

VIRGINIA SUPPLEMENT TO EMPLOYEE HANDBOOK

This is a supplement to the Zippo Employee Handbook (“Handbook”), specifically covering policies regarding Virginia state and local employment provisions. In addition to the Handbook, the following policies apply only to employees of Zippo (the “Company”) in Virginia.

Where not modified herein, the policies and procedures in the Handbook continue to apply to all employees, including the at-will employment policy. To the extent policies in the Handbook conflict with this supplement, the policy or provision that is more generous to the employee will govern, but in no event shall this result in duplicate or greater benefits than those provided under either the Handbook or state law.

Virginia Personnel Files

Upon written request, the Company will furnish copies of certain records from their personnel files, generally within 30 days of the Company’s receipt of the written request. Employees may receive copies of documents reflecting: their dates of employment; wages/salary; job description/title; and any injuries suffered while working. Certain documents may not be included, such as documents that have been destroyed under the Company’s record retention policy, or in certain circumstances where a physician or psychologist has indicated providing the documents may result in harm. The Company may charge a reasonable fee for copying any documents that are in a hard copy format.

Virginia Crime Victim Leave

The Company will grant reasonable and necessary leave from work, without pay, to employees who are victims of a crime to exercise their rights to be present at criminal proceedings pertaining to the crime. Prior to taking leave under this policy, eligible employees must provide the Company with reasonable notice of the need for leave including a copy of the form provided to the employee by the law-enforcement agency pursuant to subsection A of § 19.2-11.01 of the Code of Virginia and if applicable, notice of each scheduled proceeding. However, the Company may limit the leave provided under this section if the employee's leave creates an undue hardship to the company's business. Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

Virginia Election Officer Leave

Employees who serve as election officers may take unpaid leave to fulfill those duties. Employees may but are not required to use any available paid time off for time spent serving as an election officer. Employees needing such leave should notify their direct supervisor as soon as they are aware of the need for leave. The Company reserves the right to require documentation of service.

Virginia Civil Air Patrol Leave

Employees who are volunteer members of the Civil Air Patrol may take unpaid leave, without loss of seniority, accrued leave, benefits, or efficiency rating, as follows: (a) employees may take up to 10 workdays per federal fiscal year to engage in training for emergency missions with the Civil Air Patrol; or (b) employees may take up to 30

workdays per federal fiscal year to respond to an emergency mission as a Civil Air Patrol volunteer. Employees must give as much notice as possible of the intended dates of leave and must provide both certification that they have been authorized to respond to or train for an emergency mission and verification from the Civil Air Patrol of the emergency need of the employee's volunteer service. Employees may, but are not required to, use any available paid time off during this unpaid leave.

Virginia Pregnancy Accommodation

The Company will not discriminate against employees based on pregnancy or pregnancy-related conditions, including nursing. Upon request, the Company will provide reasonable accommodations to women affected by pregnancy or medical conditions related to pregnancy, unless doing so would impose an undue hardship on the Company. Reasonable accommodations may include more frequent or longer bathroom breaks, breaks to express breast milk, access to a private location other than a bathroom for the expression of breast milk, acquisition or modification of equipment or access to or modification of employee seating, a temporary transfer to a less strenuous or hazardous position, assistance with manual labor, job restructuring, a modified work schedule, light duty assignments, and leave to recover from childbirth. Employees needing such leave should contact Human Resources.