



EMPLOYMENT MANUAL
2016

TABLE OF CONTENTS

MANUAL RECEIPT & ACKNOWLEDGEMENT (COPY)	3
102 - WELCOME AND PURPOSE	4
103 - LOCATIONS.....	4
104 - ABOUT THIS EMPLOYMENT MANUAL	4
SECTION: 200 EMPLOYMENT PRACTICES AND EXPECTATIONS	5
201 - CODE OF ETHICS	5
202 – EXPECTATIONS.....	5
203 – RIGHTS.....	6
204 – WORKPLACE PRIVACY.....	6
205 - EMPLOYEE DEFINITIONS.....	6
206 – FAIR LABOR STANDARDS ACT (FLSA) CLASSIFICATION.....	7
207 - CONFIDENTIAL INFORMATION AND COMPANY PROPERTY.....	7
208 - CONFLICT OF INTEREST	8
210 - EQUAL EMPLOYMENT OPPORTUNITY	8
211 – AFFIRMATIVE ACTION.....	9
212 - NON-DISCRIMINATION/NON-HARASSMENT	9
214 - VIOLENCE-FREE WORKPLACE	11
215 – WHISTLEBLOWING & RETALIATION	11
216 – ISSUE REPORTING.....	12
217 - ATTENDANCE.....	13
218 – REPORTING AVAILABILITY (ASSOCIATES, SECURITY OFFICERS, SCA EMPLOYEES).....	14
220 – ASSIGNMENT (ASSOCIATES, SECURITY OFFICERS, AND/OR SCA EMPLOYEES).....	14
221 - MEAL AND REST PERIODS.....	15
SECTION: 300 HIRING & DISCIPLINE	15
301- RECRUITMENT.....	15
302- DISABILITY DOCUMENTATION.....	15
303 – HIRING PROCEDURES.....	15
304 – COMPANY EQUIPMENT & KEY ISSUE.....	16
306 – PERFORMANCE REVIEWS (STAFF).....	16
307 – STATUS CHANGES.....	16
308 - I-9 IMMIGRATION REFORM POLICY.....	16
309 - BACKGROUND CHECKS.....	16
310 - DISCIPLINARY ACTION	17
311 - EMPLOYMENT TERMINATION	18
SECTION: 400 PAY & BENEFITS	19
401 – PAID TIME OFF.....	19
402 – HOLIDAYS	20
403 – MEDICAL AND DENTAL BENEFIT ELIGIBILITY.....	21
406 – LIFE, STD AND LTD BENEFITS	21
407 – HEALTH AND WELFARE FRINGE (SCA EMPLOYEES & METRO ASSOCIATES).....	21
408 – RETIREMENT SAVINGS PLANS.....	21
409 - OVERTIME PAY	22
410 - PAYROLL ADMINISTRATION	22
411 – TIME SHEETS.....	22
412 – PAY SCHEDULE & DEADLINES	22
413 – PAY DISPUTES AND CORRECTIONS	23
414 – FORMS OF PAY	23
SECTION: 500 TIME AWAY FROM WORK	23
501- REQUESTING TIME OFF	23
502- LEAVES OF ABSENCE GENERALLY	23
503 - FAMILY AND MEDICAL LEAVE.....	24
504 – CRIME VICTIMS LEAVE	24
506 – JURY DUTY	24
507 - DOMESTIC VIOLENCE LEAVE.....	25
509 - MILITARY LEAVE (USERRA)	25
510 - REST PERIODS TO EXPRESS BREAST MILK.....	25
510 - STATE SPECIFIC LEAVE PROVISIONS	25
SECTION: 600 GENERAL PRACTICES	25
601 - COMPUTER/TECHNOLOGY USE	26
602 – SOCIAL MEDIA USE	26
603 – SUSTAINABILITY & RECYCLING.....	27
605 - DRESS CODE.....	28
606 - EMPLOYMENT OF RELATIVES.....	29
608 - INCLEMENT WEATHER	29

610 – PERSONNEL FILES	29
611 – DOCUMENT RETENTION	29
612 – REFERENCE REQUESTS	29
613 - SOLICITATIONS, DISTRIBUTIONS & USE OF BULLETIN BOARDS	30
614 – MILEAGE REIMBURSEMENT	30
615 – EXPENSE REPORTS	30
616 – COMPANY CREDIT CARD	30
617 – CONTRACTS	31
SECTION: 700 EMPLOYEE SAFETY AND HEALTH	31
702 - EMERGENCY EVACUATIONS	31
704 - ON THE JOB INJURIES	31
705 - WORKERS' COMPENSATION	32
708 - SAFETY COMMITTEE	33
712 - SAFETY RULES	33
713 - ELECTRICAL SAFETY	33
714 - LIFTING	34
715 - LADDERS & STEPLADDERS	34
716 - MACHINE SAFETY	35
717 - ELECTRICAL POWERED TOOLS	35
718 - CONVEYOR SAFETY	35
719 - COMPACTOR SAFETY	35
720 - WAREHOUSE SAFETY	35
721 - LOADING DOCKS	36
722 - COMPRESSED GAS CYLINDERS – STORAGE & HANDLING	36
723 - HAND TRUCK SAFETY	36
724 - FORKLIFT SAFETY	37
725 – SECURITY SEARCHES	38
726 - DRUG-FREE WORKPLACE POLICY	39
727 – DRUG TESTING PROGRAM	39
728 - DRIVING WHILE ON COMPANY BUSINESS	42
729 – VEHICLE INCIDENTS	42
730 - SMOKE-FREE ENVIRONMENT	43
731 - WEAPONS	43
732 – WEAPONS & USE OF FORCE (SECURITY OFFICERS ONLY)	43
733 – ARRESTS (SECURITY OFFICERS ONLY)	44

EMPLOYMENT MANUAL RECEIPT & ACKNOWLEDGEMENT (COPY)

I acknowledge receipt of the **2016 (v.1) edition of the Employment Manual**. I agree to familiarize myself with this information and to abide by the contents, including the Company's policies on Equal Opportunity and Non-Discrimination/Non-Harassment which I specifically agree to follow. I understand that this manual does not form a contract between the Company and me; it is intended only as a general statement of current Company employment practices.

I also understand that the Company may change, rescind, or add to any policies, procedures, benefits, or practices described in this manual from time to time at its sole discretion, with or without prior notice to any employee.

I also understand that in the event that verbal or written communications issued before or subsequent to my receipt of this manual appear to alter the contents of this manual, the guidelines set forth herein will be considered the official position of the Company unless the manual or particular policies in it are revised in writing and such revision is authorized by a Company officer.

I understand that this manual supersedes all prior policy manuals, verbal communications, and staff meeting minutes, and/or management memos that may have been previously issued on subjects herein.

I understand that, as set forth at the beginning of this Manual and notwithstanding anything else to the contrary, I am employed "at will" with the Company. I understand that I have the right to resign my employment with the Company at any time and for any reason I choose. I further understand and agree that the Company may terminate its employment relationship with me at any time and for any reason with or without cause and with or without notice. I understand that this "at will" relationship exists notwithstanding any examples of improper conduct or other statements contained in the Employee Manual or any other statement of the Company policies or procedures. No employee other than the Chief Executive Officer ("CEO") is authorized to amend or modify these terms of employment. The CEO may make such an amendment or modification only through a document signed by that individual. I agree that these terms and conditions of employment are construed under the law of the State of Oregon without regard to its conflict of law provisions.

Date: _____

Employee Name: _____

Signature: _____

Section: 100 Introduction

102 - WELCOME AND PURPOSE

Whether you have joined us as a Security Officer, Associate, or a member of Staff, we are glad to have you as part of our team!

The DePaul Mission is to help people with disabilities have the opportunity to work.

103 - LOCATIONS

Below is a listing of all of the current DePaul Branch Offices:

Main Office

Garlington Office
4950 NE MLK Jr. Blvd.
Portland, OR 97211
503.281.1289 (Reception)
503.331.3846 (HR)

Food and Consumer Goods Packaging (FCGP)

Hayden Island (Warehouse)
2730 N. Hayden Island Drive
Building C
Portland OR 97211
503-288-6507(Reception)

Salem

4660 Portland Rd. NE
Suite 108
Salem OR 97305
503.856.9563 (Reception)

Eugene

55 East 10th Street
Eugene OR 97401
541.338.8272 (Reception)

Hermiston

80513 N Highway 395
Hermiston, OR 97838
541.289.3120 (Reception)

Baltimore

302 Crain Hwy S
Glen Burnie, MD 21061
410.582.8731 (Reception)

Boise

1406 N. Main St.
Suite 200
Meridian, ID 83642
208.780.0081(Reception)

Sierra Vista

500 E Fry Blvd #15
Sierra Vista AZ 85635
520.458.5630 (Reception)

Silverdale

9226 Bayshore Dr. NW
Suite #154
Silverdale WA 98383
360-405-1263 (Reception)

104 - ABOUT THIS EMPLOYMENT MANUAL

This manual is designed to acquaint employees with DePaul (its affiliates and subsidiary companies, collectively “the Company”) and to outline information about working conditions, benefit eligibility, and the policies affecting employment with the Company. The policy statements included in this manual may be subject to change, as the Company deems appropriate and necessary.

From time to time notice will be given regarding new or modified policies, procedures, benefits or programs. This manual outlines the guidelines and policies that apply to all Company employees. Policies and benefits that differ depending on the employee’s classification are highlighted in each section. Frequently there are references to procedures or processes that can be found on the Company Intranet. If you are an employee that does not have immediate access to the Company Intranet, please ask your supervisor or Employment Specialist for the specific information that you are looking for and it will be provided to you.

Employees must read, understand, and comply with all provisions of the manual. It describes many of the responsibilities as an employee and outlines the programs developed by the Company to benefit employees. ***This manual is not meant as a substitute for direct, regular communication between management and employees, but as a resource for employees.***

This manual is not a contract, express or implied, nor does it guarantee employment for any specific length of time. Employment with the Company is at-will. This means that either the employee or employer can terminate the employment relationship at any time, for any reason. No statements made by any supervisor or manager can alter this at-will relationship. The at-will relationship can only be changed through a signed written agreement that specifically sets forth the terms between the employee and the President/Chief Executive Officer of the Company.

Policies and procedures outlined in this manual apply when working at a customer's or the Company's site. When there is a conflict between the Company's procedures and a customer's procedures, it is important that the employee consult with their Company supervisor or Employment Specialist for clarification.

The Company's Executive Management reserves the right to full discretionary authority regarding the interpretation and application of any Company policy, guideline and/or procedure. Their decisions are considered final and binding.

THIS 2016 V.1 EDITION OF THE MANUAL SUPERSEDES ANY PRIOR ISSUED VOLUME

Section: 200 Employment Practices and Expectations

201 - CODE OF ETHICS

The Company conducts its business fairly, impartially, in an ethical and proper manner, and in compliance with all laws and regulations.

The Company is committed to conducting its business with integrity underlying all relationships, including those with customers, suppliers and communities, and among employees. The highest standards of ethical business conduct are required of Company employees in performance of their responsibilities. Employees will not engage in conduct or activity that may raise questions as to the Company's honesty, impartiality or reputation or otherwise cause embarrassment to the Company. Employees will avoid any action, whether or not specifically prohibited in the personnel policies, which might result in or reasonably be expected to create an appearance of:

- Using their position with the Company for private gain.
- Giving preferential treatment to any person or entity.
- Losing impartiality.
- Adversely affecting the confidence of the public in the integrity of the Company.

Every employee has the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with this policy. Retaliation against employees who raise genuine concerns will not be tolerated.

202 – EXPECTATIONS

The Company expects all employees to consistently:

- Embrace changes and innovation within the workplace.
- Seek new ways to collaborate and cooperate with co-workers, customers, managers and other business partners to achieve outcomes that benefit the Company and its customers.
- Communicate in a clear and transparent manner.
- Consistently execute duties and decisions in a timely and efficient manner.
- Approach all work from a customer service point-of-view and seek ways to meet the needs of both internal and external customers.
- Continually look for opportunities to improve, to acquire new knowledge and skills, and participate in workplace training opportunities.
- Act professionally at all times. Make sure that tone of voice, language, appearance, and conversations are appropriate.
- Accept responsibility for the execution of essential functions and be accountable for all actions.
- To adhere to the policies adopted by the Company.

Failure to meet these expectations or other performance expectations may result in disciplinary action, up to and including termination.

203 – RIGHTS

The Company retains the sole discretion to exercise all managerial functions, including the right:

- To dismiss, assign, supervise, and discipline employees.
- To determine and change starting times, quitting times, and shifts.
- To transfer employees within departments or into other departments and other classifications.
- To determine and change the size and qualifications of the work force.
- To determine and change methods by which its operations are to be carried out.
- To determine and change the nature, location, goods produced, services rendered, quantity, and continued operation of the business.
- To assign duties to employees in accordance with the Company's needs and requirements and to carry out all ordinary administrative and management functions.

204 – WORKPLACE PRIVACY

It is the Company's goal to respect the overall privacy of its employees and at the same time maintain a safe and secure workplace. When issues of safety and security arise, employees may be requested to cooperate with an investigation. The investigation may include the following procedures to safeguard the Company and its employees: searches of personal belongings, searches of computer/internet/email use, searches of work areas, searches of private vehicles on company premises, medical examinations, and the like. Failure to cooperate with an investigation is grounds for termination. Providing false information during any investigation may lead to discipline, including termination. Any examination, such as a medical examination, will be paid for by the company. The results of any medical examination will be maintained in confidence and provided only on a need-to-know basis. To reiterate, employees should have no expectation of privacy regarding content or activities conducted via their work-issued computer, cell phone and/or landline telephone. Similarly, there should be no expectation of privacy regarding the contents of workplace offices, desks, drawers, and or other workspaces.

205 - EMPLOYEE DEFINITIONS

There are several different classifications of employee. This classification has important impacts on benefits and other working conditions and expectations.

- **Associate** – Staffing Associates are variable-hour employees who are placed in temporary positions at client work sites to perform light industrial or administrative work. This is a 'non-exempt' role (see also the section below about **FLSA Classifications**).
- **Security Officer** – Security Officers (Officers) are variable-hour employees who are placed in temporary positions at client work sites to perform unarmed security/patrol services. This is a 'non-exempt' role (see also the section below about **FLSA Classifications**).
- **Service Contract Act (SCA) Employees** – The term "SCA Employee" refers to an Associate who is employed under a Federal Contract. Generally these are military contracts that fall under the regulations of the Service Contract Act. In instances where their employment differs from Officers and Associates, they will be referred to as SCA Employees. This is a 'non-exempt' role (see also the section below about **FLSA Classifications**).
- **Metro Associate** – 'Metro' Associates are those Associates who are placed at a client called Metro Paint in Portland Oregon. This is a 'non-exempt' role (see also the section below about **FLSA Classifications**).
- **Staff Employee** – Staff employees are the administrative and production employees who are employed in full or part-time positions with the Company to perform specific jobs to support Company operations. Staff can be either 'non-exempt' or 'exempt' depending on the position duties (see also the section below about **FLSA Classifications**).

