comex Group are provided with computers and access to the Internet and company e-mail systems for business use. Your supervisor and the Information Technology (IT) department must approve access to these systems. Using company computer or e-mail systems without authorization, or allowing any unauthorized person access to company computers or systems, is strictly prohibited.

All computer hardware and software provided by The Comex Group are considered company property, as are any messages sent or received using the company e-mail system. The Comex Group reserves the right to monitor all usage of company hardware, software, e-mail systems or Internet access at any time, with or without notice. This may include the retrieval and examination of any e-mail messages sent or received using company e-mail addresses and the monitoring of Internet sites visited.

Any violation of this policy, including the unauthorized use, removal, or copying of any company-owned computer equipment, software or e-mail, will be subject to disciplinary action, up to and including termination.



Procedures:

Use of Software

You may not download, install or modify any software or executable files on any company computer or device without prior authorization from your supervisor and the IT department. Copying company-provided software for personal use is strictly prohibited, and may be grounds for disciplinary action, up to and including termination.

Use of E-Mail

All messages or communications sent using company e-mail systems or e-mail addresses must be written in a responsible, professional manner. The Comex Group e-mail should not be used to send jokes, frivolous or non-business-related messages through company e-mail systems.

The use of company e-mail systems or addresses to send harassing, threatening or sexually explicit or suggestive content (including e-mail attachments and Internet links) of any kind is strictly prohibited, and will be subject to disciplinary action, up to and including termination. Company-related e-mail messages should only be sent using company e-mail systems and e-mail addresses. You should avoid using personal e-mail addresses or accounts for company business.

For legal and business reasons, the company maintains backup files and logs of all e-mail messages sent or received through company e-mail systems or addresses. Messages sent through our e-mail systems are not private, and may be reviewed at any time to retrieve business information, to comply with subpoenas or other legal requirements, to address technical or network problems or for any other reason.

Employees should be aware that e-mail communications are not secure, and may be vulnerable to interception by persons outside the company. You should avoid sending sensitive personal information, such as Social Security numbers or credit card numbers, or any confidential or proprietary company information via e-mail. If you have questions about whether it is appropriate to send certain information via e-mail, you should contact the IT department.

Use of Internet Access

Employees should use company-provided Internet access only for business related purposes. Use of Internet access for personal, non-work-related browsing is not specifically prohibited, but such use is permitted only during meal or rest breaks, and only so long as it does not disrupt your work or the work of others.

You may not download files or software of any kind from the Internet except as required for legitimate business purposes, and only with the prior authorization of the IT department. Any files or software downloaded must be scanned for viruses and subjected to any other security procedures the IT department deems appropriate.

Employees should be aware that the company may monitor Internet usage, including reviewing an employee's browser history of sites visited, at any time, with or without notice. Any information accessed or viewed through company systems may also be subject to monitoring or logging. Under no circumstances may company computers or Internet access be used to access, view, download, upload or otherwise transmit pornography or sexually explicit material of any kind.



Use of Instant Messaging

Unless specifically authorized by their supervisor and the IT department, employees may not install or use instant messaging programs such as AOL Instant Messenger, Yahoo! Messenger, Skype, MSN Messenger or other products on company computer systems.

The company reserves the right to block access to certain websites, or to rescind an employee's access to the Internet at any time if we determine that Internet usage is disruptive to productivity or is in violation of company policy.

Inclement Weather/Company Closures Policy

Policy: Our employees' safety and well-being are of the utmost concern. The Comex Group will provide employees with information and guidelines on the closure of our stores and offices and the treatment of employee absences from work during periods of inclement weather and other emergencies. Employees will be notified by email of any authorized changes to normal work hours. If such conditions develop during the night and warrant delayed opening or official closing, official announcements will be made via email.

Procedures for Non-Exempt Employees

1. If you report to work with a late start or your location closes early, you will be paid as follows:
 - Worked less than half your shift- you will be paid for half your shift
 - Worked greater than half of your shift-you will be paid for all hours worked.
2. If possible, employees will be given the opportunity to make up the lost hours with their manager's approval. Lost hours must be made up within the same work week of the early closure. The Company cannot guarantee your location will be open to make up the hours missed. You may elect to use accrued but unused PTO.
3. If an inclement weather day is not officially declared, employees who do not report to work will not be paid unless they used accrued vacation or personal time, with their manager's approval. It is your responsibility to notify your manager of your circumstance or situation.

Procedures for Exempt Employees

You will be paid for the full day in accordance with applicable Federal, state and local law.

Personal Appearance and Attire Policy

All employees of The Comex Group are expected to maintain an appropriate standard of grooming and personal hygiene during working hours. This includes:

- Clean, well-groomed, and appropriate personal hygiene including, neatly trimmed sideburns and/or facial hair for men
- Avoiding excessive perfume or cologne
- Limiting make-up and jewelry to that which is tasteful and professionally appropriate and will not interfere with safety.
- Removing or covering (to the extent possible) any visible tattoos or body piercings (other than earlobe earrings), or other body art. The Comex Group reserves the right to set rules for appropriate employee hairstyles.

In no event shall The Comex Group unreasonably restrict any employee's legitimate religious expression.



