



ET Investments, LLC

And its subsidiaries

EMPLOYEE HANDBOOK 6.0

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WELCOME

Welcome to ET Investments, LLC and its subsidiaries (collectively "Company"). We are pleased to have you join our team of talented, dedicated, professional personnel, and hope your addition will serve to strengthen our team. We hope you will find your work to be both challenging and rewarding.

MISSION STATEMENT

"To deliver value and high-quality title insurance products and services to our customers. Value demands we render high-quality service, in a professional, ethical, and forward-thinking manner."

ABOUT THIS HANDBOOK

THIS HANDBOOK IS DESIGNED TO ACQUAINT YOU WITH THE ORGANIZATION AND PROVIDE YOU WITH SUMMARY INFORMATION ABOUT WORKING HERE. THE GUIDELINES IN THIS HANDBOOK ARE NOT ALL- INCLUSIVE, BUT INTENDED TO PROVIDE A SUMMARY OF SOME OF THE COMPANY'S GUIDING PRINCIPALS. THIS EDITION OF THE HANDBOOK REPLACES AND SUPERSEDES ALL PREVIOUSLY ISSUED EDITIONS.

THIS HANDBOOK CANNOT ANTICIPATE ALL CIRCUMSTANCES OR QUESTIONS. AFTER READING THIS MATERIAL, IF YOU HAVE QUESTIONS, PLEASE SPEAK WITH YOUR IMMEDIATE SUPERVISOR OR THE HUMAN RESOURCES DEPARTMENT. ALSO, THE NEED MAY ARISE TO CHANGE THE GUIDELINES AS DESCRIBED IN THIS EDITION. THE COMPANY THEREFORE RESERVES THE RIGHT TO INTERPRET THEM OR CHANGE THEM WITHOUT PRIOR NOTICE.

NOTHING CONTAINED IN THIS HANDBOOK CAN BE CONSIDERED AS A CONTRACT OF EMPLOYMENT, PROMISE, OR ASSURANCE REGARDING THE DURATION OF, RIGHT TO, OR BENEFIT OF EMPLOYMENT.

THE LANGUAGE USED IN THIS HANDBOOK IS NOT INTENDED TO CONSTITUTE A CONTRACT OF EMPLOYMENT, EITHER EXPRESS OR IMPLIED. EMPLOYMENT WITH THE COMPANY IS AT WILL. EMPLOYEES HAVE THE RIGHT TO END THEIR WORK RELATIONSHIP WITH THE COMPANY FOR ANY REASON, WITH OR WITHOUT ADVANCE NOTICE. THE COMPANY HAS THE SAME RIGHT.

NO INDIVIDUAL REPRESENTATIVE OF THE COMPANY OR ITS SUBSIDIARIES HAS THE AUTHORITY TO ENTER INTO AN AGREEMENT OF EMPLOYMENT FOR ANY SPECIFIED PERIOD. ONLY THE EMPLOYMENT COMMITTEE CAN ENTER SUCH AN AGREEMENT AND SUCH AGREEMENT MUST BE IN WRITING, SIGNED BY A MEMBER OF THE COMMITTEE AND THE EMPLOYEE.

EQUAL EMPLOYMENT OPPORTUNITY / UNLAWFUL HARASSMENT

The Company is dedicated to the principles of equal employment opportunity in any term, condition or privilege of employment. We do not discriminate against applicants or employees on the basis of age 40 and over, race, sex, color, religion, natural origin, disability, military status, genetic information genetic information, marital status, sexual orientation, or any other status protected by state or local law. This prohibition includes unlawful harassment based on any of these protected classes.

Unlawful harassment includes verbal or physical conduct, which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. This policy applies to all employees including managers, supervisors, co-workers, and non-employees such as customers, clients, vendors, consultants, etc.

ADA and Religious Accommodation

The Company will make reasonable accommodation for qualified individuals with known disabilities unless doing so would result in an undue hardship to the Company or cause a direct threat to health or safety. The Company will make reasonable accommodation for employees whose work requirements interfere with a religious belief, unless doing so poses undue hardship on the Company. Employees needing such accommodation are instructed to contact their supervisor or ET Investment's HR Department immediately

SEXUAL HARASSMENT

Because sexual harassment raises issues that are to some extent unique in comparison to other harassment, the Company believes it warrants separate emphasis.

The Company strongly opposes sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; 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.

All employees are expected to conduct themselves in a professional and businesslike manner at all times. Inappropriate sexual conduct that could lead to a claim of sexual harassment is expressly prohibited by this policy. Such conduct includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written form, such as cartoons, posters, calendars, notes, letters, E-mails;
- Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping or questions about another's sex life, or repeated unwanted requests for dates; or
- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.

EEO / HARASSMENT COMPLAINT PROCEDURE

If you believe there has been a violation of the EEO policy or harassment based on the protected classes (age 40 and over, race, sex, color, religion, natural origin, disability, military status, genetic information or marital status, domestic partner, sexual orientation as they relate to state or local laws where you are employed or any other status protected by state or local law, including sexual harassment), use the following complaint procedure. The Company expects employees to make a timely complaint to enable the Company to investigate and correct any behavior that may be in violation of this policy.

Report the incident to Human Resources, who will investigate the matter and take appropriate corrective action. Your complaint will be kept as confidential as practical. If you feel you cannot go to Human Resources with your complaint, you should report the incident to any member of the senior management team.

If the Company determines that an employee's behavior is in violation of this policy, appropriate disciplinary action will be taken against the offending employee, up to and including termination of employment.

The Company prohibits retaliation against an employee for filing a complaint under this policy or for assisting in a complaint investigation. If you perceive retaliation for making a complaint or your participation in the investigation, follow the complaint procedure outlined above. The situation will be investigated.