Other general references are made to:

- **Executive Management** – the Executive or "Senior" Management team includes the President/Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO"), Chief Administrative Officer ("CAO") as well as Division Presidents, General Managers and Director-level employees.

- **Board of Directors** – the Board of Directors (“Board” or “BOD”) is comprised of outside business leaders who meet regularly to help direct the actions of the Company. The list of current members of the Board can be found on the Company website.

206 – FAIR LABOR STANDARDS ACT (FLSA) CLASSIFICATION

There are two different classifications of employee. This classification has important impacts on benefits and other working conditions and expectations. Each position is designated as either “non-exempt” or “exempt” from the “Fair Labor Standards Act” (FLSA) which governs federal and state wage and hour laws. Employees in non-exempt positions are entitled to overtime pay under the specific provisions of federal and state laws.

Exempt employees are excluded from specific provisions of federal and state wage and hour laws and are not entitled to overtime pay. Exempt employees are paid on a salary basis, which is intended to provide compensation for all hours worked for the Company. This salary will be established at the time of hire or when otherwise classified as an Exempt employee. While it may be subject to review and modification from time to time (such as during a salary review), the salary will be predetermined amount that will not be subject to deductions for variations in the quantity or quality of work performed.

However, under federal and state law, exempt salary may be subject to certain deductions. For example, salary can be reduced for the following reasons:

- Full day absences for personal reasons
- Full day absences for sickness or disability
- Full day disciplinary leave for infractions of Company policies and procedures
- Family and Medical Leave absences (either full or partial day absences) or
- To offset amounts received as payment for jury and witness fees or military pay.

Wages and salaries may also be reduced for certain types of deductions such as benefits; state, federal or local taxes; and voluntary contributions to plans such as retirement. Exempt salaries will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability (in cases where PTO has been exhausted).
- Absence on a day the worksite is closed (such as due to inclement weather) on a scheduled work day.
- Absences for jury duty, attendance as a witness, or military leave during any workweek in which work is performed.
- Any other deductions not allowed by state and federal law.

207 - CONFIDENTIAL INFORMATION AND COMPANY PROPERTY

All Company records and information relating to the Company or its customers are confidential and employees must, therefore, treat all matters accordingly. No Company or Company-related information, including without limitation, documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of the Company) may be removed from Company premises without permission from the Company. Additionally, the contents of Company's records or information otherwise obtained in regard to business may not be disclosed to anyone, except where required for a business purpose.

Employees must not disclose any confidential information, purposefully or inadvertently through casual conversation, to any unauthorized person inside or outside the Company. Employees who are unsure about the confidential nature of specific information must ask their supervisor for clarification. Employees will be subject to appropriate disciplinary action, up to and including dismissal, for knowingly or unknowingly revealing information of a confidential nature.

To protect the Company's interest in this valuable asset, employees must (a) not use any such Confidential Information for their personal benefit or for the benefit of any person or entity other than the Company, and (b) use best efforts to

limit access to such Confidential Information to those who have a need to know it for the business purposes of the Company.

In addition, employees must minimize those occasions on which documents, computer disks, thumb/usb drives, or a laptop containing such Confidential Information are taken outside the office. On those occasions where it is necessary, consistent with the best interests of the Company and performing the job effectively, to take documents, a computer disk, or a laptop containing Confidential Information outside the office, all appropriate precautionary and security measures should be taken to protect the confidentiality of the information.

During the course of employment with the Company, employees will be provided and/or will generate correspondence, memoranda, literature, reports, summaries, manuals, proposals, contracts, customer lists, prospect lists, and other documents and data concerning the business of the Company. Any and all such records and data, whether maintained in hard copy or on a computer disk, computer hard drive, computer tape, or other medium is the property of the Company, regardless of whether it is or contains Confidential Information.

Upon termination of employment at the Company, employees are required to return all such records to the Company and may not retain any copy of any such records or make any notes regarding any such records. We reserve the right to search for such information and property in personal items while on Company premises such as vehicles, purses, briefcases, etc.

208 - CONFLICT OF INTEREST

A conflict of interest generally exists in the following types of situations:

- An employee or member of his/her family has a financial interest in another company or organization and at the same time the employee has, in connection with his/her employment with the Company, dealings with or the power to influence decisions regarding that company or organization.
- The performance of an employee in his/her job is adversely affected by external involvements or employment.

Employees are expected to report conflict of interest, or the potential of a conflict of interest immediately to their supervisor. Supervisors, in conjunction with the Chief Administrative Officer, will determine if a conflict of interest exists, and the appropriate action to be taken.

Outside Employment

Outside employment is defined as any gainful occupation, or activity, whether engaged in independently or for another entity in addition to the employee's position with the Company.

Secondary employment must not be conducted from Company or customer facilities or while using Company or customer equipment or supplies. It must not be directly or indirectly for contractors, suppliers, or any other business that may be construed to be a conflict of interest with the employee's work for the Company, and it must not conflict with scheduled work hours or overtime hours when required. Employees may seek advance approval from their departmental managers before engaging in outside employment.

(Staff Only) Staff employees must not accept work with a company or individual who may compete with the Company or have the potential of becoming a customer. Employees must obtain prior approval from their supervisor before engaging in any outside employment. At no time should Staff employees of the Company engage in outside employment that might embarrass, discredit, or conflict with the interests of the Company. Any Staff employee who proposes to begin or is now engaged in outside employment must notify their supervisor. The Company may request the employee to discontinue or not accept outside employment if that employment constitutes a conflict of interest with their employment at the Company.

210 - EQUAL EMPLOYMENT OPPORTUNITY

It is the Company's policy to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, gender, religion, national origin, age, sexual orientation, veterans'

status, or disability as required by applicable federal state and local laws. It is the intent and resolve of the Company to comply with the law in all aspects of equal opportunity. This equal employment opportunity policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, transfer, training, compensation, and termination.

We are committed to assuring that:

- All recruiting, hiring, training, promotion, compensation, and other employment related programs are provided fairly to all persons on an equal opportunity basis.
- Employment decisions are based on the principles of equal opportunity. All personnel actions such as compensation, benefits, transfers, training, and participation in social and recreational programs are administered without regard to any characteristic protected by state, federal or local law.

Employees and applicants will not be subjected to harassment, intimidation, threats, retaliation, coercion or discrimination because they have exercised any right protected by law.

211 – AFFIRMATIVE ACTION

As an employer with a government contract or subcontract amounting to \$10,000 or more, we must take affirmative action to employ mentally or physically qualified disabled individuals. The Company is also required to make electronic job application systems accessible to and usable by applicants with disabilities and provide reasonable accommodation allowing disabled applicants to compete for jobs. The Office of Federal Contract Compliance (OFCCP) will review contractors' online application systems to ensure that covered contractors are providing equal opportunity to qualified individuals with disabilities and disabled veterans. OFCCP will retain any discrimination complaint filed involving the contractor's online application system and investigate the claim, rather than referring it to EEOC.

As a result of our Affirmative Action plan the Company must set goals for hiring and promoting in job categories in which women and minorities are "underutilized." The Company is required to practice nondiscrimination and take affirmative action in employment with respect to covered veterans. The affirmative action obligation requires (1) thorough, systematic efforts to prevent discrimination from occurring or to detect it and eliminate it as promptly as possible; and (2) proactive recruitment and outreach measures.

Complaints and evaluations. Records relating to complaints filed against a contractor, compliance evaluations, or enforcement actions must be retained until OFCCP makes a final disposition of the matter.

AAPs. Records of the current AAP and the one for the preceding year must be kept, unless the contractor was not required to have an AAP for the preceding year.

Identification of Record. As a compliant entity we must be able to: Identify the gender, race, and ethnicity of each employee for whom a record is kept; Identify the gender, race, and ethnicity, where possible, of each applicant; Supply this information to OFCCP upon request.

An employer may ask applicants to voluntarily provide information about gender, race, or ethnicity. This information may be used for implementation of affirmative action programs or government reporting or recordkeeping requirements. It may also be used for studies to identify and resolve possible problems in recruiting and testing members of minority groups. If this information is requested on an application, written assurance should be given that it will be maintained separately from application materials and will not be a part of the hiring process.

212 - NON-DISCRIMINATION/NON-HARASSMENT

The Company has zero tolerance regarding workplace discrimination/harassment. We are committed to providing a productive work environment, free from intimidation or harassment of any kind, including harassment from or to customers and vendors. The purpose of this policy statement is to reaffirm our commitment to equal employment opportunity and to providing a harassment-free work environment for all employees.

Harassment or discriminatory conduct of any kind, whether physical or verbal, committed by supervisors or non-supervisory personnel, is prohibited. Prevention of discriminatory activities must be practiced at all times, especially by supervisors. In those cases where discrimination can be established, disciplinary action up to and including dismissal may be taken.

Taking reprisal action against any employee because he or she has filed a discrimination or harassment complaint, furnished information or participated in any manner in an investigation, compliance review or hearing is prohibited. In those cases where reprisal action can be established, disciplinary action up to and including dismissal may be taken.

Harassment Defined. Disparate and unfair treatment of any employee or individual because of his or her gender, race, color, religion, age, disability, national origin, marital status, veteran status, sexual orientation, or any other protected class as defined by federal, state and local laws is prohibited. This includes harassment and intimidation. Harassment is behavior perceived by the receiver as unwelcome and includes, but is not limited to, the use of verbal or practical jokes, unwelcome touching, offensive remarks or put-downs, displays of objects and materials, which create an offensive environment. Actions such as these are prohibited and if repeated they are also unlawful.

Discrimination Defined. Disparate and unfair treatment of any employee or individual because of his or her race, color, sex, religion, national origin, age, disability, marital status, sexual orientation or protected group status as defined by federal, state or local laws is prohibited. This includes harassment and intimidation. Discrimination also includes treating an employee with care giving responsibilities differently based on their race, sex, disability, or other protected group status. Examples include, but are not limited to, treating male employees who are caregivers differently than female employees who are caregivers, limiting a pregnant employee's job duties based on pregnancy-related stereotypes; or denying a male employee leave to care for his child when a female employee would be granted such leave.

Complaint Process. Employees who have been subjected to, or have witnessed, unprofessional behavior, including harassment and or discrimination, are directed to immediately report such actions to their immediate supervisor, Human Resources department, department head or Executive Staff. Employees are not required to report unprofessional or harassing conduct to the individual about whom they are complaining.

Please refer to the **Issue Reporting** policy to understand the best way to make a complaint known. Upon receipt of an issue report/complaint, the Company will initiate an appropriate investigation and take any other appropriate action.

Any employee found to have engaged in unprofessional conduct, including discrimination or harassment, or found to have retaliated against an employee for making a complaint about unprofessional conduct, including discrimination or harassment, will be subject to appropriate discipline, up to and including discharge.

The Company will not take any adverse action against any employee for filing a complaint of discrimination or harassment in good faith with the Company or for participating in good faith in a discrimination or harassment investigation (see also the **Whistleblowing & Retaliation** policy).

Unprofessional conduct, including harassment of employees in connection with their work, by non-employees may also be a violation of Company policy. Any employee who experiences harassment by a non-employee, or who observes harassment of an employee by a non-employee should report such harassment to one of the individuals identified above.

Unprofessional conduct, including harassment toward our customers, vendors, suppliers or independent contractors or their employees is also strictly prohibited. Any such conduct will subject an employee to disciplinary action, up to and including immediate discharge.

Sexual Harassment. Sexual harassment is considered sex discrimination not only because of the sexual nature of the conduct to which the victim is subjected but also because the harasser treats a member or members of one sex differently from members of the opposite sex.

Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature constitutes illegal sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individuals.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an offensive work environment.

We have a zero tolerance policy however and do not condone any level of harassment.

This is by no means an exhaustive list of conduct which is considered inappropriate and which will not be tolerated in the workplace. If an employee is aware of such conduct, it is the employee's responsibility to take affirmative actions to stop it immediately either by telling the employee to stop the offensive conduct or reporting it immediately to management.

214 - VIOLENCE-FREE WORKPLACE

It is the Company's policy to provide a workplace that is safe and free from all threatening and intimidating conduct. Therefore, the Company will not tolerate violence or threats of violence of any form in the workplace, at work-related functions, or outside of work if it affects the workplace. This policy applies to the Company employees, clients, customers, guests, vendors, and persons doing business with the Company.

It will be a violation of this policy for any individual to engage in any conduct, verbal or physical, which intimidates, endangers, or creates the perception of intent to harm persons or property. Examples include but are not limited to:

- Physical assaults or threats of physical assault, whether made in person or by other means (i.e., in writing, by phone, fax, or e-mail).
- Verbal conduct that is intimidating and has the purpose or effect of threatening the health or safety of a co-worker.
- Weapons on Company property, a customer site, or at a work-related function (see also **Weapons in the Workplace** policy).
- Any other conduct or acts which management believes represents an imminent or potential danger to work place safety/security.

Anyone with questions or complaints about workplace behaviors which fall under this policy may discuss them with a supervisor, department or branch manager, or a Human Resources representative. The Company will promptly and thoroughly investigate any reported occurrences or threats of violence. Violations of this policy will result in disciplinary action, up to and including immediate termination of employees. Where appropriate and/or necessary, the Company will also take whatever legal actions are available and necessary to stop the conduct and protect the Company employees and property.

215 – WHISTLEBLOWING & RETALIATION

The Code of Ethics of the Company states that it conducts its business fairly, impartially, in an ethical and proper manner, and in compliance with all laws and regulations. (See **Code of Ethics** policy). In conjunction with this Code, it is a violation to retaliate in any manner against an employee for making a report or allegations regarding ethical or legal non-compliance.

It is the responsibility of all associates, officers, staff, board members, and volunteers to comply with the Company Code of Ethics and in good faith report any violations or suspected violations in accordance with this Whistleblower Policy.

Employees have the right to report, without suffering retaliation, any activity by the Company or an employee that the employee reasonably believes: 1) violates any state or federal law; 2) violates or amounts to noncompliance with a state or federal rule or regulation; 3) violates the Code of Ethics; 4) involves an actual or perceived conflict of interest; or 5) violates fiduciary responsibilities by a corporation or limited liability company to its shareholders, investors, or employees.

Also covered by this policy is an employee's refusal to participate in an activity that would result in a violation of state or federal statutes, or a violation or noncompliance with a state or federal rule or regulation. The Company will treat all communications under this policy in a confidential manner to the extent possible in the execution of a complete and fair investigation, utilizing as deemed necessary, its Board of Directors or outside independent professionals. The Company will not permit any negative or adverse actions to be taken against any individual for making a good faith report internally or to a public entity of a possible violation of its Code of Ethics or applicable law or against any employee or representative who in good faith assists in the investigation of a reported violation.

Examples of retaliatory behavior include (but are not limited to):

- Firing or laying off
- Blacklisting
- Demoting
- Denying overtime or promotion
- Disciplining
- Denial of benefits.
- Failure to hire or rehire
- Intimidation
- Making threats
- Reassignment affecting prospects for promotion
- Reducing pay or hours

In some instances the above actions may have a legitimate business justification. It is important to report potential retaliatory actions to the Human Resources department. An employee who retaliates against someone who has, in good faith, reported a violation or allegation, is subject to discipline up to and including termination of employment.