Attire Standards for Laboratory Technicians and Warehouse/Delivery Personnel

Certain technicians, laboratory workers, warehouse personnel and delivery employees (including drivers) are required to wear approved uniforms while working. You must wear appropriate footwear. Appropriate footwear should be comfortable and safe and must be:

- Closed/covered shoes or boots (sandals and open-toed shoes are prohibited)
- Substantial enough to protect against injury; steel-toed work shoes or work boots are strongly recommended
- Rubber-soled, with non-scuff soles.

You must wear your company name tag while working.

Attire Standards for Retail and Sales Personnel

Retail employees may be required to wear uniforms or specific slacks and shirt styles and/or colors as determined by your Regional Vice President.

In all cases, jeans or denim pants, cargo pants, sweatpants or tights and T-shirts are prohibited. Your Regional VP will determine if shorts and/or skirts are permitted based on climate and safety considerations.

You must wear closed-toe shoes while working. Sandals and open-toed shoes are not permitted. You may be required to wear shoes of a specific color, such as black or brown. Exceptions to the requirements will require prior authorization from the VP of Stores.

You must wear your company name tag while working.

You may not carry or wear personal pagers, cell phones or other cellular devices while working, except with the prior authorization of your supervisor.

Attire Standards for Corporate and Administrative Personnel

Corporate and administrative or office support personnel are expected to maintain appropriate "business casual" attire while at work. In all cases, appropriate business casual attire should be:

- Clean and neatly pressed
- Not excessively tight, baggy or revealing.

Certain forms of attire are permitted only as specifically allowed by departmental policy or on designated "casual days." These include, but are not limited to:

- Jeans or denim trousers
- Sneakers, or tennis or athletic shoes.

Certain forms of attire are not acceptable at any time, including, but not limited to:

- Any soiled, torn, tattered or severely wrinkled article of clothing or footwear
- T-shirts, sweatshirts, sweatpants or other work-out apparel
- Tank tops, muscle shirts or spaghetti strap tops or shirts
- Any low-cut, bare-midriff or backless top
- Sundresses or cocktail attire
- Shorts or "skorts" (shorts with skirt front)
- Skirts or dresses shorter than mid-thigh length, or slit skirts
- Slippers
- Flip-flops
- Any type of hat or headwear, except where part of a specific, company event or promotion, or as part of the employee's legitimate religious or cultural expression.



Workplace Violence Policy

The Comex Group is committed in providing a safe and secure environment for its employees and visitors. Employees must interact with others in a respectful, professional and courteous manner at all times. The expectation applies both on and off The Comex Group's premises.

Policy: The Comex Group employees are to follow these procedures in case of any potential violence that may occur in the workplace or in any outside related events. All employees must attempt every possible option to prevent any violence in the workplace.

Employees who engage in violent conduct may be subject to disciplinary action, up to and including termination of their employment.

Examples of prohibited conduct include:

1. Intimidation – Conduct that causes a person to reasonably fear for his/her safety or the safety of others. Employees must never possess concealed or unconcealed weapons on The Comex Group premises.
2. Threats of Violence- Conduct that threatens harm to others or damage to property.
3. Violent Acts – Conduct that harms others or damages property.

Procedures: If employees receive information or observe any action that may lead to violence or has knowledge of a violent circumstance, these procedures should be followed:

- If any store personnel or other person(s) threatens to become violent or has knowledge of a violent circumstance, follow these procedures:
 - o Call 911 as soon as possible
 - o Try to control your emotions and remain calm
 - o Talk to the person calmly; try to find out what is wrong
 - o Follow instructions; if they should give any
 - o Ignore sarcastic or personal attacks
- If the person(s) become violent:
 - o Call 911 as soon as possible
 - o Write down everything you can about the attacker
 - o DO NOT touch anything at the scene, do not reset furniture/fixtures, clean up spills or handle anything
- Personnel should document and report any violence or physical, actual behavior or statements
 - o Where the threat or violence occurred
 - o When the threat or violence occurred
 - o Apparent causes for the threat or violence
 - o Any witnesses to the threat or violence

All personnel must immediately report all instances of workplace violence to their manager, their Regional Human Resources Director and the Regional Asset Protection Manager immediately



Employment Practices

Personnel Records Policy

Personnel records are maintained on employees as required by current employment laws. They are treated in a confidential manner. The information in an employee's record is permanent and must be kept up-to-date. You should immediately inform the Human Resource Department in writing of any change in your status, i.e. name, address, phone number, marital status, etc. No information contained in the personnel files will be given to anyone outside of The Comex Group unless employee permission is granted in writing, access is required by benefit, government, or legal processes, or information is given in response to a standard employment verification.

Internal Job Postings, Promotions and Transfers Policy

Policy: The Comex Group is committed to providing employees with the opportunity to be aware of and to apply for job openings within the Company. At the same time, the Company wishes to ensure employees spend adequate time in their current positions in order to successfully be able to learn and perform in the position before moving onto another role.

Procedures

1. Positions will be posted internally for at least 5 business days* as follows:
 - On the Company intranet
 - For select positions, via email, with a request to managers to post in departments or locations where employees do not have access to email
2. *Exceptions may apply and include but are not limited to director level positions, department reorganizations and promotions within the same job title.
3. Positions may be posted internally and externally simultaneously.
4. Candidate applications, both internal and external, must be submitted through the online application process in order to be considered for an open position.
5. The best qualified candidate will be offered the position. Internal candidate applications will be reviewed under the same criteria as external candidates. The top candidates who meet the required qualifications will be interviewed. All internal candidates will be considered and contacted, but not all internal candidates will be interviewed. All internal applicants must notify his/her current manager of their application prior to any scheduled interviews for the position to which they are being considered.
6. Transfers and promotions can only be processed and become effective at the start of a pay period.
7. Nothing in this Policy or elsewhere in this Manual shall be construed as a promise or guarantee of promotion, advancement or continued employment to any current employee.