CLASSIFICATION OF EMPLOYEES

For administrative purposes the Company classifies employees as follows:

Full-time:	Employees regularly scheduled to work thirty-two (32) hours or more per week. ¹ Employees who are taking university level courses and are classified as full-time students (12-credit course or more) and are scheduled to work at least twenty-four (24) hours per week may be classified as full-time employee. In each case, course work and full-time status must be approved by Human Resources and your direct supervisor.
Part-time:	Employees regularly scheduled to work less than thirty (32) hours per week.
Temporary:	Employees hired to work either full-time or part-time hours, but only for a specified period or for a specific project(s). Temporary employees are not eligible for vacation accrual or holiday pay.
Non-Exempt:	Employees eligible for overtime pay. Non-Exempt employees are eligible for paid overtime at one and one-half times their regular rate of pay for all hours worked in excess of forty (40) hours per week or as state laws require or, half time in excess of any fluctuating or modified workweek agreement.
Exempt:	Employees who have duties which qualify them for Exempt status and who are classified as Exempt. Exempt Employees are not eligible for overtime pay.

Direct any questions regarding your employment classification to the Human Resources Department.

¹ For Medical Benefit eligibility only, employees regularly scheduled to work thirty (30) hours or more per week are deemed full-time.

TIME RECORDING

TIME SHEETS

Time sheets are used by the Company to calculate an employees pay and paid time off balance. It is very important that they are accurate and complete. Nonexempt employees are expected to submit accurate and complete time records reflecting all hours worked. Employees should notify Human Resources immediately if they are ever directed to report anything other than an accurate and complete time record reflecting all hours worked. All reports will be investigated and, as applicable, appropriate corrective action will be taken. The Company will not tolerate retaliation against employees for making a report or participating in an investigation.

If an Employee believes there is a discrepancy between the Company's records and their records, regarding either their work hours reported or accrued leave, the Employee should promptly contact their supervisors and/or the Payroll/Benefits Department with any questions about how their pay and/or leave is calculated.

It is highly recommend that Employees review their online paystubs for accuracy each Pay Period. If there is a question or mistake in their pay, including amounts paid, withholdings or other deductions, Employees must promptly notify their supervisor and/or the Payroll/Benefits Department.

SUBMITTING TIME SHEETS

Non-exempt employees are required to keep an accurate record of hours worked on a daily basis. Electronic Time Sheets are utilized to identify and calculate hours worked, hours to be paid from various leave accounts, time without pay, absences, etc. All time reported should be absolute accurate time.

All employees, non-exempt and exempt, are required to report vacation, sick leave, personal days and holiday leave taken during the preceding pay period, ideally before it is taken for planned days off and immediately upon returning from any sick leave or unplanned days off.

All employees are responsible for approving their Time Sheets by the close of business on Payday. Supervisors need to approve their employees' Time Sheets within three (3) business days following the end of each pay period.

WORKING HOURS

The normal workday will consist of eight (8) hours from 8:00 a.m. to 5:00 p.m., Monday through Friday, with an unpaid one-hour meal period between the hours of 11:00 a.m. and 2:00 p.m. for non-exempts. Unused lunch periods cannot be used to extend the meal period or shorten the length of the workday.

Some employees may be given the option to adjust their schedule either earlier or later than the normal workday. Employees who are given this option and adjust their schedule will be required to keep their adjusted schedule unless it is formally adjusted with the approval of their immediate supervisor.

Scheduled hours may vary as determined by the department or office to which each employee is assigned. Variations in work schedules must be coordinated and approved, in advance, through the department head or immediate supervisor.

BREAKS

Non-exempt employees may take two (2) paid 15-minute breaks during the workday, one (1) in the morning and one (1) in the afternoon. Unused break periods cannot be used to extend the meal period or shorten the length of the workday.

If this guideline conflicts with State law, the minimum requirement under the applicable State law will be substituted for the guideline.

OVERTIME

From time to time, a supervisor may require or permit an employee to work overtime. Non-exempt employees are paid at the rate of time and one-half ($1\frac{1}{2}$) their regular hourly rate for hours actually worked in excess of forty (40) during the established workweek, or in accordance with state law. For the purpose of calculating overtime, the normal workweek is Sunday through Saturday, beginning at 12:01 a.m. Sunday and ending 12:00 midnight on Saturday. Paid time off of any variety (holiday, vacation, sick time, etc.) is not considered actual time worked and will not be counted in the calculation of overtime compensation. Non-Exempt employees who are paid a salary and are party to a fluctuating or modified workweek agreement will be paid half time ($\frac{1}{2}$) for hours in excess to their agreed-upon schedule or hours.

Please note that non-exempt employees are required to obtain the approval of their supervisor or manager prior to working overtime.

PAY DAY

Wages are paid on a semi monthly basis (24 times annually), on the 15th and the last day of the month. If either of these paydays fall on a weekend or holiday, payment is generally made on the preceding workday. However in some cases, payment will be made on the following workday. Non- exempt employees are paid directly from their timesheet as approved by the manager. Exempt employees and Salaried Non-Exempt employees' adjustments, such as overtime pay or adjustments to pay may be made in the subsequent paycheck. Any employee detecting an error on his or her paycheck should advise the Payroll Department immediately.

Exempt employees are paid their base wages on a current, semi-monthly basis. Non-Exempt employees are paid for their actual worked hours one (1) pay period in arrears on a semi monthly basis

All employees have the option of receiving a payroll check or being paid through an automatic direct deposit to your bank. For more information contact the Human Resources Department.

COMMISSION PAY

With respect to the payment of commissions, as applicable, Employee must be employed on the date commissions are paid. To confirm your company's date of commission pay, please consult your direct supervisor.

DEDUCTIONS FROM PAY

Employees may request that certain payments for benefits program participation be deducted from their paychecks. For initial use, at the time of benefit enrollment, participants will be provided an Authorization for Payroll Deduction Form. Once initially authorized, deductions for elected programs may be amended by the Company to include rate adjustments as determined by the benefit providers and the Company. In such instances the Company will make an effort to notify all plan participants of the rate adjustments in advance. Subsequent modifications or cancellation of a deduction must be authorized in writing by the employee and submitted to the Human Resources Department.