Employees and others may communicate suspected violations of the company **Code of Ethics**, applicable law, safety concern, or other wrongdoing by contacting their immediate supervisor and using the Issue Reporting process (see **Issue Reporting** policy). Employees may also report information regarding possible unlawful activity to an appropriate government or law enforcement agency, but are encouraged to use the internal reporting process to allow the Company to fully investigate and respond to the concern.

Employees should contact the Human Resources department, the Chief Executive Officer, or if appropriate, the Chair of its Board of Directors with any questions regarding this policy.

216 – ISSUE REPORTING

It is the Company policy that employees should have the opportunity to voice their work-related concerns. Employees are encouraged to consult with their supervisors, other members of management, and then the Human Resources department when they have a concern or question about policies or practices. The Company will consider each issue received and attempt to resolve it promptly under the guidelines of this policy.

This policy uses the term “issues” to describe an employee’s expressed dissatisfaction concerning any interpretation or application of Company policies, procedures, or rules. This also includes complaints or reports of alleged illegal or unethical behaviors. (See **Whistleblowing and Retaliation** policy).

Complaints that are presented in good faith and signed by the employee or presented in person by the employee will be reviewed and investigated. While anonymous issues will receive appropriate attention, generally these types of allegations are difficult to substantiate.

An employee should first present concerns to his or her immediate supervisor. Most problems, when openly discussed, can be resolved at this point. If the complaint involves the employee’s supervisor, or if the employee is otherwise uncomfortable presenting the complaint to his or her immediate supervisor, the employee should take the complaint to their next-tier supervisor. If the employee does not get a response within 10 business days (excluding weekends), or is not satisfied with the second-tier response, the employee may file written documentation of the complaint with their department head or the Human Resources department.

A written description of the issue should be filed with the department head or manager (see **Issue Reporting form**, attached and located on the Company Dispatch site). The employee will be contacted for additional information and will receive a timeline or other indication regarding the date by which a decision will be made. If an employee does not get a response within the stated time limitation or is not satisfied with the response, the employee may request a meeting with the Human Resources Manager or his/her designee. The meeting will be informal and will take place by telephone or in person.

The employee, supervisor, and manager/department head may present any information they deem relevant to the Human Resources representative at the meeting. The Human Resources department will try to communicate the resolution and/or decision within ten business days (excluding weekends) after the meeting.

Information concerning an employee complaint will be kept confidential to the extent practicable under the circumstances. Members of the management team responsible for the investigation and/or responding to the complaint will discuss it only with those individuals who have a need to know about the issue or who are needed to supply background information or advice.

The Company, at its discretion, may proceed with disciplinary action against an employee even if the employee has a complaint pending under this policy, as long as it is not in retaliation for the pending complaint. (See **Whistleblowing and Retaliation** policy). The Company may, at its discretion, refuse to proceed with the investigation or resolution of any complaint determined to be improper under this policy. Further, this policy does not alter the employment-at-will relationship in any way.

217 - ATTENDANCE

Regular prompt attendance is essential for efficient operations and contract compliance. Employees are expected to be at work every day, on time and to work a complete shift. Unscheduled absences, tardiness, and working incomplete shifts can create a hardship on the customer, co-workers, and the Company, and are unacceptable. Management looks at the number of unexcused absences/tardiness, and the pattern of absences/tardiness to determine what is unacceptable. All situations are dealt with on a case by case basis, but in general, ***more than one incident may lead to disciplinary action, up to and including termination of employment.***

Associates. When circumstances occur making it necessary for an Associate to be absent or late to the job, the Employment Specialist must be contacted, immediately.

- Employment Specialists begin their workday at 8:00am, Monday through Friday.
- If the Employment Specialist cannot be reached directly, employees must leave a message on their voicemail, and then contact the site supervisor at the job.
- Failure to call your Employment Specialist at least one hour prior to the employee’s scheduled start time may result in immediate termination of the assignment and possible termination of the employment relationship with the Company.

- Unless an employee is unable to communicate verbally, having a friend or family member call in the absence or tardiness is not acceptable and will not be considered proper notice.
- Notification of only the Site Supervisor is not considered proper notification under the Company Attendance policy.

Officers. When circumstances occur making it necessary to be absent or late, employees in Portland and surrounding area are expected to call the 24 hour Supervisor/Lead immediately at (503) 519-3477. In Salem, Eugene, or any future Satellite Offices employees must call their immediate DePaul Supervisor. Failure to call in 6 hours PRIOR to the scheduled reporting time, as well as excessive absenteeism and/or tardiness, may result in immediate termination of employment. Unless an employee is unable to communicate verbally, having a friend or family member call in the absence or tardiness is not acceptable and will not be considered proper notice.

Staff. Staff employees who will be absent or late for work should contact their supervisor, giving as much notice as possible. If the employee is unable to contact their supervisor directly, a message should be left on their voice mail and/or email. Unless an employee is unable to communicate verbally, having a friend or family member call in the absence or tardiness is not acceptable and will not be considered proper notice.

Employees absent more than one day, but not on an official leave of absence, must call in each day, prior to the start of their shift. Employees on an approved leave must call in on a regular basis. The Human Resources department will determine an appropriate frequency for regular call-in for approved leaves. Employees returning from an absence of three or more days may be required to provide a physician's release.

Failure to call and give notice about an absence will be considered a "no-call, no-show" and may be considered a voluntary resignation from the job resulting in termination of employment.

Failure to call in PRIOR to the scheduled start of the shift, excessive unexcused absences, no-call no show, tardiness, or incomplete shifts, will subject the employee to corrective action, up to and including immediate termination of employment. It is solely within the discretion of Company to determine what is excessive.

218 – REPORTING AVAILABILITY (ASSOCIATES, SECURITY OFFICERS, SCA EMPLOYEES)

In order to be considered for assignment, employees must provide a valid phone number where their supervisor or Employment Specialist can call to discuss available positions and/or give assignment instructions. Employees that have not worked for the Company for over 180 days will be automatically deactivated and must come into the office to be reactivated. Additionally, employees who are consistently unreachable or unavailable for assignments may be deactivated prior to the 180 days.

To be considered for any assignment, it is the employee's responsibility to call in availability. To report availability, an employee must:

- Call the number provided to you at the time of your orientation, and;
- Ask to be placed on the "Availability List."

This must be done a minimum of 2 times per week when not on assignment in order to be contacted for work.

220 – ASSIGNMENT (ASSOCIATES, SECURITY OFFICERS, and/or SCA EMPLOYEES)

When a supervisor or Employment Specialist contacts employees with a work assignment, they will be given:

- The location
- Who to report to
- The hours of the assignment
- The approximate duration of the assignment
- The essential functions of the job
- The rate of pay
- The job number
- Information regarding the acceptable dress for the work environment.

Employees must follow the rules and regulations of the customer they are assigned to. Employees are responsible for making themselves aware of the customer's policies and procedures. Should any of the customer's policies or procedures conflict with Company's, the Associates/Officers/SCA employees are instructed to address the issue with their Company supervisor immediately. Under no circumstances is the employee to discuss their concerns about a customer's policies and procedures with the customer directly.

221 - MEAL AND REST PERIODS

Rest and meal periods are provided to employees to rest and refresh themselves. It is essential that employees understand the importance of rest and meal periods and take them as scheduled.

Non-Exempt Employees. Non-exempt employees are generally (although this may vary based on state law) required to take a 10 minute paid break for every 4 hours worked or greater portion thereof, and a 30 minute unpaid meal period for every shift of 6 hours or longer. Supervisors will advise employees of the break schedule. To the extent possible, rest/meal periods will be provided in the middle of work periods. Rest/break time is counted and paid as time worked and therefore employees must not be absent from their work-stations beyond the allotted rest period time. Except in very rare situations, all non-exempt employees **MUST** take their lunch break. Willful failure to take their mandated rest/meal breaks may result in disciplinary action up to and including termination.

Exempt Employees. Exempt employees are generally expected to take an hour for lunch although there is no mandated lunch or break schedule required by law.

Section: 300 Hiring & Discipline

301- RECRUITMENT

It is the policy of the Company to ensure that all recruitment of employees comports with all applicable laws and regulations, including, but not limited to: equal employment obligations, wage and hour laws, Title VII, ADA and our Affirmative Action initiatives. It is critical that app recruitment activities follow the process flow that is outlined on the Company Intranet.

302- DISABILITY DOCUMENTATION

As a Qualified Rehabilitation Facility (QRF), the Company gives priority to placing persons with documented disabilities. Applicants will only be asked cursory information about their disabilities prior to an offer of employment. Until the post-offer documentation is verified, files will be flagged "pending"; files for those who do not have a documented disability will be flagged for "secondary" consideration. The Rehabilitation Counselor is the only authorized person to enter the disability code into TempWorks.

Sixty calendar days are allowed for verification of documentation. If documentation is not verified, after one month the hired person will be considered as a person without a disability. That status may change to priority status (has a disability) anytime documentation is received and verified.

If the person who self certifies is still with the Company after 60 calendar days and no documentation has been collected, then he or she will be counted as non-disabled. Disability Documentation should not be placed in the employee Personnel file, but rather in the Confidential file. (See the Company Dispatch site for more information on the Disability Documentation process).

303 – HIRING PROCEDURES

Because the Company is in large part a staffing entity, it is important to adhere to the required procedures. Failure to follow the required steps (as posted on the Dispatch) may be met with disciplinary action, up to and including termination. Steps include (but are not limited to), prehire screening, background checks, drug screening, disability documentation, appropriate data input into TempWorks, etc.

304 – COMPANY EQUIPMENT & KEY ISSUE

In order to assure a safe work environment, all Company keys to DePaul property will be assigned by the Safety Manager. The Safety Manager and/or Senior Management can authorize the duplication of keys.

To request a key, supervisors/manager must complete a key issue form (available on the Dispatch site). Have it signed by your manager/supervisor, route the approved form to the Safety Manager who will then issue the appropriate key(s). He/she will document the assignment of keys and forward the form to Human Resources where it will be kept in the employee's personnel file.

All keys must be returned upon separation from the Company. No keys should be distributed/loaned without approval from the Safety Manager. Any lost keys should be reported to the Safety Manager for replacement. No duplicates should be made without his/her coordination and authorization.

306 – PERFORMANCE REVIEWS (STAFF)

All Company staff will have their performance reviewed bi-annually (July and December). The Performance Evaluation process is intended to help employees and their managers celebrate successes, recognize areas for improvement, and explore pathways to overcome challenges. While compensation is not directly tied to the outcome of the Performance Evaluation, it does become part of the employee's Personnel File and will be considered in any promotional opportunities and/or future merit increases.

307 – STATUS CHANGES

Associates, Security Officers, SCA Employees. All changes to employees work status (salary, title, terms of work, etc.) must be approved by their supervisor/Employment Specialist. It is the responsibility of the supervisor/Employment Specialist to communicate these changes to Payroll/Human Resources via the **Status Change Form**.

Staff. All changes to incumbent personnel (salary, title, terms of work, etc.) must be approved via the **Status Change Form** by not only the direct supervisor but the Human Resources Manager.

308 - I-9 IMMIGRATION REFORM POLICY

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

309 - BACKGROUND CHECKS

It is Company policy to ensure that all employees and trainees are appropriately suited to the Company. To this end, all applicants for employment or training with the Company must successfully pass the required background checks prior to receiving an official offer of employment or enrollment. The Company reserves the right to make deviations from this policy, based on business need, with approval from the CEO and/or CAO.

General Guidelines

- All applicants for employment or training must sign a release authorizing their criminal background check.
- Only authorized employees will be allowed to conduct the criminal background check(s). Typically these roles are: Employment Specialists and Human Resources staff.
- Criminal background check results will be stored in a confidential file, separate from the personnel file.

Criminal Background Disqualifiers

- Any conviction for the attempt or commission of a violent crime, including (but not limited to) sex crimes (excluding prostitution), murder, or a crime that resulted in death, no matter when it occurred.
- Any conviction for the attempt or commission of an offense against a person, including (but not limited to) kidnapping, battery or assault within the seven years prior to application.

- Open or ongoing cases involving any of the above crimes will prevent an applicant or current employee from being hired or assigned, respectively.

Criminal Background Considerations. Criminal background considerations are crimes that may be directly related to the assignment and/or issues that need to be decided on a case-by-case basis. It is vitally important (and grounds for termination) if these crimes are not appropriately input into TempWorks, to prevent negligent placements with certain clients. In making the determination, consideration will be given to when the conviction occurred, the frequency and severity of the crimes, and the age of the individual at the time the crimes were committed. These include, but are not limited to:

- Any felony or misdemeanor conviction for an offense against property (including, but not limited to) theft, robbery, burglary, or money laundering within the seven years prior to application
- Prostitution or other non-violent crimes
- Any other convictions that are directly related to the job or service to which the applicant is applying.
- Open or ongoing cases involving any of the above crimes may prevent an applicant or current employee from being hired or assigned, respectively.

When considering the background of an applicant, it is not sufficient to take the applicant’s narrative of the crime, documentation must be provided before placement can be considered.

Client Preference. In the event that a client organization has a higher tolerance for criminal backgrounds, and/or additional restrictions or considerations, the Company will make placement decisions in conformity with business/contractual obligations. This will not apply to our immediate disqualifiers cited in “Criminal Background Disqualifiers” (above).

Notification. Employees are obligated to inform their direct supervisor or Employment Specialist if they are arrested or otherwise charged with the commission of a crime. Failure to do so may result in disciplinary action up to and including termination.

If during the hiring process a criminal background information is found that will eliminate the candidate from further consideration a letter will be sent to the candidate to inform them that the decision was based upon information gathered during the criminal background check, and will provide instruction on how the applicant can obtain the information (find appropriate ‘Prohibitive Background Letter’ posted on the Dispatch site under “Forms”). Please contact the Human Resources department if assistance is needed in completing this letter.

310 - DISCIPLINARY ACTION

Disciplinary actions may include verbal, written and/or final warnings, suspension, or termination. The Company reserves the right to exercise discretion in discipline. Prior disciplinary action is not a requirement before termination. If employees are disciplined it must be documented (even if ‘verbal’) and copies of the disciplinary actions will be placed in the personnel file.

The Company reserves the right to take any disciplinary action it considers appropriate, including termination, at any time. In addition to those situations discussed elsewhere in this manual, listed below are some other examples where disciplinary action could result.

Nothing in this Manual or any other Company document is intended to:

- Modify this “at-will” employment,
- Promise progressive discipline or disciplinary counseling,
- Promise notice in circumstances where the Company considers immediate termination or discipline to be appropriate.

This list is general in nature and is not intended to be all-inclusive:

- Violation of any Company policy, procedure or established process.