Eligibility for Internal Candidates Policy

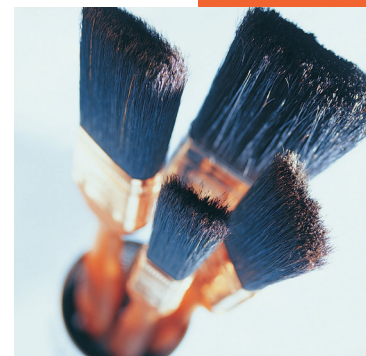
1. Employees under a current corrective or disciplinary review or under a final warning for performance or attendance are not eligible to post for other position until the expectations of the corrective action are met or until after 6 months of satisfactory performance following the date of issue of the final warning.
2. All Employees must be in their position six (6) months* before they are eligible to post for other positions.
3. *On rare occasions, an exception to the internal application eligibility requirements above may be made. Only exceptions with a valid business need will be considered. Additionally, written approval (email is acceptable) must be obtained from the employee's current manager and from the Vice Presidents of both the employee's current area or division and the area or division of the new position.

Benefits & Compensation

Benefits are an integral part of the overall compensation package provided by The Comex Group. The objective of the employee benefit programs is to provide you and your eligible dependents with comprehensive coverage and protection through choices that meet your individual needs. You are considered benefits eligible if you are classified as full-time and have agreed hours of 30 or more per week. Part time employees will be eligible for some benefit programs such as participation in the 401(k), holiday, and sick leave accrual. This excludes temporary and seasonal workers. You must satisfy the new hire eligibility period designated in the Employee Benefit Overview guide and summary plan descriptions. The Employee Benefit Overview guide is available on Conexión, the Intranet . If you decline to enroll in the benefit programs during the new hire waiting period you may have the opportunity to elect certain benefits during the open enrollment period designated by The Comex Group or if you experience a qualifying event such as marriage, birth, part time to full time.

The Comex Group's Full Time Benefits Package

- Medical/Prescription Drug
- Wellness
- Dental
- Vision
- Flexible Spending Accounts - Medical and Dependent Daycare
- Basic Life and Accidental Death (AD&D)
- Supplemental Life Insurance
- Short & Long Term Disability
- Supplemental Voluntary Plans through Unum such as Critical Illness, Accident
- 401 (k)
- Pension



Employee Discount Programs

The Comex Group will provide discounts through various vendor relationships. The discounts available to employees can be found on the Conexion intranet under the benefits information. You can also call the Human Resources Helpline at 855-722-6639 for more information.

- Discounted retail prices on Comex paint and paint products ranging from 10-30%. You may shop at any of the Comex brand retail stores nearest you such as Kwal, Frazee, Colorwheel, and Parker. Present the employee discount card provided to you upon your date of hire along with your ID to receive the discount. To order a new card you may contact the HR Helpline 855-722-6639.
- Discounted wireless phone services through The Comex Group's designated provider.

Family Medical Leave of Absence (FMLA) & CFRA Policy

Policy: FMLA Leave means is a leave that qualifies under the Family and Medical Leave Act of 1993. An Eligible Employee means an individual who has been employed by The Comex Group for at least 12 months, has worked at least 1,250 hours during the 12-month period immediately preceding the commencement of the requested leave, and is employed at a worksite with at least 50 employees within 75 miles of that worksite.

Length of Family Medical Leave of Absence:

1. Each full time employee may be granted up to a maximum of 12 weeks for FMLA during any rolling 12-month period. The employee's allowable leave is measured as 12 weeks or 84 days minus any FMLA leave has previously been taken in the prior 12 months.
2. Eligible part-time employees are granted a pro-rated amount of FMLA based on the number of worked hours in the prior 12 months.
3. For birth/adoption/foster care situations, the employee's entitlement to FMLA must be taken in a single block of time within 12 months following the qualifying event.
4. Married employees, both working at The Comex Group, may take a total of 12 work weeks (both employees combined) for care of a child following a birth, adoption or foster care and/or the care of each employee's own parent. Married employees may each take 12 work weeks for the care of a seriously ill child, spouse or parent.
5. The Comex Group may require the employee to periodically report on the medical status of the family member and/or intent to return to work.

Reasons for FMLA Leave:

An Eligible Employee is entitled to a total of 12-weeks of unpaid leave during each Leave Year in the event of one or more of the following:

1. The birth, adoption or placement for foster care of a son or daughter of the employee and to care for such child. (Leave must be taken during the 12-month period following the birth or placement, and must be taken in a single consecutive period).
2. A serious health condition of a qualifying family member, i.e. spouse, son, daughter or parent of the employee, if the employee is needed to care for such family member. A child is defined as a biological, adopted or foster child, stepchild, legal ward, or a child of a person standing in loco parentis, who is under 18 years of age or 18 years of age or older and incapable of self-care because of a mental or physical disability.