PAY FOR EXEMPT EMPLOYEES

Exempt employees must be paid on a salary basis. This means exempt employees will regularly receive a predetermined amount of compensation each pay period on a weekly basis. The Company is committed to complying with salary basis requirements which allows properly authorized deductions.

If you believe that an improper deduction has been made to your salary, you should immediately report this information to your direct supervisor, or to the Human Resources Department. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, you will be promptly reimbursed.

PAY ADVANCES

Advances or loans on future earnings are generally not granted to employees. In the rare instance that such an advance may be made, an up-front, signed agreement / promissory note will be required unless other arrangements were made prior to the advance.

PERFORMANCE APPRAISAL

Employee performance is important to the Company. Performance Appraisals can provide an opportunity for employees to discuss performance and job expectations.

New employees may receive complete performance appraisals at the end of a specified length of service. Temporary employees converting to regular status may receive a performance appraisal at that time. Thereafter, the Company attempts to schedule annual performance appraisals. Performance appraisals may be given whenever such reviews are deemed appropriate by management.

Wage adjustments are not generally a part of an appraisal process but individual circumstances may vary. Performance is a factor when wages are reviewed by management.

COMPENSATION ADMINISTRATION

Salary or wage ranges for specific positions are usually based on our compensation philosophy, current economic business conditions, and competitive analysis of other companies in our industry and like industries. Individual salaries are typically based on performance, skill, knowledge, ability, qualification, education and level of expertise, contribution, and responsibilities.

Salary increases are not automatic and are based upon individual performance, level of responsibility, and profitability of the Company.

ATTENDANCE

Regardless of your position with the Company, your punctuality and regular attendance is considered an essential function and is necessary for efficient operation of the business. Employees are expected to be at work and on-time as scheduled.

If it is necessary for you to be absent from work due to illness, injury or an emergency situation, you must notify the Company as soon as possible. Generally, notification should be made within 15 minutes of the start of the scheduled workday. Employees must contact their immediate supervisor, or if unavailable, the department manager. Employees must notify their direct supervisor of the specific reason for their absence and expected return date. Voice mail messages, e-mail messages, or messages left with the receptionist or co-workers are not acceptable.

Absenteeism or tardiness that is excessive will not be tolerated.

Employees who are absent for three (3) consecutive workdays without notifying their supervisor will normally be terminated.

TIME OFF WITHOUT PAY

All time off without pay that is not classified as a medical leave of absence requires the advance written approval of the employee's direct supervisor. Time off without pay generally will not be granted to employees when any form of earned time off is available. See FMLA guidelines for medical leave policy and notice requirements.

Additional Pay Provisions Regarding Attendance:

If an Employee has exhausted all their vacation time, sick time, and personal days and then subsequently is absent, they will not be paid wages, bonuses or commissions and will not accrue paid time off during the time of the absence.

However, if the company mandates days off without pay, the employee will continue to accrue time and will be paid bonuses and commissions earned during the time of absence, but will not be paid base wages.

If the employee takes voluntary days off without pay, when requested by the company, the employee will continue to accrue time and will be paid bonuses and commissions earned during the time of absence, but will not be paid base wages.

HOLIDAYS

Currently, ten (10) paid holidays are provided each year to full-time employees. Seven (7) of these holidays are considered Core Holidays observed by the entire company along with Three (3) floating holidays that are determined by local management. The Three Floating Holidays can change year to year.

SEVEN CORE OBSERVED HOLIDAYS

New Year's	Day
Presidents	Day
Memorial	Day
Independence	Day
Labor	Day
Thanksgiving	Day
Christmas	Day

Makeup Days

We also recognize that at times companies must be open on certain holidays. If an eligible employee is required to work on a recognized Holiday (either a Generally Observed Holiday or a Manager Determined Holiday), the employee is entitled to take a "Makeup Day" within 30 days of the Holiday. Employees must schedule this day with manager's approval to avoid company disruption.

When a Company observed holiday falls on a Saturday, it will generally be observed on the preceding Friday. If the holiday falls on a Sunday, it will generally be observed the following Monday. The Company will publish a schedule showing actual holiday observed dates at the beginning of each calendar year.

Non-exempt employees must have worked their regularly scheduled shift immediately before and after the holiday in order to be eligible for holiday pay; or their absence must be due to a scheduled and pre-approved absence. Holidays are not considered actual hours worked and will not be counted in the calculation of overtime compensation.

Holiday pay is not granted to temporary or part-time employees. Employees on a leave of absence are not eligible for Holiday pay except in rare circumstances and then only as approved by management.

Cap Vacation Plan

The following Vacation policy applies to ET Investments and its Subsidiaries Non-Exempt Employees (Hourly) effective January 1, 2023.

Full Time non-exempt employees are eligible for vacation benefits. Full time non-exempt employees accrue vacation hours based on completed pay periods in accordance with the table below; provided, however, a Manager or President of an individual agency may provide for a different accrual rate for his or her employees, but in no event will such accrual rate be less than as set forth below.

Years of Service	Accrual Rate	Accrual Cap
<1-5	3.33	80
6-10	5.0	120

We encourage employees to use all their earned vacation time off each year. Employees may carry over unused accrued vacation time into the next calendar year. However, an employee cannot accrue hours beyond their vacation cap. Employees that reach their cap will not accrue additional hours until their accrual drops below their respective accrual cap.

Pay in lieu of taking vacation time is not allowed.

Time off must be requested two weeks in advance whenever possible and approved by management. Approval may be denied due to business needs. Employers should use discretion in requesting days off in order to achieve appropriate work/life balance in light of their professional obligations.

In order to have minimal impact on work schedules, we strongly encourage you to plan and schedule your vacation as far in advance as possible. The earliest requests will receive priority for scheduling consideration and coordination.