- Violation of the law, an established safety, fire prevention, health or security rule of the Company or customer (communicated by written, oral or demonstrated practice).
- Unsatisfactory work performance.
- Insubordination: refusing to follow the reasonable expectations and work related requests of an immediate manager or supervisor.
- Unexcused absenteeism, repeated tardiness or other violations of the Company's attendance policy.
- Job/Post abandonment (leaving early without being relieved and/or failing to directly notify a supervisor of the need to depart early. Phone messages and/or email are not considered sufficient notification).
- Malicious, false or derogatory statements or actions related to the Company, another employee or customer.
- Unauthorized use of, removal of, theft, or intentional damage to the property of the Company, a DePaul employee, an independent contractor, or a customer.
- Threatened or actual physical violence or profane or abusive language.
- Carrying any weapon or components of a weapon upon Company or customer premises without authorization from the Company, or any other violation of the Company Weapons policy.
- Use of unauthorized communications devices during work hours (computer, notebook, telephones, text messaging devices).
- Possession, sale, purchase, distribution, consumption or being under the influence or impaired by alcohol, drugs, or controlled substances on Company/Customer premises or while on Company business or any other violation of the Company drug policy.
- Refusing to submit to random drug and alcohol testing in accordance with the Company or a customer's recognized policy and procedure; or refusing to submit to or failure of a workers compensation post-accident drug and alcohol test.
- Unprofessional, discriminatory, harassing and/or abusive conduct toward the public, customer, or fellow employees.
- Failure to notify the Company of any arrest or charges filed involving the employee. The information is required to comply with customer contracts.
 - Termination decisions are not based on an arrest, without a subsequent conviction or plea of no contest. An arrest, the filing of a disorderly person or criminal complaint, or the return of an indictment against an employee for any alleged wrongful activity may result in an indefinite suspension without pay, subject to discharge depending on the particular circumstances and the offense charged.
 - All employees are obligated to cooperate with the Company by notifying their supervisor of any arrest or charges filed involving them, to provide and assist the Company in obtaining all relevant information needed to enable the Company to consider the allegation, and to provide current status information on the arrest or allegations as required by the customer.
- Providing false or misleading information on Company records including the employment application, benefit forms, time cards, expense reimbursement forms, etc.

311 - EMPLOYMENT TERMINATION

The Company is an 'at-will' employer. This means that employees join the Company voluntarily and are free to resign, at any time, with or without cause. By the same token, the Company may end the employment relationship with or without cause or notice. At no time is the employment relationship with the Company to be considered an express or implied contract of employment.

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine.

- Resignation - voluntary employment termination initiated by an employee.
- Termination - involuntary employment termination initiated by the Company.

Even though employment with the Company is at-will, the Company requests a minimum of a two-week written notice (to be given to the direct supervisor) by any employee whose intends to resign, otherwise they may be

deemed ineligible for rehire. Resignation without the benefit of advance notice may also delay receipt of their final paycheck.

If an employee leaves the Company in good standing, they may be considered for re-employment.

All benefit coverage ends at the end of the last month worked. The Company's third party COBRA administrator will initiate the appropriate notification to the former employee, to let them know about their benefit continuation rights.

Regardless of whether the separation was voluntary or involuntary, final pay will be made in accordance with applicable state wage and hour law.

Upon termination for any reason, employees must return *all* Company property in their possession immediately. Equipment must be returned *during business hours* to the office where employed. Failure to return Company-owned property will be considered *theft*, and the matter may be turned over to the police.

Staff. On the day of separation the employee must meet with the Human Resources Manager or their Department Manager to complete a termination checklist and ensure that all equipment, keys, credit cards, etc. have been returned to the Company.

All employees who separate employment from the Company will be emailed a link to participate in an online exit interview.

Section: 400 Pay & Benefits

401 – PAID TIME OFF

Below are the accrual rates and caps for the different types of DePaul Employees (Associates & Officers and Staff).

Associates and Officers

PTO Hours	Annual Accrual Max	Allowable Carry Over	Hourly Accrual Rate
40 hours	40 hours	40 hours	.033

Associates & Officers accrue PTO on an hourly basis – specifically .033 hours of PTO per hour worked. This amount will be available for use following 90 days of employment. The accrual will stop after the employee reaches 40 hours in one calendar year. Unused hours can be carried over hours into the following year, however only 40 hours can be used in a calendar year. PTO hours that are accrued but unused when an Associate or Officer terminates employment are NOT available for payout.

SCA Employees

SCA Associates have their PTO frontloaded on an annual basis, on the anniversary of their original contract date. The amount of vested PTO time is determined by the SCA Associate's length of service: 2 weeks paid vacation after 1 year of service, 3 weeks after 5 years, and 4 weeks after 15 years. At the end of the year, any remaining PTO time is cashed out and the next year's PTO is frontloaded.

Staff

Staff have a tiered PTO accrual that raises based on an employee's length of service. Each tier caps at an "Accrual Maximum" (see chart below) which caps at a relative balance until it is reduced by use. Staff will be paid out any accrued but unused PTO in their final paycheck upon termination.

Years of Service	PTO Hours	Annual Accrual Max	Maximum Vested Balance	Hourly Accrual Rate
0 – 4	120 hours	15 days	30 days	.0577

5 – 10	160 hours	20 days	40 days	.077
11+	200 hours	25 days	50 days	.096

402 – HOLIDAYS

Associates. Associates receive regular pay for working on a holiday unless otherwise governed by a contract with the customer. In Oregon if employees who have served on active duty in the Armed Forces may request to take Veteran’s Day off. Veteran’s Day is unpaid and Associates seeking the day off must make the request with at least 21 days' advance notice.

Security Officers. A Security Officer’s rate of pay for holidays is governed by the service contract with the customer. Unless specified in such contract, officers receive their straight time hourly rate if scheduled to work on a holiday. In Oregon if employees who have served on active duty in the Armed Forces may request to take Veteran’s Day off. Veteran’s Day is unpaid and Associates seeking the day off must make the request with at least 21 days' advance notice.

SCA Employees. The following is a list of holidays that are paid to all SCA Associates working under the federal contract. Any SCA Associate required to work on any of these recognized holidays will be entitled to receive their regular hourly rate for each hour worked in addition to receipt of the paid holiday.

When a holiday falls on a Saturday, the holiday will be observed the preceding Friday. Holiday time occurring on Sunday will be observed the following Monday.

- New Year’s Day January 1st
- Martin Luther King Jr. Third Monday in January
- President’s Day Third Monday in February
- Memorial Day Last Monday in May
- Independence Day July 4th
- Labor Day First Monday in September
- Columbus Day Second Monday in October
- Veterans Day November 11th
- Thanksgiving Day Last Thursday in November
- Christmas Day December 25th

Staff. Staff employees who are working in a regular full time (30 hour per work or more) are eligible for the following paid holidays:

- New Year’s Day
- Martin Luther King Jr. Day (requires Supervisor permission)
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day After Thanksgiving (requires Supervisor permission)
- Christmas Day

In Oregon if employees who have served on active duty in the Armed Forces may request to take Veteran’s Day off. Veteran’s Day is unpaid and Associates seeking the day off must make the request with at least 21 days' advance notice.

Holidays are paid to a maximum of eight (8) hours. Holiday pay is not recognized as regular hours worked for the purpose of over time calculation. Staff working schedules of less than 5 days per week receive their holiday pay based on the total number of regularly worked hours against the 5-day workweek (e.g. hours worked in a week totaling 32: divide by 5 days = 6.4 hours holiday pay.) By the same token, should a holiday fall on the employees

normally scheduled workday, then holiday pay is paid out to the maximum hours regularly worked, or eight (8) hours whichever is the lesser.

When one of the above listed holidays falls on a Sunday, the holiday will normally be observed on the following Monday. When the holiday falls on a Saturday, the holiday will normally be observed on the preceding Friday. Staff must work their scheduled workday immediately before and after the holiday (or have pre-approved time off) to receive holiday pay.

The Company is open on Martin Luther King Jr. Day and the Day after Thanksgiving, and staff may be required to work on these days. Staff who wish to take off these days must have prior approval from their supervisor. If an employee is required to work on these days, or any other holiday listed above, they will receive a floating holiday and can take a future day off on a day that is mutually agreed upon. Floating holidays must be taken by end of fiscal year or they will be lost. Floating holidays that have not been taken are not paid at time of termination of employment for any reason.

403 – MEDICAL and DENTAL BENEFIT ELIGIBILITY

Associates, Security Officers, SCA Employees. Benefit eligibility requires an Associate or Officer to work an average of 30 hours per week, calculated/evaluated on a 12-month measurement period. As Staffing Associates and Security Associates are assigned to positions with varying hours and/or customers throughout the year, they are initially evaluated for eligibility after 12 months of employment and annually each fall thereafter, and will be notified once they are eligible.

Staff. Staff employees who work an average of 30 hours per week or more are eligible for benefits on the first of the month following 60 days of employment.

Benefits for all employees must be opted into within the eligibility window noted within the paperwork or the individual will have to wait until the next enrollment period, unless a qualifying event occurs (contact Human Resources for further information).

Detailed premium information is provided at the time of hire, and can be accessed on the Dispatch Intranet site, or by request of the Human Resources department.

406 – LIFE, STD and LTD BENEFITS

Associates, Officers, & SCA Employees. The Company offers voluntary life and short-term disability insurance. The rate is variable (based on salary and other factors).

Staff. The Company pays for basic life insurance coverage. Staff employees can elect additional life coverage as well as short-term disability insurance. The premium rates are variable (based on salary and other factors).

407 – HEALTH AND WELFARE FRINGE (SCA EMPLOYEES & METRO ASSOCIATES)

SCA employees receive an additional rate of pay for every regular hour worked or PTO, and paid holiday hour taken during a pay period, calculated on a maximum of 40 hours per week. This Health and Welfare Fringe (H&W) is provided to help offset the cost of premiums associated with coverage under the Company's plans for the employee and their family members.

408 – RETIREMENT SAVINGS PLANS

It is the policy of the Company that all employees have access to various retirement savings vehicles.

Associates & SCA Employees. These employees are eligible to enroll in the Company's 403(b) Savings Account. This is an investment vehicle that employees can voluntarily contribute to via payroll deductions. Employees are immediately eligible following employment with the Company.

Security Officers and Staff. These employees are eligible to enroll in the Company's 401(k) Savings Plan. Eligibility occurs after 60 days of employment and employees can enroll on the first day of the following quarter. Employees

can defer their salary via payroll deductions into the 401(k) and the Company will match employee contributions up to 5% of the employee's gross salary. The Company match does not start until the employee's first anniversary. For more Plan details, see the Dispatch and/or contact the Human Resources department.

409 - OVERTIME PAY

The Company shall compensate all non-exempt employees time and one-half for all hours worked in excess of 40 hours each week (holiday hours, sick, PTO and other non-work hours do not count as hours worked). At times employees may be asked to work overtime to complete necessary work tasks. The employee's supervisor will notify the employee as early as possible regarding his/her scheduling needs. Employees must receive prior authorization from their supervisor, in writing, before working the overtime hours. Failure to do so may result in disciplinary action up to and including termination of employment.

410 - PAYROLL ADMINISTRATION

An Associate, Officer, or SCA employee's rate of pay may vary based on the customer contract for the position assigned. All required deductions, such as federal, state, and local taxes, and all authorized voluntary deductions, such as health insurance contributions, will be withheld automatically from the employee's paychecks.

Where applicable, every employee must complete and sign an IRS Form I-9 and W-4 on or before his or her first day on the job at the Company. These forms must be completed in accordance with federal regulations. An employee may complete a new W-4 at any time. Every employee will receive an annual Wage and Tax Statement (W-2) for the preceding year on or before January 31st.

411 – TIME SHEETS

An accurate record of all time worked by non-exempt employees is required by Federal and State laws and is necessary in order to compensate correctly for overtime. Employees will be informed on the first day on the job whether they are required to keep time by a time clock, a time sheet, or by some other method. Employees must record hours worked daily via the time keeping system they are assigned to, forwarding it weekly at the end of each week ending date to their supervisor/manager. After reviewing the submitted time and resolving any discrepancies, the supervisor will approve and forward it to Payroll for processing.

Employees must ensure that actual hours worked and leave time taken are recorded accurately. Falsifying a time sheet is grounds for disciplinary action up to and including termination and in certain instances, legal action.

412 – PAY SCHEDULE & DEADLINES

Paychecks are available for distribution on Friday (after 12pm in the branch offices, and between the hours of 8:00 a.m. and 4:00 p.m. in the Portland and Hayden Island offices). In the event a holiday falls on a payday, paychecks will be distributed the prior workday.

Associates & SCA Employees. The pay period begins on Monday at 12:01am, and ends on Sunday at 12am. Associates are paid each Friday for the hours they worked in the previous pay period. A timesheet must be accurately completed at the end of each day worked on assignment. The weekly sheet must be approved by the on-site supervisor. **Timesheets are to be turned into the office by 1:00 pm Monday.**

Security Officers. The pay period begins on Friday at 12:01am, and ends on Thursday at 12am. Officers are paid each Friday for the hours they worked in the previous pay period. (For Portland Security, if a shift starts on Thursday and ends on Friday all hours of that shift will be counted in that workweek). A timesheet must be accurately completed at the end of each day worked on assignment. The weekly sheet must be approved by their supervisor. **Timesheets are to be turned into the office by 10:00 am Friday.**

Non-Exempt Staff. In general the pay period begins on Monday at 12:01am, and ends on Sunday at 12am. Non-exempt Staff are paid each Friday for the hours they worked in the previous pay period. A timesheet must be accurately completed at the end of each day worked on assignment. The weekly sheet must be approved by their supervisor. **Timesheets are to be turned into the office by 1:00 pm Monday.**

Exempt Staff. Exempt Staff are paid on the 15th and the last day of each month. A timesheet must be submitted to Payroll three business days prior to the pay date. In the event the 15th falls on a weekend or holiday, checks will be issued on Friday.

413 – PAY DISPUTES AND CORRECTIONS

Deductions made from an employee’s paycheck are listed on the payroll check voucher, next to a detailed listing of earnings for the pay period. Pay disputes and corrections should be directed to as follows: Associates should contact their Employment Specialist, Security Officers should contact their Shift Supervisor, and Staff should contact their immediate supervisor.

414 – FORMS OF PAY

All Company employees are encouraged to sign up for direct deposit or a pay card in order to ensure their payroll is available to them on payday. With direct deposit Payroll transmits wages directly to the designated bank where they become available to the account holder payday morning. Direct deposit eliminates the worry of a paycheck not arriving by mail, and the hassle of fighting the long bank lines after work. Pay cards allow employees’ card to be funded in real time, and wages can be accessed from ATMs and/or the card can be used as a traditional debit card.

Employees who do not elect direct deposit or pay card may collect their checks at their branch office on payday, or may have their checks mailed to them. Employees must keep their address updated so that paychecks and/or wage statements arrive in a timely manner.

Employees must review their paycheck for errors. If a mistake is found it must be reported the supervisor or departmental manager immediately, who will take the necessary steps to correct the error.

Section: 500 Time Away From Work

501- REQUESTING TIME OFF

It is the policy of the Company to encourage employees to use their accrued PTO and enjoy time away from work with their families. Every effort will be made to accommodate employee requests after considering business need and the anticipated employee scheduling needs of the Company. PTO requests will be considered on a first come, first serve basis.