3. A serious health condition of the employee that makes the employee unable to perform any one or more of the essential functions of his or her job.
4. Any “qualifying exigency” arising out of the fact that an employee’s spouse, parent, son or daughter is on active duty or has been called to active duty in the Armed Forces in support of a contingency operation.
5. An eligible employee is entitled to a total of 26-weeks of unpaid leave during a single 12-month period to care for a parent, son, daughter, spouse or next of kin who is a Covered Service Member, regardless of whether the employee has taken leave for another FMLA qualifying reason in the past 12-months.
6. Any leave taken under one or more of these circumstances will be counted against the employee’s total entitlement to FMLA leave for that Leave Year.

Accountability

Employee Responsibilities

1. Complete the Notification of Leave providing a 30 day advance notice of the need to take FMLA, if the leave is foreseeable. Fax the notification form to the HR Benefits Department at 303-307-2183. The notification begins the leave process.
2. Submit the medical certification form to your medical provider to fill out and sign. The completed medical certification must be faxed within 15 days to the HR Benefits department in order to be approved.
3. Consult with your department manager prior to the scheduling of FMLA leave and/or medical treatment in order to mutually meet the needs of both the employer and the employee.

Manager Responsibilities

FMLA paperwork is given to an employee and the HR Benefits department is notified for the following reasons:

1. A period of incapacity of more than three (3) consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition, that also involves:
2. Treatment by a health care provider on at least one occasion, which results in a regimen of continuing treatment under the supervision of a health care provider;
3. A period of incapacity due to pregnancy or prenatal care;
4. A period of incapacity or treatment for such incapacity due to a chronic serious health condition;
5. Any period of absence to receive multiple treatments by a healthcare provider.

Human Resources Benefits Department Responsibilities

1. Review employee’s claim to ensure qualification under the Family and Medical Leave Act (FMLA).
2. Notify in writing the employee of eligibility, entitlements and obligations under The Comex Group FMLA policy within the legally required timeframes.
3. Assist managers in complying with the Family and Medical Leave Act and using the proper use of accruals for the FMLA absences.



Salary/Benefit Continuation

- a. Employees on Family Medical Leave of Absence are required to use accrued personal sick leave and vacation leave until exhausted. California can choose not to use vacation. FMLA is without pay when accruals are exhausted.
- b. An employee on an unpaid FMLA will be retained on The Comex Group benefit plans. The employee is responsible for payment of the employee's portion of the benefit deductions each pay period. Premium payments for health insurance that are usually made with pre-tax dollars will have to be made by the employee with after-tax dollars during the leave.
- c. In the event that an employee fails to pay for the benefit premium deductions, their benefits will be cancelled and COBRA will be offered.
- d. An employee on an approved FMLA leave may be eligible for Short Term Disability (STD), except California.

Returning From Leave

- e. An employee returning from leave shall be reinstated to the same or an equivalent position upon the employee's return to work (i.e., pay, benefits, and other employment terms).
- f. FMLA will not result in the loss of seniority or level of benefits in effect prior to the date on which the leave commenced.
- g. Medical certification is required verifying an employee's ability to return to work from FMLA (fitness for duty) before the employee is allowed to report to work. The HR Benefits Department will evaluate the medical certification and determine if the employee is able to return to work.
- h. Failure to return to work on the day after the expiration of Family Medical Leave of Absence (or the maximum length of approved leave) may result in termination of employment.
- i.

California Pregnancy Disability Leave (PDL) Policy

Policy: If you are disabled due to pregnancy, childbirth, or related medical condition, you may take up to a maximum of four months leave. Leave taken under the Pregnancy Disability policy runs concurrently with the FMLA (family medical leave) under federal law, but not with CFRA leave under California law.

Procedures

1. If you need to take a pregnancy disability leave, you must provide The Comex Group with reasonable advance notice. In addition, you must provide The Comex Group with a health-care provider's statement certifying when the last day you can work and the expected day of your return.
2. Pregnancy disability leaves are without pay. Employees are required to take use accrued sick leave and have the choice of using vacation accruals. All such payments will be integrated with any state disability or other wage reimbursement benefits that you may receive. At no time will you receive a greater total payment than your regular compensation.
3. The employee is responsible for their share of benefit deductions during the leave. If an employee fails to continue payments per pay period, Cobra will be offered.



4. In most circumstances, upon the submission of a medical certification that you are able to return to work, you will be offered the same position held at the time of the leave or a comparable position. However, you will not be entitled to any greater right to reinstatement than if you had been employed continuously rather than on leave.
5. The Comex Group will make reasonable accommodations for an employee's pregnancy, childbirth or related medical condition upon the advice of a health care provider, and if the employee requests such an accommodation. Any employee who requires an accommodation due to pregnancy, childbirth or related medical conditions in order to perform the essential functions for the job should contact the Human Resources Department and request such an accommodation. The employee should specify what accommodation she needs to perform the job, and provide certification of the need for the accommodation from her health care provider. If the accommodation is reasonable and will no time impose an undue hardship, The Comex Group will make the accommodation.

Personal Leave Policy

Policy: Employees are eligible for a personal leave after 30 days of employment, if you experience a situation that affects your ability to perform your duties, and the resolution of the situation is best resolved through a temporary absence from work. Being granted a personal leave of absence does not guarantee your job will be held open for you. The Company reserves the right to fill your position sooner should business needs dictate a necessity to do so.