Vacation days may be taken individually or collectively, however vacations in excess of more than two (2) consecutive work weeks will require prior approval by the employees Manager.

Vacation is not considered actual hours worked, and will not be counted in the calculation of overtime hours.

Employees on a leave of absence do not accrue vacation time.

Upon separation of employment, employees will receive pay for any unused accrued vacation time.

NOTE: Temporary Employees are not eligible for vacation accrual.

Discretionary Vacation Plan

The following Discretionary Vacation policy applies to ET Investments and its Subsidiaries Exempt (Salaried) Employees effective January 1, 2023.

This policy applies to full time exempt employees. Non-exempt employees should refer to the PTO Accrual Cap Plan.

Employees covered under this plan will no longer earn, vest or accrue vacation balances. Instead of having a set amount of paid vacation, there is no set minimum or maximum amount of available paid vacation in a given year.

The Discretionary Vacation Plan does not apply to absences other than pre-planned vacation. Please see our separate Sick Leave Policy for questions about sick leave.

While an eligible employee takes time off under the Discretionary Vacation Plan, ET and its subsidiaries will continue to pay their base Salary.

All requests will be submitted through Insperity as usual.

Time off must be requested two weeks in advance whenever possible and approved by management. Approval may be denied due to business needs or individual work performance. Employers should use discretion in requesting days off in order to achieve appropriate work/life balance in light of their professional obligations.

In order to have minimal impact on work schedules, we strongly encourage you to plan and schedule your vacation as far in advance as possible. The earliest requests will receive priority for scheduling consideration and coordination.

Vacation days may be taken individually or collectively, however vacations in excess of more than two (2) consecutive workweeks will require approval by the employees Manager and HR.

If an employee becomes eligible mid-year for the Discretionary plan, hours they accrued under the Accrual cap plan will be preserved and moved to the Discretionary plan to be used in the future or paid out at the time of separation to the extent that any accrued hours remain at the time of separation.

Sick Leave Policy

Full-time employees accrue paid sick leave per their states regulations. Sick leave can be accrued up to a cap of 240 hours. If you have a question regarding your sick leave accrual please reach out to your management or payroll.

Sick leave is an important benefit. It is intended for absences due to your own illness or injury, the illness or injury of a dependent, or for provider appointments.

Sick leave is not allowed to be utilized for vacation time, and sick leave WILL NOT BE PAID OUT UPON SEPARATION.

Sick leave is granted to full time employees only and cannot be accrued when an employee is on a leave of absence.

Sick leave is not considered actual hours worked and will not be counted in the calculation of overtime compensation.

The Company reserves the right to request a physician's note if an employee is absent for four (4) or more consecutive workdays. In addition, depending on the nature of the illness, the Company may also require a physician's release to return to work.

Employees who are absent for three (3) or more consecutive days without notification are subject to termination at the discretion of their manager.

Should an employee need to take a medical leave or FMLA leave, only accrued sick leave may be used.

Please reach out to Human Resources should you believe that your personal or family situation may be subject to FMLA. In addition, based upon the circumstance, you may be contacted by Human Resources or Payroll if we believe that your absences are subject to or qualify for FMLA.

FAMILY AND MEDICAL LEAVE ¹

The Company provides up to 12 weeks of unpaid, job-protected leave to eligible employees for the following reasons:

- Incapacity due to pregnancy, prenatal medical care, or child birth.
- To care for the employee's child after birth, or placement for adoption or foster care.
- To care for the employee's spouse, son or daughter, or parent, who has a serious health condition.
- Serious health condition that makes the employee unable to perform the employee's job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on active duty or called to active duty status in the Armed Forces, National Guard, or Reserves may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is: (1) a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness*; or (2) a veteran who was discharged or released under conditions other than dishonorable at any

time during the five-year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.*

*The FMLA definitions of “serious injury or illness” for current service members and veterans are distinct from the FMLA definition of “serious health condition.”

Benefits and Protections

During FMLA leave, the Company maintains the employee’s health coverage under any group health plan on the same terms as if the employee had continued to work. Employees must continue to pay their portion of any insurance premium while on leave. If the employee is able but does not return to work after the expiration of the leave, the employee will be required to reimburse the Company for payment of insurance premiums during leave.

Upon return from FMLA leave, most employees are restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms. Certain highly compensated employees (key employees) may have limited reinstatement rights.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee’s leave. As with other types of unpaid leaves, paid leave will not accrue during the unpaid leave. Holidays, funeral leave, or employer’s jury duty pay are not granted on unpaid leave. (Employers must modify this section to indicate whether paid leave continues to accrue during FMLA.)

Eligibility Requirements

Employees are eligible if they have worked for this Company for at least 12 months, for 1,250 hours over the previous 12 months, and if they work at a work site with at least 50 employees within 75

miles. (Employers may elect not to enforce this last requirement for employee relations’ reasons, such as wanting consistency between small and large work sites.)

(If applicable, employers may include the statement: “Special hours of service eligibility requirements apply to airline flight crew employees.”)

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee’s job, or prevents a qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive full calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Use of Leave

The maximum time allowed for FMLA leave is either 12 weeks in the 12-month period as defined by the Company, or 26 weeks as explained above. (Employers should specify here their definition of 12-month period. For example: The Company uses the 12-month period measured forward from the first day of an employee’s leave.)

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the

Company's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Employees taking intermittent or reduced schedule leave based on planned medical treatment and those taking intermittent or reduced schedule family leave with the Company's agreement may be required to temporarily transfer to another job with equivalent pay and benefits that better accommodates that type of leave.

Substitution of Paid Leave for Unpaid Leave

The Company requires employees to use accrued paid leave while taking FMLA leave. Paid leave used at the same time as FMLA leave must be taken in compliance with the Company's normal paid leave policies. If an employee's leave of absence does not constitute paid leave as defined in the Company's paid leave policies, the employee cannot use accrued paid leave, but can take unpaid leave. FMLA leave is without pay when paid leave benefits are exhausted. (Employers should modify this paragraph to be consistent with their paid leave guidelines; e.g., what leave is used first and whether the employer will allow employees to supplement workers' compensation benefits or disability paid with paid leave.)