Associates, Security Officers, & SCA Employees. PTO requests should be submitted to their Employment Specialist or Security Shift Supervisor (as applicable) no less than two weeks prior to the onset of the requested PTO. PTO is not to be requested, nor is it approved, by the client.

Staff. Staff employees must make PTO requests as far in advance as practicable with their direct manager. If out of the office for more than one day, staff employees should notify the Front Desk and ensure that their outgoing message on their telephone as well as ‘out-of-office’ auto response is activated on their email.

502- LEAVES OF ABSENCE GENERALLY

It is the policy of the Company to abide by every law and regulation that protects an employee’s time away from work. There are *many* federal, state, and local leave provisions – more than can be accurately represented in this manual. Employees that find they have a need for time away from work must contact their supervisor and/or Employment Specialist to obtain a comprehensive list of all the applicable leaves that may apply to their situation.

- Family/medical leave
- Crime victims leave
- Maternity leave
- Bereavement leave
- Jury duty
- Military leave

- Breaks to express breast milk

503 - FAMILY AND MEDICAL LEAVE

Company will act in accordance with all state leave laws and the federal Family and Medical Leave Act (“FMLA”) regarding time off for family and medical leave of absence (“Family Leave”). Generally speaking, FMLA requires employers with 50 or more employees to provide eligible employees with unpaid leave. There are two types of leave available, including the basic 12-week leave entitlement, as well as the military family leave entitlements (Military Family Leave) described below.

Employees may be eligible for FMLA leave if they:

- Have worked for the company for at least 12 months;
- Have worked at least 1,250 hours for the company during the 12 calendar months immediately preceding the request for leave; and
- Are employed at a work site that has 50 or more employees within a 75-mile radius.

The 12 months of service need not be consecutive. Employment before a break in service of 7 years or more will not be counted, unless the break in service was caused by the employee’s USERRA-covered service obligation, or there was a written agreement that the employer intended to rehire the employee after the break in service.

Employees with any questions about their eligibility for FMLA leave should contact their supervisor/Employment Specialist and/or the Human Resources department.

504 – CRIME VICTIMS LEAVE

Employees who are the victim of a crime may be eligible for leave in order to assist in the prosecution and trial of the accused. This leave is unpaid leave. Employees taking qualifying Crime Victims Leave may choose to use PTO during this leave so the leave will be paid. In order to be eligible to take this leave, the employee must have worked for the Company at least 25 hours per week for the 180 days immediately preceding the leave. The employee must also be the victim of the crime. Employees must provide no less than three days’ notice of the intention to take leave to attend a court hearing. The employee must also provide a copy of any hearing notice to the employer prior to taking the leave.

505 – BEREAVEMENT LEAVE

Employees who have worked 500 hours are eligible to receive one day off, with pay, to attend the funeral services of a qualifying family member. Any additional time off may be covered by a specific state law but the employee may be required to use their accrued PTO. The Supervisor/Employment Specialist may require that the employee provide documentation (obituary, funeral notice or copy of a death certificate).

Qualifying family members are: legal spouse, domestic partner, child, stepchild, parent, sibling, stepparent, stepsibling, grandparent, parent in-law, aunt, uncle, sibling in-law, and grandparent in-law.

Bereavement leave is not granted to attend services for friends or neighbors, etc.

Under state law in Oregon, if certain eligibility factors are met an employee may take up to two weeks of unpaid leave off from work following the death of a covered relative. Employees who are interested in taking a bereavement leave should ask their supervisor and/or the Human Resources department.

506 – JURY DUTY

It is the position of the Company that employees should perform their civic duty when called for Jury duty. Jury duty is, however, unpaid and time off from work will require use of PTO hours.

Associates & Security Officers - The nature of the Associate’s and Security Officer’s duties makes it difficult to allow time off for jury duty. Employees who receive a summons for jury duty must immediately notify their supervisor to determine if jury duty leave can be allowed at the scheduled time. Employees may be asked to request a postponement of jury duty to a more favorable time. As with Staff employees, time away from your assignment for jury duty is unpaid.

507 - DOMESTIC VIOLENCE LEAVE

This leave is unpaid leave. Employees taking qualifying Domestic Violence Leave may choose to use accrued available PTO during this leave so the leave will be paid. In order to be eligible to take this leave, the employee must have worked for the Company at least 25 hours per week for the 180 days immediately preceding the leave. The employee must also be the victim of the domestic violence, sexual assault, or stalking (or the parent/guardian of a minor child who is a victim).

Employees must provide reasonable notice of the intention to take leave. Employees may be required to provide certification that he/she is the victim of domestic violence, sexual assault or stalking and that the leave is for one of the purposes outlined above (i.e. a police report, a protective order, or documentation from an attorney, police, counselor, clergy member, etc. that the employee or their child was undergoing treatment, counseling, or relocating as a result of domestic violence.)

Employees may be eligible for leave for the following purposes:

- To seek legal or law enforcement remedies to ensure the employee's (or their minor child's) health and safety. This includes preparing for and participating in protective order proceedings or other civil or criminal legal proceedings related to domestic violence, sexual assault or stalking.
- To seek medical treatment or to recover from injuries caused by domestic violence, sexual assault or stalking.
- To obtain counseling related to domestic violence, sexual assault or stalking.
- To obtain services from a victim services provider.
- To relocate or secure their existing home to ensure the employee's (or their child's) health and safety.

509 - MILITARY LEAVE (USERRA)

To comply with the federal Uniformed Services Employment and Reemployment Rights Act (USERRA), the Company will grant military leaves of absence to part-time and full-time regular employees who enlist for up to five (5) years of active duty in the U.S. military or who miss work because of Reserve or National Guard training or called up to active duty. If an employee is called to active military duty or to Reserve or National Guard training, or if they volunteer for the same, they should contact their supervisor/Employment Specialist and/or the Human Resources department.

510 - REST PERIODS TO EXPRESS BREAST MILK

Unpaid rest periods of not less than 30 minutes will be provided to accommodate an employee who needs to express milk for her own child 18 months of age or younger. Employees are entitled to one such rest period during each four-hour work period. Insofar as feasible, the rest period should be taken approximately midway through the four-hour work period and at the same time as the rest or meal breaks otherwise provided to the employee.

The Company will make reasonable efforts to provide a room in close proximity to the employee's regular work area to allow the employee to express milk in private, *other than a public restroom*.

An employee who intends to express milk upon returning to work is required to provide reasonable notice to the Company of her intent to do so. The Company may allow an employee to temporarily change job duties if the employee's regular job duties do not allow her to express milk.

510 - STATE SPECIFIC LEAVE PROVISIONS

There are *many* state-specific leave laws. It is incumbent upon the management of each Branch office to familiarize themselves with the various legal/regulatory nuances of their region. The Human Resources department is also a primary resource for this information.

Section: 600 General Practices

601 - COMPUTER/TECHNOLOGY USE

Computer, voice mail, e-mail and Internet availability are intended for business purposes only. Such tools and devices are to be accessed and used only in the course of carrying out legitimate job responsibilities. Personal use of Company or customer technologies is prohibited at all times.

Unacceptable non-work-related activities, including downloading, viewing, or sending insulting, disruptive, offensive, derogatory, profane, or discriminatory messages or material, are prohibited. Examples of forbidden transmissions include sexually explicit messages, cartoons, or jokes; unwelcome propositions or love letters; ethnic or racial slurs; illegal activities; violence; drugs; or any other message that can be construed to be: harmful to morale, harassment, or disparagement of others based on their sex, race, age, national origin, gender, disability, or religious beliefs.

All activities are subject to monitoring, and employees should not expect privacy regarding such use. Employees must respect copyright, trademark, trade secret, patent, license, policy and other proprietary rights and restrictions relating to the use, access, or download of software or information. Unauthorized copying of software or documentation is strictly prohibited. No Employee may download any software without the express permission of the IT Department. The Company may from time to time, conduct system audits to ensure compliance with this policy. Employees who become aware of any misuse of software or documentation must notify their supervisor or the IT department.

The E-mail system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization from Company Senior Management. Employees, if uncertain about whether certain information is copyrighted, proprietary, or otherwise inappropriate for transfer, should resolve all doubts in favor of not transferring the information and consult the IT department.

Employees are responsible for maintaining secrecy of passwords and may not share passwords with others. Employees are prohibited from using passwords to gain access to unauthorized materials.

Use of unauthorized communications devices during work hours (computer, notebook, telephones, text messaging devices) and or misuse of Company or customer's communication/information systems (including, but not limited to; computer, telephone, radio, surveillance equipment, etc.) may result in disciplinary action up to and including immediate termination of employment.

602 – SOCIAL MEDIA USE

The Company encourages employees to share information with co-workers and with those outside the Company for the purposes of gathering information, generating new ideas, and learning from the work of others. Social media provide inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, the Company has established the following guidelines for employee participation in social media.

Note: As used in this policy, "social media" refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, and YouTube among others.

Off-duty use of social media. Employees may maintain personal websites or web logs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the Company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas as long as they do not conflict with Company policies or business.

On-duty use of social media. Employees may engage in social media activity during work time provided it is directly related to their work, approved by their manager, and does not identify or reference Company clients, customers, or vendors without express permission. The Company monitors employee use of company computers and the Internet, including employee blogging and social networking activity.

Respect. Demonstrate respect for the dignity of the Company, its customers, its vendors, and its employees. A social media site is a public place, and employees should avoid inappropriate comments. For example, do not use ethnic slurs, personal insults, or obscenity, or use language that may be considered inflammatory. Even if a message is posted anonymously, it may be possible to trace it back to the sender. Employees must keep in mind that if they post information on a social media site that is in violation of Company policy and/or federal, state, or local law, any disclaimers (that the views of the employee posted on the site do not reflect the views of the Company/employer) will not shield them from disciplinary action.

Competition. Employees should not use a social media to criticize the Company's competition and should not use it to compete with the Company.

Confidentiality. Do not identify or reference Company clients, customers, or vendors without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

Please remember that new ideas related to work or the Company's business belong to the Company. Do not post them on a social media site without the Company's permission.

Legal. Employees are expected to comply with all applicable laws, including but not limited to, copyright, trademark, and harassment laws.

Trademarks and copyrights. Do not use the Company's or others' trademarks on a social media site, or reproduce the Company's or others' material without first obtaining permission.

Discipline. Violations of this policy may result in discipline up to and including immediate termination of employment.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local law to engage in protected concerted activities with other employees to improve terms and conditions of employment, such as wages and benefits.

603 – SUSTAINABILITY & RECYCLING

As part of our ongoing sustainability efforts, the Company encourages reducing, reusing, and recycling. All employees are expected to actively participate in the organization's reduction and recycling activities.

Reduction. All employees are encouraged to implement work practices that reduce waste. For example, print reports and documents on both sides of paper (set this as your print default); print only what you need, use e-mail rather than printed correspondence; and use products that are reusable, refillable, repairable, nontoxic, and recyclable. Items requiring the least possible packaging should be purchased when practical. Every effort should be made to prevent excess or unneeded materials from being purchased.

Reuse. All employees are encouraged to reuse paper whenever possible. Place all paper with print only on one side in "reusable" paper bins near printers. This paper may be used as scratch pads.

Recycling. All employees are encouraged to recycle.

- Office paper means paper that is of high quality and does not have a glossy finish including, but not limited to, computer printing paper, letterhead, ledger, and photocopy paper.
- Confidential documents may be shredded and then placed in the paper-recycling bin.
- All staples and paper clips are to be removed before any item is shredded, recycled, or placed in the reusable bin (unless specifically allowed by the vendors).
- Newspaper means newsprint-grade paper that is printed and distributed daily or weekly. Specifically excluded from this policy is soiled paper.

- Aluminum, steel, and tin cans means metal containers for items such as beverages, soup, and vegetables. Specifically excluded from this policy are foil, pie pans, and aluminum siding.
- Plastics means all #1 (i.e. clear soft drink bottles) and #2 (i.e., milk, juice, and water bottles) plastic beverage containers.

There are other materials not specifically listed in the policy that should be recycled. For example, offices should recycle toner cartridges and batteries.

605 - DRESS CODE

Employees are expected to maintain a clean, neat, and appropriate appearance at all times. It is the responsibility of direct supervisors to provide feedback and/or require correction to any employee who comes to work inappropriately dressed. Standards that must be maintained at all times:

- Clothing must be clean, unwrinkled and free of stains and/or holes
- Clothing must not be excessively tight and/or revealing
- Clothing/hair styles/make-up must be within traditionally acceptable boundaries
- Clothing must be free of words, slogans and/or messaging
- Cologne and perfume is discouraged (and prohibited in production areas)

Associates. Appropriate dress will be dictated by the specific assignment and client needs. Questions should be directed to the Employment Specialist.

Security Officers. Officers should dress in accordance with the requirements of their job assignment, obeying all safety rules that might require protected equipment to be worn. Officers must present a professional appearance at all times. (Standards may vary by customer).

- Uniforms must be worn at all times (including proper accessories as noted below)
- Hair (including facial hair), must be trimmed and neat. Hairstyles (both male and female) should be worn in a manner that will avoid safety risks, specifically: close to the head in a bun or other style that prevents it from being grabbed in a conflict.
- Excessive jewelry and/or visible body piercings and excessive visible tattoos are not permitted.
- Uniforms are to be worn only in the performance of job duties.

Employees are responsible for maintaining their assigned uniforms. Uniforms are to be laundered on a regular basis. Uniforms should be worn pressed, with shirt-tails tucked into trousers. Officers must wear a black belt, black socks and comfortable clean black shoes.

In the case of a uniform becoming badly stained or torn, the employee is responsible for securing a new one from their supervisor before reporting for their next duty assignment.

Terminating employees are expected to return their uniforms, in reasonable, good condition when collecting their final paycheck. The Company will pursue legal action (small claims court) if uniforms are not returned. Security Officers are required to wear their Company-issued name tag/access card when required by the Customer. Failure to report to work with your proper nametag/access card may result in disciplinary action being taken.

Production Staff. It is important that production employees comply with all regulatory and safety requirements. Only closed-toe shoes on the production floor. No jewelry, perfume or prohibited clothing may be worn.

Staff. In general, the dress code for staff is “business casual” except in areas that must comply with health and safety regulations. Sales roles and staff who meet with outside vendors and/or community partners are required to maintain a more formal/professional dress standard.

606 - EMPLOYMENT OF RELATIVES

Members of an employee's immediate family will be considered for employment on the basis of their qualifications. However, it is strongly discouraged if it would create a direct supervisor/subordinate relationship with a family member.

This policy must also be considered when hiring, assigning, or promoting an employee. If a circumstance arises that results in a direct supervisory relationship between immediate family or close personal relatives (e.g., marriage, reduction-in-force, reorganization, priority placement), one of the relatives may be reassigned to an appropriate vacancy or terminated. During the period that a direct supervisory relationship exists between immediate family, and close personal relatives, the supervisory relative will not be involved in any personnel action involving his/her relative. Typical first-level supervisory responsibilities will be referred to the next higher level in the supervisory chain.