Procedures

- A. Your request for a personal leave must be made 30 days in advance, except in the event of a bona fide emergency or to extend an FMLA leave. A personal leave of absence may be no longer than 30 days in any consecutive 12-month period.
- B. Approval is required from your manager and Human Resources. Granting of personal leave is at the sole discretion of The Comex Group.
- C. Earned vacation accruals must be applied to your leave until exhausted. Sick leave cannot be accessed for a personal leave.
- D. The employee is responsible each pay period for arranging with Human Resources payment of any benefit deductions normally taken out of your paycheck.

Bereavement Leave Policy

Policy: Employees may request a leave of up to three days following the death of a parent, current spouse's parent, spouse or certified same sex domestic partner, employee or spouse's sibling, child (including a miscarriage during pregnancy) or stepchild, or grandparents of employee or spouse. If you or your spouse, domestic partner, parent, sibling, child or stepchild have been the victim of a violent crime, including domestic violence. Additional leave may be allowed under state law.

Procedures

- A. Employees request the leave from their manager. If you are a full-time employee, bereavement leave will be paid at your normal rate of pay.
- B. In the event of a death, The Comex Group will require you to provide proof of the death and your relationship to the deceased to Human Resources.
- C. Part-time employees are eligible for up to eight (8) hours for bereavement leave.



- D. Some state laws may provide for additional bereavement or compassionate leave under certain circumstances. Contact Human Resources for additional details concerning state laws that may apply.
- E. In the event that you need a bereavement leave exceeding three days, you may request vacation or a personal leave.

California Family/School Partnership Act Leave Policy

Policy: If you are the parent, legal guardian or custodial grandparent of a child or children enrolled in a licensed day care facility or grade school (grades K through 12), you may take off up to 40 hours per calendar year to participate in school activities. Half time workers are allowed up to 20 hours per calendar year. You are limited to no more than eight hours per calendar month, and each absence must be approved by your supervisor. Eligibility is from date of hire.

Procedures

- A. You must provide advanced notice of your absence whenever possible, and you may be required to provide documentation from the school confirming your involvement in school activities.
- B. If both parents are employees of The Comex Group, time off to participate in a specific school activity will be limited to the parent who makes the initial request, except with the approval of both parents' supervisors.
- C. Time off for participation in school activities is unpaid. Accrued vacation time only can be applied to this absence.
- D. Requests for time off under this policy should not be unreasonably refused; if you have questions regarding the appropriateness of an employee's request for family/school partnership time off, please contact Human Resources. In all cases such leave will comply with Federal, State and local laws.

Jury Duty and Court Appearances Policy

Policy: The Comex Group supports and encourages all of our employees to fulfill their civic duties, including jury duty and voting.

Jury Duty Procedures

- A. If you receive a summons for jury service, promptly notify your manager of the Summons, and dates you are scheduled to serve. If you receive a subpoena to appear as a witness in a case in which you are not a party, inform your manager of the date(s) on which you are scheduled to appear.
- B. Copies of the summons or order to appear must be forwarded to Human Resources, and will be added to your personnel file.
- C. Employees will be excused from work for the days required to serve as a juror or appear as a witness. You are expected to report to the court each day, as instructed. If the court releases or excuses you two hours or more before the normal, scheduled end of your shift, you must return to work for the remainder of that day.



- D. At the completion of your service, you must obtain a statement from the court confirming the length of your jury or witness service a witness, as well as any pay you received for jury service.
- E. The Comex Group will pay for up to ten (10) days of jury service per calendar year for eligible employees, provided that you submit proof of service. In the event that your extended absence would have a negative impact on operations, your supervisor may request that you postpone or be excused from jury duty. In such cases, your supervisor will write a letter to the court, outlining the reasons and requesting an excuse or postponement.

Voting Procedures

- A. Employees are expected to vote either before or after the work shift. If this is not possible based on your work hours and the poll hours, hourly employees may take up to three (3) hours off to go to the polls. You will be paid for this time at your normal rate. You must notify your supervisor at least two days prior to Election Day that you need time off to vote. When you return to work, you must provide a ballot stub or other proof that you have cast your vote.
- B. In the event that state law has set requirements that exceed The Comex Group's normal policy, the state law will apply. Managers should check with Human Resources to determine the legal requirements applying to time off for voting in their area.

Transitional Duty Policy

Policy: Transitional Duty assists the employee to progress from disability to full recovery while continuing to be a productive member of the work group, receive full wage compensation for hours worked. This program applies to employees of The Comex Group who have sustained an injury/illness and are cleared by the authorized treating physician to work within defined restrictions.

The Transitional Duty program assignment is temporary, meets the restrictions written by the authorized treating physician and is not considered part of the regular staffing program. Transitional Duty is not a permanent job placement, nor is it a replacement for temporarily vacant positions.

Procedures

1. After the authorized treating physician clears the employee to return to work under specific work restrictions, the Workers' Compensation Administrator partners with the Manager to develop work assignments in compliance with work restrictions.
2. The Workers' Compensation Administrator must determine the employee's eligibility for placement in Transitional Duty and will develop work assignments in compliance with the work restrictions and returning them to full duty when possible.
3. Efforts will be made to accommodate the restrictions of the employee by modifying his/her present work setting. However, work availability may make it necessary to temporarily change an employee's department/location assignments, work hours or weekly work schedule.
4. When an injured/ill employee is released to work but still feels unable to perform regular work activities, sick leave, vacation pay or holiday pay may not be substituted for Transitional Duty.