Employee Responsibilities

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with the Company's normal call-in procedures.

Employees must provide sufficient information for the Company to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions; the family member is unable to perform daily activities; the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the

Company if the requested leave is for a reason for which FMLA leave was previously taken or certified.

Employees also may be required to provide a certification and periodic recertification supporting the need for leave. (If not required in all cases, the employer should specify the circumstances requiring certification.) The Company may require second and third medical opinions at the Company's expense. Documentation confirming family relationship, adoption, or foster care may be required. If notification and appropriate certification are not provided in a timely manner, approval for leave may be denied. Continued absence after denial of leave may result in disciplinary action in accordance with the Company's attendance guideline. Employees on leave must contact the Human Resources Manager at least two days before their first day of return.

The Company's Responsibilities

The Company will inform employees requesting leave whether they are eligible under FMLA. If they are, the notice will specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the Company will provide a reason for the ineligibility.

The Company will inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the Company determines that the leave is not FMLA-protected, the Company will notify the employee.

Unlawful Acts

FMLA makes it unlawful for the Company to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA.
- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against the Company.

FMLA does not affect any federal or state law prohibiting discrimination, or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights.

OTHER LEAVE

The Company will also adhere to other leave granted by the various states in which the company operates. Some of these are:

Domestic Abuse Leave (CO)

Employees subject to domestic abuse may be eligible for a leave of absence. Please see the Human Resources Department for more information.

Parental Involvement Leave (Paid leave substitution)

The Company may grant parental involvement leave to eligible employees to attend academic activities for their school-aged children (up to 18 hours). Please see the Human Resources Department for more information.

Family Care Act Leave (Colorado only) – FAMLI

The Company provides up to 12 weeks of unpaid leave to eligible employees to care for their partners in a civil union or domestic partnership, who have serious health conditions. Generally, leave under the Family Care Act is administered consistent with FMLA regulations. Contact your supervisor or Human Resources if you need family care leave. This leave runs concurrently with FMLA. An employee may elect to use all or a portion of his/her accrued leave prior to going on FAMLI but is not required to; however, employee cannot collect both FAMLI benefits and receive payment based on their accrued leave at the same time.

BEREAVEMENT LEAVE

Currently, full-time and part-time employees may receive up to three (3) paid workdays for absences due to the loss of an immediate family member. For this purpose “immediate family member” shall be defined as a spouse, civil union partner, domestic partner, parent, parent-in-law, child, sibling, grandparent, or any of these in a step or legal guardian relationship.

One (1) paid day may be taken to attend the funeral of any other relative or friend.

Additional time off, without pay, may be granted at the discretion of the Company President or management.

MILITARY LEAVE

Employees granted a military leave of absence are reinstated and paid in accordance with the laws governing veterans' re-employment rights.

JURY DUTY

The Company supports each employee's civic responsibility to serve as a prospective juror. Currently employees summoned for jury duty will be paid their regular wages up to three (3) working days (or in accordance with applicable state law) for time required to serve. Thereafter, upon receipt of proper documentation, the Company will pay the difference between the regular salary or wage and the court paid juror/witness fee for an additional (7) days. Should an employee serve more than ten (10) working days, the employee may take unpaid time off through the duration of the trial. If excused from jury or witness duty during regular work hours, the employee must report to work promptly.

The employee must provide as much advance notice as possible. The Company requires a copy of the Summons and Juror Service Certificate for an employee performing such duty.

BENEFITS PLANS

Plans change from time to time. In the event the handbook information conflicts with the actual terms and conditions of coverage, the latter governs.

Insurance Benefits Plans

The Company's benefits package includes a number of different plans for eligible staff members. Currently, the Company offers the following plans:

Medical Insurance Plan	helps pay covered medical expenses for yourself and your family at group rates.
Dental Insurance Plan	provides to you and your eligible dependents dental coverage at group rates
Vision Insurance Plan	provides to you and your eligible dependents vision coverage at group rates
Long-Term Disability	helps replace a portion of your salary if you suffer from a covered disability for a period of time.
Life Insurance Plan (AD&D)	provides term coverage at 1 x your annualized wage up to a maximum of \$50,000. Current policy includes provisions for accidental death and dismemberment. Policy restrictions may apply. <i>Note: Some companies may offer more company-paid life than stated above.</i>
Voluntary-Supplemental Life	provides term coverage buy up options, subject to plan limitations, policy restrictions and conditions for you, your spouse and/or your child(ren)
Voluntary Disability Plans	Plans such as Mutual of Omaha may be offered to allow employees to buy their own short term disability plans or other types of specific coverage.

Full-Time Employees working 30 hours per week or more are eligible for participation in the Company sponsored insurance programs. Employees are eligible on the 1st day of the month following the date of employment.

Note: Any eligible employee failing to enroll in certain benefit plans when eligible may be unable to enroll until the next annual open enrollment period. However, exceptions such as a change in life status (marriage, divorce, death, or loss of coverage by spouse) may preclude such restrictions. Voluntary Life is usually only offered at initial eligibility.

Benefit providers may require plan specific forms to be completed in notification of a life status change. Please contact the Human Resources Department to obtain plan specific documentation based on actual benefit elections. All related documentation must be submitted directly to the Human Resources Department.

A chart of current premiums as well as a summary description for the group dental insurance benefit is available from the Human Resources Department.

Plans change from time to time. In the event the handbook information conflicts with the actual terms and conditions of coverage, the latter governs.