For purposes of this policy, "immediate family" includes: mother, father, spouse, son, daughter, sister, brother, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, step-child, step-parent, or grandparent. This policy also applies to close personal relatives such as uncle, aunt, first cousin, nephew, niece or half-sibling.

608 - INCLEMENT WEATHER

Company offices will be closed when weather is so severe as to close public transportation and/or the CEO issues a closure notice. Employees should exercise their best judgment in determining their safety for travel in bad weather conditions. In general, unless the entire Company is closed, employees are expected to report to work. If an employee is unable to get to work due to weather conditions, and the Company is open for business, the employee must use their earned PTO if available, otherwise the time off will be unpaid. Employees are to contact their supervisor to determine Company closures, and to report their inability to report for work.

610 – PERSONNEL FILES

Employee personnel files may include the following: job application, job description, resume, records of participation in training events, salary history, records of disciplinary action and documents related to employee performance reviews, coaching, and mentoring. Full procedural detail of the contents and filing requirements can be found on the Company Intranet.

Employees are responsible for notifying supervisors and/or the Payroll and Human Resources departments when there are changes of name, address, telephone number, marital, dependent or tax status. Address change forms can be found on the Company website or can be mailed or emailed upon request.

Personnel records are kept highly confidential, and are not available to anyone outside of the Company unless an authorized release is signed by the employee and the release is to an authorized governmental agency, or is required by law. Employee access to their personnel file varies by state. To view their file, an employee must contact their Branch Manager or Human Resources department. In most cases, employee files will be kept for seven years (from date of termination) at which point the file will be destroyed.

611 – DOCUMENT RETENTION

It is the policy of the Company to retain employee personnel files for seven years, medical and workers' compensation information for 30 years after the date of termination. Comprehensive guidelines are available on the Dispatch site and/or by contacting the Human Resources department.

612 – REFERENCE REQUESTS

It is the policy of the Company to only verify external requests for a former employee's dates of employment and the job titles they held during their tenure with the Company. The Human Resources department will also verify wages for current employees, but disclosure of this information will require a signed release from the employees.

613 - SOLICITATIONS, DISTRIBUTIONS & USE OF BULLETIN BOARDS

Employees may not solicit any other employee during working time, nor may employees distribute literature in work areas at any time. Under no circumstances may an employee disturb the work of others to solicit or distribute literature to them during their working time. Persons not employed by the Company may not solicit employees for any purposes on Company premises.

Bulletin boards maintained by the Company are to be used only for posting or distributing material of the following nature:

- Notices containing matters directly concerning Company business;
- Announcements of a business nature which are equally applicable and of interest to employees.

All posted material must have authorization from the Human Resources department. All employees are expected to check these bulletin boards periodically for new and/or updated information and to follow the rules set forth in all posted notices. Employees are not to remove material from the bulletin boards.

614 – MILEAGE REIMBURSEMENT

The Company will reimburse for mileage incurred while driving an employee's own personal vehicle on the job. The Company does not reimburse for gasoline. The current rate is .575 cents per mile. The employee must have a current driver's license, meet the qualifications for insurance coverage by our carrier, maintain their own automobile insurance and their automobile must pass the minimum requirements for safety as outlined in our safety procedure manual. The Company does not pay for mileage incurred to and from the employee's home to their assigned work site.

An expense report must be submitted to your supervisor for approval along with a completed vehicle safety checklist form. Exact mileage must be documented on the mileage expense portion of the report. The Company does not accept estimates. Start and stop odometer readings must be included in report as well as detailed description of destination.

615 – EXPENSE REPORTS

An employee may at times incur expenses on behalf of the Company in the course of out-of-town travel or purchases. The process for reimbursement of any expenses incurred by employees is as follows:

- Employee must obtain approval for expenses from manager/supervisor in advance.
- Employee will complete a monthly expense report (by the 5th business day of the month following expense) and attach itemized receipts with notations of participants when/where applicable (e.g. meal reimbursements).
- Monthly expense report will then be submitted to manager/supervisor for approval/signature.
- The Company may not reimburse the employee if expense reports are habitually submitted late.
- Any missing receipts must be noted. In the instance of *repeated* receipt loss, the Company reserves the right not to reimburse.
- Employees who travel on Company business should observe the following guidelines for meal expense: Breakfast: \$10, Lunch: \$15, Dinner: \$25. (Alternative to itemization is a \$50 per day 'per diem' payment).
- Tipping is discretionary yet not to exceed 20%.

616 – COMPANY CREDIT CARD

Certain employees may be authorized to hold a Company credit card. This responsibility requires the highest level of integrity and is subject to the following rules/procedures:

- The credit card is provided for business use only. Personal use is prohibited.
- The credit card holder will be provided with a monthly statement and each charge will require itemized receipts (e.g. restaurant meal breakdown as well as list of attendees) and explanations for purchase are required.
- The statement will then be submitted to manager/supervisor for approval/signature.

- The Company reserves the right to require reimbursement from the credit card holder if credit card statements are habitually submitted late, are missing appropriate documentation, or cards are otherwise misused to the employees' benefit.

617 – CONTRACTS

Only the President/CEO is authorized to sign off on contracts committing the Company to provide services to any customer, with exception of the Food and Consumer Goods Division President, who is authorized to sign off on manufacturing contracts. To review the contract approval procedure, please see The Dispatch administrative pages. Copies of all contracts will be maintained in the shared files. In the case of contracts originating with DePaul, a temporary copy (partially executed) is to be kept in the Executive office until a fully executed copy of the contract is received and can be filed. Only the CEO is authorized to sign off on grant proposals. The CEO must approve all proposed pricing or grant proposal budgets.

Section: 700 Employee Safety and Health

702 - EMERGENCY EVACUATIONS

In the event of fire, earthquake, building collapse, or other emergency, employees must leave the building immediately. Client sites differ greatly, but generally each work area has at least two escape routes. Employees must become familiar with those routes. In the event of any emergency DO NOT USE ELEVATORS. Walk quickly, but do not run. Gather together in a group 50 feet away from the building. Do not leave the area. Employees must be present for a head count so that emergency responders do not risk their lives trying to save someone who has thought to be still inside the building. Follow the instructions of an on-site manager or supervisor. Once on the scene, the fire marshal and/or police officer holds complete authority.

Emergency evacuation drills are held periodically at Company locations. Employees must respond quickly for the drill just as in a real emergency; immediately terminate any telephone conversations, shut off machinery, turn off oxygen and acetylene cylinder valves, and leave the building. Mobility impaired persons should have a helper to assist them in reaching the safety area outside.

704 - BLOOD BORNE PATHOGENS

Exposure to blood or other body fluids from an injured person could result in infection to the exposed person. It is therefore important to utilize universal precautions to prevent exposure to any blood or body fluids from another person. The following rules need to be observed:

- First aid is to be administered only by employees who have been certified in first aid and CPR.
- Appropriate protective equipment such as latex gloves, eye shield, and facemask must be used as necessary to prevent exposure. This equipment will be found in each first aid kit.
- Spills must be disinfected before handling.
- Contaminated clothing or first aid materials must go with the injured person to the doctor's office or treatment facility for proper disposal or decontamination.
- Any person inadvertently exposed to blood or body fluids of an injured person will immediately receive a post-exposure evaluation, preferably from the attending physician of the injured worker.
- Any person, such as a diabetic, using a syringe is responsible for proper disposal at home. Sharps (syringes) are not to be discarded on Company premises.

704 - ON THE JOB INJURIES

The Company strives to provide all employees with a safe and healthy work environment. However, from time to time workplace accidents happen. **Employees must report workplace accidents or illness to the Safety Manager and/or Company supervisor immediately** regardless of how minor the accident or illness may initially appear. Failure to do so may delay subsequent benefits or jeopardize the employee's right to benefits and may be cause for disciplinary action. If the injury will require medical attention the employee should fill out all necessary accident/incident reporting forms with their supervisor/Employment Specialist before going to the doctor, when possible. If this is not possible the employee should see their supervisor/Employment Specialist immediately after

leaving the doctor's office, to fill out the necessary accident/incident paperwork. If the employee is unable to make a report, his or her manager must contact the Safety Manager and/or the Human Resources department.

705 - WORKERS' COMPENSATION

To provide for potential payment of medical expenses in the event of accidents or workplace illnesses, all employees are covered by workers' compensation (WC) insurance. Upon approval of a WC claim, this insurance benefit not only provides for payment of medical expenses resulting from a job-related injury or illness but also provides for partial payment of salary in the event of lost work time exceeding a certain number of days defined by state law.

Time missed from work due to a work-related injury or an illness may be considered a serious health condition under the Federal Family and Medical Leave Act, and/or state act, maybe chargeable against an employee's entitlement under these Acts. (See also **Family and Medical Leave Act** policy).

Employees returning to work must provide proof that they are able to complete all job-related tasks. In the event that the employee cannot complete some of the tasks as ordered by the care provider, the Company will determine if modified duty is available or if there is an available suitable alternate position. Once a physician has verified that the employee can resume all job-related tasks, he/she will no longer receive workers compensation benefits.

Employees out on time loss and employees on modified duty assignment are required to provide updated certification from their physician every two weeks or upon expiration of an existing time loss/modified duty authorization but in no instance, at more than 30 day intervals.

Failure to immediately report a work related injury and/or to provide required work restriction/time loss authorizations from the attending physician may result in disciplinary action, up to and including termination of employment. Employees who delay reporting of an on-the-job injury will be required to submit to a drug test at the time the injury is reported.

706 – MODIFIED DUTY

It is the policy of the Company to assist employees who have sustained a compensable on-the-job injury in returning to work as soon as possible. Our light/modified duty program is designed to provide these employees, who are currently unable to perform their regular job duties, with temporary work during the period of medical recovery.

- Employees eligible to participate in this program are those employees with an accepted workers' compensation claim. The injured employee will be paid at their regular hourly wage and average number of hours at the time of injury.
- The Safety Manager will coordinate the employee's participation in the light/modified duty program with the supervisor, physician, employee and insurance carrier.
- Modified duty is treated as a regular job assignment. The Company reserves the right to terminate any employee's modified duty assignment at any time for violations of Company policy, including, but not limited to, attendance, reporting to work on time, not following call-in procedures, etc.

Procedures. The Safety Manager oversees the return to work program and the supervisor/Employment Specialist is the main point of contact for their light duty worker(s). It is the supervisor's responsibility to ensure that the light duty worker has completed their paperwork/training requirements, etc. as well as any other light duty projects that may be assigned during this time frame.

The goal of the return to work program is to better educate our injured workers on workplace safety, as well as create work opportunities and projects for them that will assist other departments throughout the Company with small tasks that can be completed within the restrictions listed on the injured worker's modified job description.

Before an injured worker starts any light duty assignment for the Company, the Safety Manager and the employee's supervisor will meet to discuss the workers limitations, skills, and capabilities. They will collectively try

to get the worker into a job or function that will directly benefit the Company (examples – shredding, or if possible some position that will generate revenue within the workers restrictions).

Light duty work is to be treated as a regular job assignment. All Company policies and procedures need to be followed during the light duty assignment. Workers will be written up and disciplined for violations, such as attendance, reporting to work on time, not following call-in procedures, etc.

During each step in the above program the supervisor/Employment Specialist is to touch base with the injured worker each morning and make sure they have the task(s) for the day lined out. The supervisor is to touch base with the worker at least two more times during the day to ensure that they are staying on task.

All timesheets and medical updates for light duty workers need to go to the Safety Manager and if a light duty worker is absent for any reason that must be noted on the timesheet. Generally, workers' compensation companies do not pay time loss for appointments and they must be noted in the system and on the timesheet.

The above return to work program is a general program and all education and project assignments can vary based on the injured workers medical restrictions and capabilities.

708 - SAFETY COMMITTEE

The Company's Safety Committee meets once a month. Each department within the Company is represented. Membership consists of both supervisors and non-supervisors on an equal basis. Employees should be familiar with their Safety Committee representative. The names of the current committee members are posted on the Company Intranet. Employees should feel free to discuss any safety concerns or suggestions with their representative. These will be brought up and discussed at the monthly committee meetings.

The minutes of the meetings are posted on the Company Intranet site. The Company recognizes the importance of listening to the workers in order to maintain a safe workplace. Employee input is desired. If an employee wishes to serve on the Safety Committee, request should be made to the supervisor who will in turn notify the Safety Manager. Membership on the committee is for a minimum of one year.

712 - SAFETY RULES

The Company wants to ensure that our employees remain safe and injury-free when accidents are preventable. We expect our employees to refrain from horseplay, careless behavior and negligent actions. It is the Company's policy to maintain a safe and secure working environment for all employees and clients.

- Caution and warning signs provide important safety instructions and must be obeyed at all times.
- Work must be performed in a safe and efficient manner. Sloppy or hurried work can result in injuries to the employee and/or co-workers.
- Everyone is responsible for keeping work areas neat, clean and safe.
- Threats or violence of any kind are not tolerated in the workplace. Violence against co-workers will result in immediate termination without possibility of rehire.
- Any hazards or potentially dangerous conditions must be corrected immediately or reported to a supervisor.

Employees who fail to comply with this procedure are subject to disciplinary consequences.

713 - ELECTRICAL SAFETY

- With the exception of independently fused multi-tap cords for computers, extension cords are not allowed.
- Keep electric cords out of areas where they will be damaged by stepping on or kicking them.
- Turn electrical appliances off with the switch, not by pulling out the plug.
- Turn all appliances off before leaving for the day.
- Never run cords under rugs or other floor coverings.
- Any electrical problems should be reported immediately.

- The following areas must remain clear and unobstructed at all times: Exit doors, Aisles, Electrical panels, and Fire extinguishers.

714 - LIFTING

- Plan the move before lifting; ensure that you have an unobstructed pathway.
- Test the weight of the load before lifting by pushing the load along its resting surface.
- If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, pallet jacks and carts, or get assistance from a co-worker.
- If assistance is required to perform a lift, coordinate and communicate your movements with those of your co-worker.
- Position your feet 6 to 12 inches apart with one foot slightly in front of the other.
- Face the load; bend at the knees, not at the back; Keep your back straight.
- Get a firm grip on the object using your hands and fingers. Use handles when they are present.
- Hold the object as close to your body as possible.
- While keeping the weight of the load in your legs, stand to an erect position.
- Perform lifting movements smoothly and gradually; do not jerk the load.
- If you must change direction while lifting or carrying the load, pivot your feet and turn your entire body. Do not twist at the waist.
- Set down objects in the same manner as you picked them up, except in reverse.
- Do not lift an object from the floor to a level above your waist in one motion. Set the load down on a table or bench and then adjust your grip before lifting it higher.
- Never lift anything if your hands are greasy or wet.
- Wear protective gloves when lifting objects that have sharp corners or jagged edges.