5. The Workers' Compensation Administrator will maintain ongoing contact with the employee and the manager/designee to assess the work experience and the progress of the employee.
6. The employees are paid their regular, pre-injury hourly wage for all hours worked. All productive hours worked while on Transitional Duty are billed to the employee's home department.
7. Employees that have work restrictions are not permitted to work overtime hours – 8 hours a day and 40 hours a week.
8. Required documents will be governed by individual State Workers' Compensation laws.
9. The Workers' Compensation Administrator will send to employee any required notifications and/or forms to fill out and return to the Administrator as required by State law.
10. All employees will receive an informational letter summarizing the Work Comp/leave process. Time missed from work will count against FMLA/leave time for the rolling year.
11. In Colorado, a Rule 8 letter must be sent to the employee within 7 days.

Accountabilities

Employee

- The employee is responsible for adhering to the written restrictions/limitations and performing their job tasks to the best of their ability. The work standards, company policies, procedures and expectations remain the same.
- The employee must keep all treatment appointments and is responsible for bringing their manager the work status report from each doctor appointment, so restrictions can be reviewed.
- As long as the Workers' Compensation administrator can provide Transitional Duty and the employee is released to work by the authorized treating physician, the employee does not have the right of refusal without jeopardizing benefits and entitlements from the insurance carrier.

Authorized Treating Physician (ATP)

- The ATP is responsible for providing a medical evaluation, necessary treatment, and determining if the injured employee is able to return to work within the scope of temporary and progressive Transitional Duty. Employees and Workers' Compensation will be given a work status report.
- Ensure employees are not asked to work beyond the restrictions established by the authorized treating physician.

Manager

- The employee's manager is responsible for tracking hours of the employee, notifying the Workers' Compensation Administrator each pay period and evaluating performance.
- The manager must ask for the authorized treating physician's note or work status report (release to work) before the employee reports to work and fax it to the Workers' Compensation Administrator.



Workers' Compensation Policy

Policy: It is the policy and goal of The Comex Group to provide a safe and healthful workplace for all its employees and visitors. Reports of injury, illness or exposure are handled according to the standards of OSHA and the laws of the State governing the administration of Workers' Compensation benefits. Employees are provided notice of their rights and responsibilities under State Workers' Compensation laws.

Employees are responsible for knowing The Comex Group Policy which outlines all Workers' Compensation procedures and policies concerning work related injuries. Workers' Compensation is defined as the program mandated by law that provides employees injured on the job with income and medical benefits when a bonafide workers' compensation claim has occurred and has been accepted. Simply filing a workers' compensation claim does not guarantee payment of benefits. All claims must be investigated by the employer, insurance carrier, or their designee.

It is every Employee's responsibility to fulfill all safety policies, business rules and government laws and report all injuries, unsafe behaviors or work conditions to Management and / or Safety Department.

Procedures Management

1. All management staff is accountable for educating their employees on the processes of this policy and implementing it in their department. The Employees Training Form must be completed and signed by the employee and faxed to Human Resources Department.
2. If a work-related injury is reported, the Manager must ensure prompt first aid or medical treatment is sought. If necessary, management should ensure that the employee is accompanied to the appropriate medical treatment facility.
3. All work-related injuries must be reported immediately to the HR or the Workers' Compensation Administrator. The Employees' First Report of Injury form must be completed and faxed to the Workers' Compensation Administrator.
4. Accident investigation and resulting corrective actions are cooperative processes which may include the employee, manager, Safety Officer, and Workers' Compensation Administrator for the purpose of eliminating future accidents or injuries.

Workers' Compensation Administrator – HR

The Workers' Compensation Administrator shall investigate all work related accidents, injuries and occupational illnesses along with the Insurance carrier and keep continuous communication with TPAs, Attorneys, and other external parties, involved in the follow-up of any claim in order to assure the complete employee medical attention and to reduce the claims expenses.

The Workers' Compensation Administrator will maintain ongoing contact with the employee and manager to assess the work experience and the progress of the employee.

The Workers' Compensation Administrator is responsible for notifying the Safety Department of work related accidents, injuries and occupational illnesses.



A monthly claims review meeting will be conducted by the Risk Committee whose participants are Safety Personnel, Workers' Compensation Administrator, Risk Managers, and other persons that could be required.

The Risk Committee is defined as a Quality Control group that provides a safe and healthy environment for employees through safety prevention and intervention programs, reduces risk and loss in the work environment, controls insurance costs through effective case management of claims, exercises oversight of management's responsibilities, and monitors the effectiveness of the risk management functions throughout the organization.

A report must be developed and sent to the Human Resources to inform them the meeting results and corrective actions implementation plan.

Environmental Health and Safety Policy

Policy: The Comex Group recognizes and believes in the importance of conducting its business in compliance with the laws and regulations designed to protect the vital natural resources of clean air, water, and land. We are committed to the health and safety of our employees, our communities and our customers. We are committed to the concept of continuous improvement in environmental and safety performance. Accordingly, we are committed to the following principles:

- We comply with all applicable environmental, health and safety laws and regulations. Where none exist, we set and adhere to stringent standards of our own.
- We make every effort to eliminate or minimize the generation of waste and practice conservation in all areas of our business.
- We are committed to safe, energy efficient and environmentally conscious products and manufacturing processes.
- We train employees to comply with environmental, health and safety requirements.
- We respond to the environmental, health and safety concerns of our employees and the community.
- Environmental objectives and targets are set each year. Self assessments and audits are conducted to ensure our compliance with this policy.