Health Flexible Spending Account (SECTION 125 PLAN)

Employees regularly scheduled to work at least thirty (30) hours weekly may participate in the Section 125 Flexible Spending Plan. The Company offers a pre-tax contribution option, which is often known as a Section 125 or Flexible Spending Account. The plan allows employees pre-tax payroll deductions for the payment of spousal and/or dependent medical and/or dental premiums. Additionally, participants may contribute additional sums on a pre-tax basis for anticipated, non-reimbursable, medical/dental expenses (co-pays, uncovered dental work, eyeglasses, prescriptions, etc.) and dependent care expenses.

The deduction limit will be established once annually. Newly hired personnel will be allowed to participate for the remainder of any plan year upon reaching the qualification and eligibility requirements.

A Plan Summary Description is available through the Human Resources Department.

401(k) Plan

The Company currently provides a 401(k) Plan to all employees who have attained the age of 21 and meet the other eligibility requirements according to the plan document. Employees are automatically enrolled at a 6% contribution rate starting of the 1st day of the next month after hire. If you wish to make changes to this contribution please visit principal.com and change your elections.

Payroll deduction limits may be established or changed monthly. Investment elections may be directed daily through the use of the provider's secured web site.

A Plan Summary Description and all enrollment forms are available through the Human Resources Department or on the HR Connections Website.

CONFIDENTIALITY POLICY

PRIOR EMPLOYMENT DOCUMENTATION AND INFORMATION

As part of the Company's commitment to maintaining the highest standards of integrity and confidentiality, we have a strict policy regarding the possession and use of any documents or information from a prior employer.

You shall not, at any time, have or be in receipt of any confidential or proprietary information or documentation from any former employer in any form, whether electronic or hard copy.

This policy is in place to protect both our company and our employees from any legal or ethical issues that may arise from the unauthorized possession of such information. Ensuring compliance with this policy helps us maintain a trustworthy and secure working environment.

COMPANY DOCUMENTATION AND INFORMATION

During employment with the Company, all employees will learn and have access to Confidential Information. Confidential Information is defined below. Confidential Information is extremely important to the Company and its ability to be competitive in a highly competitive industry and to provide the best service to its clients.

All Confidential Information is and shall remain the sole and exclusive property of the Company. Employees may not use Confidential Information for any purpose other than performing their job duties for the Company, and employees may not disclose Confidential Information to any third parties without Company authorization.

Employees must return, and may not take or retain, Confidential Information at the end of their employment with the Company. Alternatively, the Company may ask employees to destroy Confidential Information in their possession.

Employees may not keep, send, or receive Confidential Information on or from unsecured personal devices or publish Confidential Information in social media.

"Confidential Information" means all information, in spoken, printed, electronic, or any other form or medium, that is used, developed or obtained by Employer in connection with its business including, without limitation, trade secrets; information, observations, and data about the Company's business affairs; business practices, plans, business development techniques or "know how"; products or services; fees, costs and pricing structures; marketing plans or strategies; customer information including customer lists, non-public customer contact information, prospective customer lists, prospective customer contact information, customer financial information, customer loan or transaction information, lender information, customer contracts, current customer requirements or preferences, and any customer information in RamQuest compiled through substantial effort and expense; market studies; designs; analyses; drawings, photographs and reports; computer software and hardware, including operating systems, applications, and program listings; flow charts, manuals and documentation; databases and data; security procedures; accounting and business methods; inventions, devices, new developments, methods, and processes, whether patentable or not and whether or not reduced to practice; customers and clients and information with respect to such persons or supplier lists; other copyrightable works; negotiations; all production methods, processes, technology, and trade secrets; all legal, tax, and accounting records of Employer; and all similar and related information in whatever form. Confidential Information also includes any information marked or identified as confidential or proprietary.

Confidential Information does not include information arising from Employee's general training, knowledge, skills, or experience; information readily ascertainable by the public; or information Employee has a right to disclose as legally protected conduct.

This policy is not intended to prohibit employees from disclosing any information they are required by law to disclose or that they have a protected right to disclose.

DRESS/HYGIENE STANDARDS

Personal appearance of employees should generally follow acceptable business-casual standards. In certain circumstances, employees may be requested to dress in professional business attire, and will be notified in advance whenever necessary.

Employees should be neat and clean at all times. Items of clothing that are not acceptable at any time include short skirts or shorts (more than 3 inches above the knee), cut-off shorts, spandex, tank tops, midriff or halter-tops, jogging suits, and ball caps.

Depending on your location, Friday may be observed as a casual day. All clothing worn should be clean, neat, and without holes or frayed areas. The supervisor will be the final arbitrator of the suitability of attire. In determining suitable dress, the supervisor may consider the amount of customer contact, safety issues and requirements, and other relevant factors.

Note: Some companies or locations may impose additional standards or have more specific guidelines which will be communicated to employees at orientation or as appropriate.

The Company will reasonably accommodate a staff member's religious beliefs in terms of workplace attire unless the accommodation creates an undue hardship. Those requesting a workplace attire accommodation based on religious beliefs should contact the HR department.

JOB RELATED TRAINING ASSISTANCE

The Company strives to support the training needs of employees to upgrade skills and improve job performance serving Company purposes. Generally, full-time employees who have completed at least ninety (90) days of service to the Company are eligible to participate in job related training assistance. Examples of such training include correspondence courses offered by Land Title Institute (LTI), software application training, or annual continuing education seminars required by regulation or those necessary to support the essential functions of the job.

Consideration for job related training is directed and determined by the immediate supervisor, placing emphasis on the performance history of the employee, and the potential benefits for both the Company and the employee. Such training must not interfere with the employee's essential job functions.

The granting of training assistance in any instance does not guarantee future assistance to any employee or for any subsequent course. Job related training requested or required by the Company will be paid for directly by the company and the cost of the training is not considered compensation to the employee.

EDUCATIONAL ASSISTANCE/TUITION REIMBURSEMENT

ET Investments and its subsidiaries (the company) support employee's efforts to continually expand their abilities and skill sets through education and training. Therefore, the company offers educational reimbursement to qualified full time employees. Full-time employees will become eligible for educational assistance after the completion of one full year of continuous, full-time employment. In addition, to be eligible for educational assistance, the employee must be performing all the requirements of his or her present position in a satisfactory manner.