715 - LADDERS & STEPLADDERS

- Read and follow the manufacturer's instructions label affixed to the ladder if you are unsure how to use the ladder.
- Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads, or are otherwise visibly damaged.
- Keep ladder rungs clean and free of grease. Remove buildup of material such as dirt or mud.
- Do not place ladders in a passageway or doorway without posting warning signs or cones that detour pedestrian traffic away from the ladder. Lock the doorway that you are blocking with the ladder and post signs that will detour traffic away from your work.
- Do not place a ladder at a blind corner or doorway without diverting foot traffic by blocking or roping off the area.
- Allow only one person on the ladder at a time.
- Face the ladder when climbing up or down it.
- Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down the ladder.
- When performing work from a ladder, face the ladder and do not lean backward or sideways from the ladder. Do not jump from ladders or step stools.
- Do not stand on tables, chairs, boxes or other improvised climbing devices to reach high places. Use the ladder or stepstool.
- Do not stand on the top two rungs of any ladder.
- Do not stand on a ladder that wobbles, or that leans to the left or right of center.
- When using a straight or extension ladder, extend the top of the ladder at least 3 feet above the edge of the landing.
- Secure the ladder in place by having another employee hold it if it cannot be tied to the structure.
- Do not move a rolling ladder while someone is on it.
- Do not place ladders on barrels, boxes, loose bricks, pails, concrete blocks or other unstable bases.
- Do not carry items in your hands while climbing up or down a ladder.

716 - MACHINE SAFETY

- Do not remove, alter or bypass any safety guards or devices when operating mechanical equipment such as mechanical power presses, press brakes, metal working lathes, radial arm saws, drills, horizontal mill, punch press, or when bending or forming materials.
- Replace guards, before starting the machine, after making adjustments or repairing the machine.
- Do not try to stop a work piece as it goes through any machine. If the machine becomes jammed, disconnect the power before clearing the jam.
- Do not wear loose clothing, jewelry or ties in the machine shop.
- Read and obey safety warnings posted on or near any machinery.
- Long hair must be contained under a hat or hair net, regardless of gender.

717 - ELECTRICAL POWERED TOOLS

- Do not use power equipment or tools on which you have not been trained.
- Keep power cords away from the path of drills, saws, vacuum cleaners, floor polishers, mowers, knives, and grinders.
- Do not use cords that have splices, exposed wires, or cracked or frayed ends.
- Do not carry plugged in equipment or tools with your finger on the switch.
- Do not carry equipment or tools by the cord.
- Disconnect the tool from the outlet by pulling on the plug, not the cord.
- Turn the tool off before plugging or unplugging it.
- Do not leave tools that are "On" unattended.
- Do not handle or operate electrical tools when your hands are wet or when you are standing on wet floors.
- Do not operate spark inducing tools such as grinders near containers labeled "Flammable".
- Turn off the electrical tool and unplug it from the outlet before attempting repairs or service work. Tag the tool "Out of Service".
- Do not use extension cords or other three pronged power cords that have a missing prong.
- Do not use an adapter such as a cheater plug that eliminates the ground.
- Do not run extension cords through doorways, through holes in ceilings, walls or floors.
- Do not drive over, drag, step on or place objects on a cord.
- Do not use a power hand tool while wearing wet cotton gloves or wet leather gloves.
- Never operate electrical equipment barefooted. Wear rubber-soled or insulated work boots.
- Do not operate a power hand tool or portable appliance while holding a part of the metal casing or while holding the extension cord in your hand. Hold all portable power tools by the plastic hand grips or other nonconductive areas designed for gripping purposes.

718 - CONVEYOR SAFETY

- Do not wear loose clothing or jewelry in the conveyor area.
- Do not climb over floor conveyors.
- Do not ride on any conveyors.

719 - COMPACTOR SAFETY

- Only authorized persons may operate the trash compactor.
- Open the loading door and place empty cartons and other trash into the loading chute.
- Do not load chemicals, flammable materials, or hazardous waste into the compactor.
- Check the gauge frequently in order to ascertain when the compactor is full.
- Make sure the loading door is closed and the interlocks are engaged before starting the compactor.
- When the gauge registers as full, push the start button for the trash to be compacted.
- Refer to proper lock out/tag out procedures before attempting to remove obstacles.
- Never climb inside the compactor unit.

720 - WAREHOUSE SAFETY

- When stocking shelves by hand, position the materials to be shelved slightly in front of you, so you do not have to twist when lifting and stacking materials.

- Visually inspect for sharp objects or other hazards before reaching into containers such as garbage cans, boxes, bags or sinks.
- Remove or bend nails and staples from crates before unpacking the crates.
- When cutting shrink wrap with a blade, always cut away from you and your co-workers.
- Do not try to kick objects out of pathways. Push or carry them out of the way.
- Do not let items overhang from shelves into walkways.
- Move slowly when approaching blind corners.
- Place heavier loads on the lower or middle shelves.
- Remove one object at a time from shelves.
- Place items on shelves so that they lie flat and do not wobble.

721 - LOADING DOCKS

- Keep the forklift clear of the dock edge while vehicles are backing up to the dock.
- Do not begin loading or unloading until the supply truck has come to a complete stop, the engine has been turned off, the dock lock has been engaged (if one is being used), and the wheels have been chocked.
- Do not drive the forklift into the truck until the bridge or dock plate has been attached.
- Do not drive the forklift into a truck bed or onto a trailer that has "soft" or loose decking or other unstable flooring.
- Drive straight across the bridge plates when entering or exiting the trailer.
- Use dock lights or headlights when working in a dark trailer.

722 - COMPRESSED GAS CYLINDERS – STORAGE & HANDLING

- Do not handle oxygen cylinders if your gloves are greasy or oily.
- Store all cylinders in the upright position.
- Place valve protection caps on gas cylinders that are in storage or not in use.
- Do not lift cylinders by the valve protection cap.
- Do not store compressed gas cylinders in areas where they can come in contact with chemicals labeled "Corrosive."
- Do not place cylinders against electrical panels or live electrical cords where the cylinder can become part of the circuit.
- Do not store oxygen cylinders near fuel gas cylinders such as propane or acetylene, or near combustible material such as oil or grease.
- If a cylinder is leaking around a valve or a fuse plug, move it to an outside area away from where work is performed and tag it to indicate the defect

723 - HAND TRUCK SAFETY

- When loading hand trucks, keep your feet clear of the wheels.
- Do not exceed the manufacturer's load rated capacity. Read the capacity plate on the hand truck if you are unsure.
- Place the load so that it will not slip, shift or fall. Use the straps, if they are provided, to secure the load.
- For extremely bulky or pressurized items, such as gas cylinders, strap or chain the items to the hand truck.
- Tip the load slightly forward so that the tongue of the hand truck goes under the load.
- Push the tongue of the hand truck all the way under the load that is to be moved.
- Keep the center of gravity of the load as low as possible by placing heavier objects below the lighter objects.
- Push the load so that the weight will be carried by the axle and not the handles.
- If your view is obstructed, ask a spotter to assist in guiding the load.
- Do not walk backward with the hand truck, unless going up ramps.
- When going down an incline, keep the hand truck in front of you so that it can be controlled at all times.
- Move hand trucks at a walking pace.
- Store hand trucks with the tongue under a pallet, shelf, or table.

724 - FORKLIFT SAFETY

The Company recognizes the importance of safe forklift operation throughout our facilities. Forklifts are a necessity, but pose a definite threat to the safety of our personnel and the public if operated improperly. These guidelines will reduce the risk and will also make forklift operation more productive.

Newly hired forklift operators, regardless of past experience, will be considered beginners until they have successfully demonstrated their abilities and have completed the initial training. In order to be authorized to operate a forklift, the supervisor must review the following with the prospective operator, and at the same time evaluate his or her level of skills and knowledge:

- Operating instructions, warnings, and precautions for the particular forklift(s) to be used.
- Difference between the forklift and the automobile.
- Forklift controls and instrumentation; where they are located, what they do, and how they work.
- Engine or motor operation
- Steering and maneuvering.
- Visibility including restrictions due to loading - maintaining a clear field of view in the direction of travel.
- Fork and attachment adaptation, operation, and use limitations.
- Vehicle capacity.
- Vehicle stability.
- Vehicle inspection and maintenance including how to request repairs.
- Refueling and/or recharging of batteries.
- Operating limitations.
- Composition of loads to be carried and load stability.
- Load manipulation, stacking, and unstacking.
- Pedestrian traffic and special precautions for trainees.

Annually, all forklift operators will receive refresher training and re-evaluation. Topics will include relevant subjects such as maintenance and procedures. In addition, refresher training and re-evaluation will be required when an operator:

- Has been observed to operate the forklift in an unsafe manner;
- Has been involved in an accident resulting in injury or property damage;
- Has received an evaluation revealing the operator cannot operate the forklift safely;
- Has been assigned to operate a different type of powered industrial truck; or
- The condition of the workplace has changed.
-

Operator re-evaluation will be performed annually by the Safety Manager. Insofar as practical, an obstacle course will be set up and operators required to safely maneuver through the course while performing some specific tasks. At a minimum, the re-evaluation will include:

- Vehicle inspection;
- Proper position of forks and mast while stationary and in motion;
- Keeping a clear view in line of travel;
- Proper stacking;
- Use of warning devices;
- Dismounting procedures;
- Refueling procedures; and
- Clearance from electrical panels, walkways, and fire extinguishers.

Forklift operations: Basic rules (listed below) for the safe operation of forklifts must be observed by all forklift operators

- The operator must operate the forklift in a safe manner at all times. Safety is the primary concern and production is secondary.
- Any forklift not in safe operating condition must be removed from service.
- No forklift is to be operated with a fuel leak or defective fuel line hoses or fittings.
- Forklifts will be inspected daily.

- Only trained and authorized operators will be allowed to operate any forklift.
- When the operator has dismounted from the forklift, the forks must be fully lowered to the ground, the controls placed in neutral, and the brakes fully set. If the operator is more than 25 feet away from the forklift or out of view, in addition to the above - the engine must be shut off.
- No person is allowed to stand or walk beneath the forks whether loaded or empty.
- Forklifts will not be driven up to anyone standing in front of a fixed object such as a bench or storage rack.
- The operator must slow down and sound the horn when entering or exiting the building or at other intersections or other dangerous areas.
- The operator will yield right-of-way to pedestrians and slow down when foot traffic is present.
- Forklifts will not be operated during times of heavy foot traffic.
- Under all travel conditions the forklift will be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay is not permitted.
- Only stable and safely arranged loads shall be handled. Caution will be exercised when handling off-center loads which cannot be centered.
- The forks will be placed under the load as far as possible and the mast shall be carefully tilted backward to stabilize the load.
- Tilting the forks forward with the load elevated is prohibited except when the load is over the deposit position of a tier or stack.
- When removing loads from stacks or tiers, only enough backward tilt to stabilize the load is allowed.
- Weights of loads must be under the designed load limit of the forklift.
- Only the operator is allowed on the forklift.
- When elevating personnel with the forklift, the manlift must be used. The manlift must be positively secured to the forks, the person inside the manlift must be secured with a safety harness and lanyard, the operator must attend the forklift with the engine running, and the forklift may be moved only short distances with extreme caution. When the forks must be raised or lowered the operator must operate the controls from the normal driving position.
- The driver is required to look in the direction of travel and must maintain a clear field of vision.
- Material may not be stored any closer than 18" beneath sprinkler heads and light fixtures.
- Temporarily stored material that causes a hazard must be clearly marked by a warning.
- Used lumber shall have all nails removed before stacking.
- Manual handling of lumber from stacks shall not be done from atop stacks more than one unit in height.
- Workers shall not remain or work under or near elevated loads.
- The forklift operator must look in the direction of travel and have a clear view of the path of travel.
- Wheels of vehicles being loaded shall have the brakes set. In addition, chocks must be used if necessary to prevent movement of the vehicle.
- Forklifts may not be operated near walkways during shift changes or other times of heavy foot traffic.
- The operator must immediately report problems with the forklift to the supervisor and the person responsible for repairs.
- Gloves must be used when changing propane tanks.
- Nothing may be stored within three feet of electrical control panels.
- Fire extinguishers, walkways, exits, and fire doors may not be blocked.
- Forks must be kept as low to the ground as possible while the forklift is moving. However, forks must not drag on the ground and must be high enough to clear inclines - usually 4"-6" will suffice.

725 – SECURITY SEARCHES

The Company requires each employee who handles customer product to be *randomly* searched and in addition the Company may conduct searches based upon reasonable suspicion. Designated Security Officers or management employees may search, without prior notice, employee lockers, purses, coats, and any other personal item brought on premise. Searches may also take place when employees are leaving the manufacturing area, and at such time will include a physical pat down search by either a security officer or management employee of the same gender.

Any employee refusing to allow these security searches will be subject to disciplinary action, up to and including termination. Employees found trying to leave the premises with property belonging to: the Company, another employee, vendor and/or visitor, or having such items in their possession without prior authorization, will be terminated and will not be considered for future rehire.

726 - DRUG-FREE WORKPLACE POLICY

The Company is dedicated to providing a drug-free workplace and complies with the Drug-Free Workplace Act of 1988. As a result, the Company does conduct pre-employment, post-accident, reasonable cause, and random drug testing of employees.

Use or being under the influence of alcohol (outside of work-sponsored social events) or illegal drugs at any time while on the job or representing the Company to the public will result in immediate corrective and/or disciplinary action, up to and including termination. Prohibited workplace behaviors include (but are not limited to):

- Being under the influence of alcohol or illegal drugs. Being "under the influence" means having any detectable amount of alcohol (excluding work-sponsored social events) or illegal drugs in the blood or urine, or having any noticeable impairment of mental or physical faculties while in the workplace.
- Using illegal drugs.
- The possession, transfer, purchase, sale, offering to sell or buy, manufacture, distribution, or dispensing of alcohol, of a controlled drug or related paraphernalia.

Illegal Drugs. The Company considers any drug or other substance other than a legal prescription or non-prescription medication that may affect an employee's ability to work safely and efficiently; that is defined as a "controlled substance" by the Drug-Free Workplace Act of 1988; or that is otherwise made illegal by state or federal law (i.e., Controlled Substance Act). Includes: narcotics, stimulants, sedatives, and prescription drugs that are not medically authorized or that are used inconsistently with the prescription. Marijuana, even with a prescription, is considered an illegal drug by federal law and its use is considered a violation of this policy.

Alcohol. The Company considers any intoxicating beverage/substance that has the effect of reducing motor-skills, impairing judgment, and/or reflexes and has a measurable presence on a drug and alcohol test. Includes traditional intoxicants as well as cough syrups and similar substances. All employees while employed by the Company are required to immediately notify their supervisor within five days if they are convicted of any violation of the criminal drug or DUI laws, or if they become aware that another employee has had such a conviction. The impact of such a conviction on employment with DePaul will be evaluated on a case-by-case basis, considering such factors as the employee's position and work record, the type of violation, and the potential impact on DePaul including public perception.