Health and Safety Practices

Policy and Procedures: At The Comex Group, we enjoy an excellent safety record. We require you to follow the best safety precautions. Most accidents can be avoided if proper precautions are taken. Safety calls for cooperative action throughout the organization. We want to create a safe and healthy atmosphere for you. Please report what you feel to be possible safety or fire hazards to your supervisor, manager, a Safety Committee member, or Human Resources immediately. When working with any equipment stay alert. Do not take chances. Safety is an important word but often has real meaning only after an accident. Learn how to handle bulky, heavy items, how to lift, and proper use of tools and equipment. If you are unsure, ASK! Your supervisor will be glad to show you.



It is required that you check and learn the location of all fire extinguishers and exits. This may help save your job, your future, and your life.

The Comex Group employees must take precautions when lifting or moving objects especially those over 25 pounds. Preventative measures such as proper physical lifting, good posture, and exercise are encouraged.

Housekeeping is essential to safety. A scrap of paper, a forgotten box, a fixture on the floor, an open drawer, or just one moment of thoughtlessness can cause an accident or injury. Help keep the aisles clean and avoid littering work areas. Trash, grease, or liquid spilled on the floor can cause a bad fall. If you can't remove it safely yourself, report it to the person in charge.

The Comex Group has developed and implemented a comprehensive injury and accident prevention plan, which is the foundation of our safety program. The plan outlines provisions for communication of safety information, periodic safety training, worksite inspections and general safe practices. Please see your manager or supervisor with any questions.

The Comex Group has developed Safety Committees throughout the organization. These are joint employee-management groups that meet periodically to review injuries and accidents; identify and monitor trends in work-related injuries; openly discuss safety issues; and develop safety awareness materials for distribution. Safety committee members are representative of our varied workforce, and are intended to give all employees a forum to voice safety related concerns or suggestions. If you would like to be considered as a safety committee member for the upcoming year, contact your Environmental Health and Safety Department and communicate your interest.

If you should have an accident, including non-injury and vehicular accidents, or an injury while at work, report it immediately to your supervisor. Action will be taken to see that you receive prompt medical aid, if appropriate. For your protection, The Comex Group carries workers' compensation insurance in accordance with provisions of various state laws. This insurance provides coverage for medical/hospital expenses and lost time benefits resulting from a work related accident or injury.

The Comex Group mandates that all incidents which have the potential to cause bodily injury are investigated and documented by The Environmental Safety Department. The purpose of this investigation is to determine whether an unsafe condition exists, and if so, to take immediate corrective action for the prevention of injuries. Employees are expected to cooperate during this process, and to comply with any requests which will aid in the investigation of the accident.

Hazardous Materials/Wastes

Many of the products used or sold at our facilities are hazardous. The Comex Group has developed and implemented a Hazard Communication program intended to transmit information regarding chemical hazards to all affected employees. Per this program, material safety data sheets (MSDS) are available for each chemical or chemical mixture that is present in your work area. The MSDS provides detailed health and safety information regarding the product. Employees are encouraged to consult the MSDS prior to using any chemical substance.

The Comex Group evaluates all chemicals prior to purchasing, in order to determine what controls are necessary to protect employees from chemical exposure. Ongoing laboratory testing, workplace monitoring and employee training are conducted to ensure that no The Comex Group employee ever suffers adverse health effects from chemical exposure.



Employees are encouraged to direct any questions or concerns regarding workplace chemicals to The Environmental Safety Department.

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) requires that all employers in California inform their employees of any workplace exposure to chemicals which may cause cancer, birth defects or other reproductive harm. Accordingly, we are informing you of the following.

"Warning: materials used and/or sold at The Comex Group locations may contain chemicals known to the State of California to cause cancer, birth defects, or other reproductive harm." The Comex Group is unaware of any negative health effects to the general public created by exposure to the small amounts of chemicals it uses.

Many paint and allied products are extremely flammable. Smoking is not permitted inside any The Comex Group facility. See Smoking Policy for further information.

Constantly be on guard for rags and paper goods containing paint or solvents and any other items that may cause a fire. Please make sure that all rags are laid out flat, individually in a well-ventilated area, or are deposited in a self closing container and out of direct sunlight.

Containers of paint and thinners that have been damaged and can no longer be sealed tightly should be taken to the proper waste area immediately and disposed of or re-canned.

All chemicals that are hazardous must be properly disposed of to prevent environmental pollution. The Comex Group has developed thorough Hazardous Waste Disposal policy which complies with all applicable laws and regulations. In addition to hazardous chemicals, other materials at use in at our facilities have toxic components, such as light bulbs and batteries, and require special management and disposal. Under no circumstances should any of these materials be dumped into the drain or discarded into the municipal trash.

If, at any time, you are confronted with disposing of materials you suspect are classified as hazardous waste and are unsure of the proper method of disposal, make absolutely sure you contact your supervisor regarding proper procedures. Improper disposal of hazardous waste is illegal. The Comex Group has implemented a zero tolerance policy for any employee who knowingly violates hazardous waste disposal laws.