The interested employee must submit a written request detailing his or her educational plans and the benefits associated with those educational plans to his or her immediate supervisor

To learn more about this program contact the Human Resources Department.

MEMBERSHIP IN PROFESSIONAL OR CIVIC ORGANIZATIONS

The Company encourages its employees to be active in professional and job related organizations.

Employees approved for membership in job related organizations may, at the discretion of the manager or department head, be paid or reimbursed dues, initiation fees, licensing fees, meeting costs, and other reasonable expenses incurred for *business reasons*.

Bar Association dues may be paid or reimbursed for attorneys for the state in which they are employed.

²**PERSONAL USE OF COMPANY EQUIPMENT**

Communication Systems

The Company's computer network, access to Internet, e-mail and voice mail systems are business tools intended for employees to use in performing their job duties. Therefore, all documents and files are the property of the Company. All information regarding access to the Company's computer resources, such as user identifications, access codes, and passwords are confidential Company information and may not be disclosed to non-Company personnel.

All computer files, documents, and software created or stored on the Company's computer systems are subject to review and inspection at any time. Employees should not assume that any such information is confidential, including e-mail either sent or received.

Computer equipment should not be removed from the Company premises without written approval from a department head. Upon separation of employment, all communication tools should be returned to the Company.

Personal Use of the Internet

Some employees need to access information through the Internet in order to do their job. Use of the Internet is for business purposes during the time employees are working. Personal use of the Internet should not be on business time, but rather before or after work or during breaks or lunch period. Regardless, the Company prohibits the display, transmittal, or downloading of material that is in violation of Company guidelines or otherwise is offensive, pornographic, obscene, profane, discriminatory, harassing, insulting, derogatory, or otherwise unlawful at any time.

Software and Copyright

The Company fully supports copyright laws. Employees may not copy or use any software, images, music, or other intellectual property (such as books or videos) unless the employee has the legal right to do so. Employees must comply with all licenses regulating the use of any software and may not disseminate or copy any such software without authorization. Employees may not use unauthorized copies of software on personal computers housed in Company facilities.

Unauthorized Use

Employees may not attempt to gain access to another employee's personal file of e-mail messages or send a message under someone else's name without the latter's express permission. Employees are strictly prohibited from using the Company communication systems in ways that management deems to be inappropriate. If you have any question whether your behavior would constitute unauthorized use, contact your immediate supervisor before engaging in such conduct.

E-mail

E-mail is to be used for business purposes. While personal e-mail is permitted, it is to be kept to a minimum. Personal e-mail should be brief and sent or received as seldom as possible. The Company prohibits the display, transmittal, or downloading of material that is offensive, pornographic, obscene, profane, discriminatory, harassing, insulting, derogatory, or otherwise unlawful at any time. No one may solicit, promote, or advertise any outside organization, product, or service through the use of e-mail or anywhere else on Company premises at any time. Management may monitor e-mail from time to time.

Employees are prohibited from unauthorized use of encryption keys or the passwords of other employees to gain access to another employee's e-mail messages.

² Suggest using MSEC sample language for computer systems.
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Voice Mail

The Company voice mail system is intended for transmitting business-related information. Although the Company does not monitor voice messages as a routine matter, the Company reserves the right to access and disclose all messages sent over the voice mail systems for any purpose. Employees must use judgment and discretion in their personal use of voice mail and must keep such use to a minimum.

Telephones/Cell Phones/Mobile Devices

Employee work hours are valuable and should be used for business. Excessive personal phone calls can significantly disrupt business operations. Employees should use their break or lunch period for personal phone calls.

Confidential information should not be discussed on a cell phone or mobile device. Phones and mobile devices with cameras should not be used in a way that violates other Company guidelines such as, but not limited to, EEO/Sexual Harassment and Confidential Information.

For safety reasons, employees should avoid the use of cell phones and mobile devices to make calls while driving. Employees must park whenever they need to use a cell phone. Generally, stopping on the shoulder of the road is not acceptable. Employees are prohibited from using a cell phone or other device to text while operating a motor vehicle. Texting is permitted only where the vehicle is at rest in a shoulder lane or lawfully parked.

The Company telephone lines should not be used for personal long distance calls.

INSPECTIONS

The Company reserves the right to conduct inspections to help maintain a safe, healthful, and efficient working environment for the benefit and protection of Company employees and to protect Company property, equipment, operations, and customers. Cooperation in the conduct of inspections is required as a condition of employment.

Employees on the Company premises may be subject to questions and searches at the Company's discretion. The Company reserves the right to inspect personal items, such as lunch pails, thermoses, purses, etc. carried by the individual employees. If you have personal items, which you would not like subjected to such inspection, do not bring these items onto Company premises. A search can also include Company property such as Company vehicles, desks, filing cabinets, and computer files, e-mail and voice mail.

A Company initiated search does not necessarily imply an accusation of theft or that an employee has broken a guideline. Employees refusing to cooperate with or submit to a search may be subject to termination.

EMPLOYMENT OF RELATIVES

The Company may consider hiring the relative of a current employee. However, the following situations are avoided:

- Where a direct or indirect supervisor or subordinate relationship exists with a family member;
- Where a relative has access to confidential information, including payroll and personnel records;
- Where a relative would be responsible to audit, verify, receive, or be entrusted with money or other sensitive information handled by the other relative.

In all cases, advance written approval of the President will be required for the hiring of a relative.

Employees who marry or become members of the same household may continue employment subject to the above requirements.

Should one of the above situations occur, the Company may attempt to find a suitable position within the organization to which one of the employees may transfer. If this is not feasible, one employee must resign within 90 days.

PERSONNEL FILES AND CHANGES IN PERSONAL DATA

The Company maintains personnel files on each employee. These files contain documentation regarding aspects of the employee's employment with the Company, such as performance appraisals, corrective interviews, and letters of commendation. Employees may review their files on an annual basis by contacting the Human Resources Department.