727 – DRUG TESTING PROGRAM

Pre-Employment. The Company requires all new hires to agree to and successfully pass a pre-employment drug screening before their employment offer is considered to be valid. Refusal to cooperate will result in the immediate disqualification for hire. The pre-employment drug test will consist of a testing for a minimum of five different controlled substance categories that include, but are not limited to, marijuana, methamphetamine, cocaine, crack, heroine, and certain prescription drugs (use without prescription may result in a 'positive' result).

Post-Accident. The Company will conduct a drug screening on any employee involved in an accident or incident on the job, regardless if physical or property damage exists as a result of the accident or incident. Every employee is required to cooperate with such drug testing. Testing positive for drug use in a post-accident test will result in immediate termination from employment, and may also result in the employee being held legally responsible for any and all property or physical damage, which the employee caused during the accident or incident.

Reasonable Cause. Whether reasonable cause exists depends on the presence of indicators that an employee uses or is under the influence of drugs or alcohol. There are many such indicators. Abnormal performance or behavior may be the result of illegal drugs or alcohol. The following are most common examples, but are not exhaustive:

- Sudden changes in work performance. This usually involves deteriorating performance, but may include occasional marked improvements in performance.

- Poor attendance, tardiness, and early departures from work.
- Unusual physical appearance, speech, odor, disorientation (e.g. inability to perform work in normal manner), or unsteady gait or balance.
- Mood swings, euphoria, drowsiness, inattentiveness, excitement, confusion, irritability, aggressiveness, or intoxicated behavior with or without odor of alcohol or drugs
- Other changes in the employee's appearance or behavior.
- Possession of alcohol, drugs, or related paraphernalia on property or during work time.
- Off duty arrest for drug or alcohol involvement may also constitute reasonable cause.

Reasonable cause may also exist when an employee (particularly one who is engaged in a potentially dangerous work assignment) is involved in an accident. Examples of potentially dangerous work include the operation of a motor vehicle and the use of machinery or other equipment that could cause serious injury. Being involved in an accident includes being responsible for the accident in whole, or in part, when another person is operating the equipment or motor vehicle.

Random Testing. All employees will be subject to periodic random drug testing while on the job. The selection procedure for a random drug will be made in a manner that is sufficiently random, primarily by lottery based on social-security number and/or by facility. Employees who are selected for a random drug test will be required to follow the established protocols required by the testing program. When an employee is notified, he or she must proceed immediately to the collection site. 'Immediately' does not mean two hours later. 'Immediately' means that after notification, all the employee's actions must lead directly to a specimen collection, to ensure the integrity of the testing process. No active employee will be excused from testing because of operational difficulties.

If an employee selected for testing is known to be unavailable due to a legitimate extended absence, long-term illness, etc., they will be notified when they return to work that they were selected for a random drug test during their leave of absence, and tested immediately.

Employees refusing to submit to random testing, or who test positive for drug use when randomly tested, will be immediately terminated from employment.

Testing Procedures. The following procedures for considering and imposing drug or alcohol testing in any given case. *Deviations from this procedure are not allowed.* If each required step cannot be completed, the employee should not be referred for a drug test.

There are several reasons for DePaul to require a drug test. Some reasons are procedural (pre-employment testing) and others are situational (post-accident, reasonable cause). Careful consideration and documentation will be made in all instances.

Pre-employment Testing. Testing occurs following a conditional job offer, but a positive result or failure to comply with testing protocols will result in the cancellation of the job offer. Applicants may re-apply after 90 days has elapsed from their initial application.

Post-accident Testing. As mentioned above, all employees involved in a workplace accident will be required to take a drug and alcohol test. The level of severity of workplace accident to require testing and/or the employees to be tested in conjunction with the accident will be determined by the supervisor, in concert with the Human Resources department and/or appropriate executive officer.

Reasonable Cause Testing. The establishment of reasonable cause is an important element in situations other than pre-employment and random drug tests;

- The supervisor or a member of the management team must determine, through personal observation, whether reasonable cause exists (see "Reasonable Cause" section, above).
- A second opinion must be sought from the executive management team (CEO, CAO, and CFO) and/or Human Resources. If unavailable, contact any other senior manager.

- Because drugs or alcohol in the body may dissipate in a few hours, such observation should be completed and confirmed by a second party as quickly as possible.

Random Testing. In order to ensure a consistently drug and alcohol-free environment, random tests are conducted periodically. The criteria for the selection of employees will vary. In some instances selection will be made through a lottery of social security numbers, in other situations it may be based on a specific facility and will include all employees therein. In all instances, careful records will be kept regarding the selection methodology and all employees included in the test.

Prior to testing, employees will need to sign consent documents. Refusal to sign the form and/or refusal to cooperate with the specimen collection procedure will result in a warning to the employee that he or she may be terminated on a presumption of intoxication. Continued refusal will result in immediate, unpaid suspension pending investigation.

If an employee admits, prior to testing, that they know they will not pass a drug and/or alcohol test, they have the option of signing a "Last Chance Agreement" whereby they agree to seek treatment for their substance abuse. They will be on 'suspended' status during this time and after 90 days and completion of their program, they may be reinstated to work. Requirements include (and are not limited to): proof of treatment, negative drug/alcohol test, and consent to periodic testing for the next six months.

Following the signing of appropriate consent documents, the employee must be escorted to either the onsite testing facility or a designated, independent testing facility.

If a positive result requires secondary verification or analysis by an independent medical facility, employee should be escorted to the lab or test facility and not allowed to drive a vehicle, as they may be impaired.

Upon being notified of their selection in a random drug test, or of the need for a post-accident or reasonable cause drug test, the employee must remain in sight of the testing facilitator or other DePaul manager or supervisor, until testing is complete.

Actual testing protocols may vary based on location, but will comport with best-practice standards to ensure that the process is discreet and that tests are accurate.

After the test is completed with a positive result, or the employee or applicant has refused to consent or cooperate, this may be an indication that he or she is not sufficiently sober to drive a motor vehicle. In such situation, the employee or applicant should be discouraged from driving. Other transportation should be arranged, such as cab, bus, friend of the employee or applicant or the employee's emergency contact. If the employee insists upon driving and is suspected of being impaired by illegal drugs or alcohol, they must be warned that the police will be notified and given the identity of the car and license plate number. If the employee or applicant drives away, contact the authorities.

The employee is considered to be on paid suspension from the time of leaving work for the lab or testing facility, until the results of the tests are received. Provided the testing occurs immediately, and the test results are negative, the employee is returned to work without loss of pay or record of suspension.

If an initial drug test results in a non-negative result, an applicant has the option of pursuing independent testing at an off-site, qualified testing facility. Employees who test non-negative will be required to resolve the ambiguity by re-testing at an off-site facility. The employee's employment status will be provisionally terminated, unless the test is confirmed 'negative' at which point the employee will be returned to work without loss of pay or record of suspension or termination.

The employee's test results and the fact that a test was performed will be disclosed only to those personnel who have a need to know. Documentation will be kept in a separate, medical-only file for the employee marked "Confidential" and protected from disclosure to unauthorized personnel.

Positive test results will be considered together with medical and other evidence to determine whether any personnel action is to be taken.

All questions regarding this or any other company policy should be directed to the Human Resources department.

728 - DRIVING WHILE ON COMPANY BUSINESS

Driver inattention is a factor in a majority of motor vehicle accidents. We are not only concerned about employee welfare, but also the welfare of others who could be put in harm's way by inattentive driving. As a driver, the primary responsibility is to pay attention to the road. When driving on the Company business, or driving while conducting business on behalf of the Company in any other manner, state law is the controlling factor but the following applies:

Cellular Phone Use. Cell phone use while driving is a common, often harmful, distraction. We are concerned about employee safety as well as the safety of others. For this reason, the use of cell phones while driving is strongly discouraged. Employees must not accept or place calls unless it is an emergency, meaning the call cannot wait until the employee can safely pull off the road or arrive at the destination. If an employee must use a cell phone while driving, please use good judgment: keep the call short, use a hands-free device as required by state law, get to know the phone and its features, and suspend conversations during hazardous driving conditions (rain, snow, ice, fog, glare, heavy traffic, etc.).

Obey the Law. The Company is not responsible for any moving traffic violations, parking tickets, or any other city ordinances or state/federal laws regarding employee driving habits and operation/care of the employee's personal motor vehicle. Any tickets issued are the employee's responsibility, even if the ticket is issued while conducting business for the Company.

Other Safe Driving Precautions. Employees must use sound judgment when road conditions are poor. Limit or avoid driving when rain or snow conditions threaten safety.

- Employees must make an effort to avoid distractions such as eating, applying makeup, paying too much attention to vehicle music/entertainment controls, or other distracting behavior.
- Employee should not drive if the ability to drive safely is impaired by the influence of medications.
- Laptop computers should never be used at any time while driving.
- If an employee is using a vehicle not their own (rental or otherwise) mirrors should be adjusted appropriately and the vehicle's controls should be studied before operating.
- Employees should be concerned for coworker safety. Employees who are driving when a call comes in should refrain from answering or should request that the caller wait until the driver can call back.
- Employees who drive for Company business must have a current, valid driver's license.

729 – VEHICLE INCIDENTS

When one of the Company's vehicles has been involved in an incident, immediate action must be taken to notify the proper people and to follow through with our driver. This applies even if there has been no apparent vehicle damage, but there has been an injury to our driver or others or if there has been property damage.

The responsibility lies with the immediate supervisor of the individual involved with the accident. In the event that no individual is involved, it is the responsibility of the supervisor responsible for the property involved. The driver of the vehicle is to obtain pertinent information from all people involved in the accident, from any witnesses and any police officers present.

- The employee must immediately notify his/her supervisor - at home if necessary.
- The incident must be reported immediately by the responsible supervisor to one of the following people: Chief Administrative Officer (CAO) or the Chief Executive Officer (CEO). These are the only individuals authorized to report the incident to our insurance broker. They will require a copy of all completed paperwork.

- The supervisor will ensure the driver is given a urinalysis per our drug and alcohol policy. This may be accomplished at a medical facility, collection facility, or at one of our own facilities as long as it is administered by a person authorized to perform such tests. The test must be administered as soon as possible following the incident; in all cases before the driver receives medication of any kind or is allowed to go home.
- The driver must fill out a Vehicle Accident Report within twenty-four hours if the incident or accident falls within the state requirements (if there is any doubt, a report will be filled out). The report must be detailed and legible. If there is no state requirement for submitting a Vehicle Accident Report, a detailed incident report will be made by the driver and any passengers within the vehicle. The incident must also be reported to the Safety Manager, who will require a copy of all completed paperwork.
- If the employee has sustained injuries a completed Injured Worker packet must be submitted. The incident must be reported to the Safety Manager.

The Safety Manager will report all details to the CEO and/or CAO. The insurance broker will be offered an opportunity to inspect any damaged vehicles before repairs are begun.

730 - SMOKE-FREE ENVIRONMENT

Smoking is not permitted at any time on Company property except in designated smoking areas. This includes all forms of smoking, including e-cigarettes. Smokers should be considerate of coworkers, customers, and members of the public and refrain from smoking on neighboring businesses properties as well. Help to maintain a clean workplace by depositing cigarettes in appropriate containers. Employees who smoke must observe the same guidelines as non-smokers for the frequency and length of break periods.

Security Officers. Security Officers are only allowed to use tobacco products while on break time (off-duty) and such use is limited to the designated areas specified by the customer for this purpose. Officers shall not smoke while conducting foot patrols and shall be cognizant of fire danger and littering. Patrol Officers are not allowed to use tobacco products while operating Company vehicles.

Security Officers who use tobacco products are expected to be considerate of persons around them who do not. The Officer is to make every effort to minimize the after effects such as smoke odor on their clothing and breath, in Company issued vehicles, and any other publicly visited common areas they come in contact with.

731 - WEAPONS

Except for law enforcement officers (police, sheriffs, etc.) the Company prohibits all persons who enter Company property or premises or who attend any Company sponsored function or event from carrying firearms or other dangerous weapons of any kind, regardless of whether the person is licensed to carry the weapon.

Prohibited weapons include, without limitation: weapons or explosives that are restricted by local, state or federal law. (Legal, chemical dispensing devices such as pepper sprays that are sold commercially for personal protection are not covered by this policy).

If an employee has questions about this policy they must contact their supervisor, Employment Specialist or the Human Resources department for clarification. Employees will be held responsible for making sure beforehand that any potentially covered item they possess is not prohibited by this policy.

732 – WEAPONS & USE OF FORCE (SECURITY OFFICERS ONLY)

The primary obligation of all Security Officers is to observe incidents that are criminal or safety concerns and report them to the proper response authorities. Officers will not possess upon their person or at their workplace any object that is commonly construed as a weapon. Examples of this include, but are not limited to: firearms, striking devices, incapacitating sprays or foams, pressure point devices, stun devices or any object by its preparation, appearance or presentation is an obvious weapon. No handcuffs or flex cuffs or similar restraints shall be carried or used by the security officer. No component of a weapon shall be carried to include ammunition or component of ammunition. Violation of this rule will result in immediate termination of employment.

Use of Force. A DePaul Industries Security Officer may *only* use physical force in the following circumstances:

- When the officer is being assaulted or reasonably believes they are about to be assaulted, or
- When the officer is witnessing another person being assaulted and it appears reasonable that serious physical injury could result.
 - Serious Physical Injury is defined by the Criminal Code as: means physical injury which creates a substantial risk of death or which causes serious and protracted disfigurement, protracted impairment of health or protracted loss or impairment of the function of any bodily organ.

Only the minimal amount of force necessary to control the situation is to be used by the Security Officer. Once the threat has been eliminated, all use of force will be stopped.

733 – ARRESTS (SECURITY OFFICERS ONLY)

Security Officers are not authorized to make an arrest while functioning under the contract obligations of the site. If an employee chooses to make a citizen's arrest for witnessed criminal conduct, the officer is acting as a private citizen and not as an agent of the Company. The officer, acting as a private citizen, in making the arrest, should have familiarity with relevant state laws, e.g. ORS 133.220 and 133.225

Who may make arrest? An arrest may be effected by:

- (1) A peace officer under a warrant;
- (2) A peace officer without a warrant;
- (3) A parole and probation officer under a warrant as provided in ORS 133.239;
- (4) A parole and probation officer without a warrant for violations of conditions of probation, parole or post-prison supervision;
- (5) A private person; or
- (6) A federal officer.

Arrest by private person. (1) A private person may arrest another person for any crime committed in the presence of the private person if the private person has probable cause to believe the arrested person committed the crime. A private person making such an arrest shall, without unnecessary delay, take the arrested person before a magistrate or deliver the arrested person to a peace officer.

- (2) In order to make the arrest a private person may use physical force as is justifiable under ORS 161.255. [1973 c.836 §74]

It is imperative that employees understand that a citizen's arrest falls entirely upon the citizen and that the officer does not assume the arrest but only facilitates a lawful arrest into the judicial system.

Security Officers shall be authorized, by law, to assist any law enforcement officer, who issues a lawful order to assist them in making an arrest or in lawfully fulfilling a public safety function. If this assistance is lawfully performed upon the contract site, then the Security Officer is operating on behalf of the Company. If this assistance is performed off site, then the Security Officer is acting as a private citizen and not as an agent for the Company.