First Aid

prompt medical attention may mean the difference between life and death. For this reason, we require you to report immediately to your supervisor when an accident occurs, regardless of how slight the resulting injury may seem. What may appear as a minor injury may develop into a serious injury. Failure to report an accident/injury to your supervisor may result in disciplinary action. Refer to Policy6.16 Workers Compensation.

Personal Protective Equipment

The Comex Group has conducted a thorough risk assessment of your work environment and evaluated all exposures which have the potential to cause injury or illness. Whenever possible, these exposures have been eliminated. However, due to the nature of our business operations, certain hazards cannot feasibly be removed (i.e. chemicals, powered industrial trucks, electricity, and machinery). In these instances, personal protective equipment (PPE) is required. The most common types of PPE used at The Comex Group facilities are safety glasses, hard hats, chemical resistant gloves, face shields, steel-toed boots, respirators and earplugs.



The Comex Group furnishes all personal protective equipment at no cost to employees. Employees must wear the required PPE at all times, and should maintain it in good working condition. Failure to do so may result in disciplinary action. If there are any defects in the equipment or if it does not fit properly or otherwise perform the intended function, you should immediately bring this to your supervisors' attention. If the required PPE is not available for a specific task, you should not perform that task until appropriate supplies are provided.

Equipment and Machinery

Energized equipment poses a multitude of hazards, and should be operated with extreme caution. A variety of equipment is utilized in our facilities, ranging from industrial machinery, forklifts and pallet jacks, auto tint machines, paint shakers and shrink wrappers. You should never operate a piece of equipment unless you are authorized to do so and have been properly trained on safe operating procedures. Employees should never attempt to perform maintenance or troubleshoot defective equipment. It is very dangerous to use your hands or any other body parts near moving mechanical components, even for minor adjustments. If a piece of equipment or machinery is not in good operating condition, you should immediately discontinue use and tag it "Out of Order" until it can be repaired and restored to safe operating condition.

The Comex Group employees should never use a piece of equipment for any other purpose other than that which is suited and intended for. Equipment should not be abused or strained beyond its safe working load. Machine guards and other safety devices should never be bypassed, removed or damaged. Warning labels must remain affixed to the equipment and should not be removed, defaced or painted over.

At The Comex Group, we believe that our employees are our greatest asset and the key to our organization's success. Our primary goal is the health and well-being of our workforce. No employee should suffer adverse health effects as a result of the work that they perform for The Comex Group. A successful safety program depends upon the diligence and cooperation of employees at every level. We urge you to work safe everyday and to demand the same commitment from all of your peers.

The Comex Group expects all employees to maintain a professional appearance and appropriate attire during work hours.

Policy and Procedures: While you are working, you are expected to adhere to the dress code or attire standards for your region or job area. The Comex Group sets different dress codes for the different areas and regions of our business, as we deem appropriate or necessary. Individual departments or work areas may also set specific policies. Any exceptions to the stated policy require prior approval. Your supervisor will notify you of the dress code or attire standards that apply to you.

If you violate the dress code or attire standards for your workplace, your supervisor may require you to leave the workplace to change clothes or otherwise correct the violation. Any time off work to correct a dress code violation will be unpaid. Repeated violations of the dress code will be subject to corrective or disciplinary action.

In many cases, the company requires employees to wear uniforms. If uniforms are required for your job, you will be advised of this by your supervisor as well as how and where uniforms are ordered or obtained.

In such cases, employees are responsible for the care and maintenance of their uniforms. Employees who demonstrate repeated disregard for such care and maintenance may be subject to disciplinary action. Normal wear and tear is acceptable.



Letter of Commitment

This letter of commitment must be signed and attached to the file of every member, administrative advisor, shareholder and collaborator of any of the companies of The Comex Group, providers and customers.

As an employee of The Comex Group, I hereby state that I have received, read and agreed to the commitments, values and norms of conduct contained in the Code of Ethics and Conduct and I commit myself to guide my actions in strict compliance with the Code in order to keep the trust that other collaborators, customers, providers and authorities have placed in the organization that I belong to. The guidelines and the responsibilities under my supervision arising from the Code are part of the job I was hired to carry out and require that I act in accordance with the applicable State, Federal or local laws and/or Regulations, and the Internal Regulations of this entity. This commitment shall be ratified annually for as long as I work for the company.

I hereby understand that by signing this letter it does not constitute nor should it be interpreted as an employment contract for a specified time, nor guarantee the continuation of my employment relationship.

I understand It is compulsory to give confidential treatment to all the information of The Comex Group. We must commit to protect this information from disclosure to others. We must understand as (confidential information) that which entails all types of exclusive, technical or business-related, non-public information, such as: records, reports, formulas, documents, machinery, processes, plans, methods and tools of the company and manual that might be used in such a way that they beneficially affect the interests of The Comex Group.

Having read this **Letter of Commitment** , I understand and accept the contents and scope of this agreement.

Printed Full Name _____

Location _____ Employee Number _____

Signature: _____ Date _____

This letter of commitment must be delivered to the Human Resources Department in a time period no longer than 7 calendar days after receiving it. The deferral of delivery of this letter does not exempt the observance of the Code of Ethics and Conduct nor the potential sanctions described in it.