To ensure that your personnel file is current, notify the Human Resources Department in writing of any changes in the following:

- Your name,
- Home telephone number,
- Home address,
- Marital status,
- Number of dependents,
- Beneficiary designations,
- Education and training,
- The individual to contact in case of emergency, and
- Any other relevant information.

Basic employee information along with previous pay information can be reviewed by logging on to the HR Connections Website. Changes to basic information can also be requested via the website.

REFERENCE CHECKS

Anyone contacting the Company for a recommendation or request for information on a current or previous employee must be directed to the Human Resources Department.

Background or reference checks will be performed on new employees.

Background or reference checks may also be conducted on current employees. The Company will follow all applicable guidelines for conducting these checks including Fair Credit Reporting Act (FCRA) Guidelines.

CONFLICT OF INTEREST

Some employees will be required to complete a Conflict of Interest Affidavit annually. Disclosed conflicts will be presented to the Company's Executive Management annually to determine any potentially adverse effect on the Company. The affidavit must confirm that as a representative of the Company, the employee agrees to have no business or personal affiliations, interests, involvement in any Company, enterprise, customer, competitor, depository institution, supplier or claimant which is in actual or potential conflict with the Company or its interests which may conflict or interfere with or otherwise compromise or impair performance of duties.

SUPPLEMENTAL EMPLOYMENT

Employees should not allow supplemental employment to conflict or interfere with their daily work with the Company, compromise his/her standing or customer relationships with the Company's customers or otherwise limit, inhibit, prevent, or reduce full time efforts as a Company employee.

DISCIPLINE AND DISMISSAL

Occasionally, performance or other behavior falls short of our standards and/or expectations. When this occurs, management takes action, which, in its opinion, seems appropriate.

Disciplinary actions can range from an informal discussion with the employee about the matter to immediate discharge.

Management will decide, in its judgment, which course of action will most likely rectify the problem.

Because the Company has or has not utilized any of these actions in other instances does not set any precedent and should not be relied upon in future disciplinary situations by any employee.

PROBLEM RESOLUTION

From time to time, issues or difficulties in the work place may arise. Usually, we encourage employees to work out differences between themselves, with the expectation that the parties involved can resolve most workplace conflicts and issues. If a resolution cannot be reached, an employee with a job related concern should then contact their direct supervisor. However, if the problem involves the supervisor of the employee, or if it is not appropriate to speak with the supervisor, the employee may go directly to the next higher level of management.

If the supervisor, or next level of management, does not respond within three business days, or the employee does not feel the answer is satisfactory, the employee may go to the President or CEO or to HR. If, after following the chain of command, the employee does not feel the answer they are receiving is satisfactory, they may contact the Human Resources Department in writing. The Human Resources Department will attempt to investigate the problem, with the assistance of the President, and respond to the employee as soon as practical.

ANTI-VIOLENCE

Any action, which in management's opinion is inappropriate to the workplace, will not be tolerated. Such behaviors may include, but are not limited to, physical and/or verbal intimidating, threatening, or violent conduct, vandalism, sabotage, arson, use of weapons, and bullying. Also prohibited is the carrying of weapons onto Company property, regardless of whether the employee possesses a concealed carry permit.

Employees should immediately report any such occurrences to their supervisor or to Human Resources. We will investigate all complaints. When employees are found to have engaged in such inappropriate conduct, management will take the appropriate actions.

Employees should directly contact law enforcement, security and/or emergency services if they believe there is an imminent threat to the safety and health of themselves or co-workers.

If you are a victim of domestic violence, please contact Human Resources for assistance.

Workplace bullying is repeated mistreatment through verbal abuse, offensive conduct/behaviors and work interference. If you feel are subjected to workplace bullying please contact Human Resources.

REPORTING INJURIES

The Company is committed to a safe work environment. Employees should report any unsafe practices or conditions to their supervisor.

If employees are injured on the job, no matter how minor, they must immediately report this fact in writing to his or her immediate supervisor.

If medical treatment for an on-the-job injury is needed, it must be obtained from one of the Company's designated physicians. If not, the employee may be responsible for the cost of medical treatment.

Failure to follow safety rules may result in a reduction of Workers' Compensation benefits in the event of an injury.

EMERGENCY SITUATIONS/INCLEMENT WEATHER

In the case of an emergency, dial 911. Each office should have a designated safety coordinator who works with landlords and local officials to establish an emergency plan. Phone numbers for emergency personnel, utilities and the landlord should be posted in the employee information area of each office. Human Resources should be given a copy of these numbers in case access to the premises is restricted during an emergency. Human Resources will also have contact information on each employee in case they need to be contacted.

In Inclement weather conditions, offices are generally closed when local school districts are closed. Otherwise, please assume that they will be open for business during normal working hours. Each company may have their own procedures and notification requirements for inclement weather. Check with your local management for these procedures if they are not clearly communicated to you at orientation.

DRUGS AND ALCOHOL

Drugs and Alcohol (Testing Policy with separate stand-alone testing policy)

The Company is committed to a safe, healthy, and productive work environment for all employees, free from the effects of illegal or non-prescribed drugs and alcoholic beverages. Use of drugs and alcohol alters employee judgment resulting in increased safety risks, employee injuries, and faulty decision making. Therefore, the possession, use, sale of controlled substances or alcohol on Company premises or during Company time is prohibited. This includes working after the apparent use of marijuana, regardless of marijuana's legal status. Furthermore, working after the use of alcohol, a controlled substance or abuse of any other substance is prohibited.

Testing is an important element in the Company's efforts to ensure a safe and productive work environment. The Company has issued a separate statement for this testing program. Please refer to this separate statement, the Human Resources Department, or your supervisor if you have specific questions.

NO-SMOKING POLICY

Smoking or vaping of any kind of strictly prohibited in all of our locations.