



EMPLOYEE HANDBOOK

(A Guideline for Success)

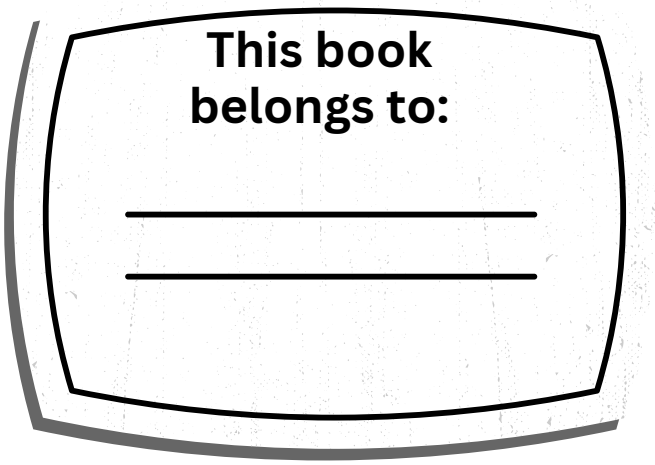
NGP MANAGEMENT

NGP

EMPLOYEE MANUAL

MARCH 2024



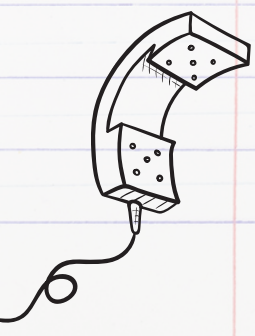

This book
belongs to:

Important Contacts

Corporate Office Main Number: (978) 898-1200
Director of Human Resources: (978) 898-1228
All HR related inquiries: (978) 898-1201
↳ Follow the prompts for the department you would like to reach.
Director of Compliance and Safety: (978) 898-1361
Asset Protection: (978) 898-1360
Payroll Department: Give your Payroll Representative a call directly or contact the main number for help.

Other Contact Info I Want to Save...

NAME	NUMBER



Updated March 13, 2024

Welcome!

Welcome to NGP Management, our Dunkin' franchise, owned and operated by the Scrivanos Family! Since our start in 1985, we have been proud to be a part of communities throughout New England and we are glad that you have decided to join us on this journey. Our goal has always been to provide great service to our customers and employees through a positive, clean, friendly and fulfilling environment. Regardless of how long you spend with us (and we hope it's a long time!), we hope that you find it as rewarding as we do and are proud to say that you are part of the Scrivanos family!



How to use this book:

Please read this Handbook carefully. It is designed to make you feel at home in your new job, as well as provide you with some necessary information. Reviewing it from time to time will help you make the most of your experience with us. If, at any time, you have questions concerning the Handbook or concerns about correct procedures, we encourage you to discuss them with a member of your Management Team or Human Resources. As you read though this Handbook, you will find many reasons for our success. But no single factor is more important than the dedication and effort of our employees.

Others in the industry may try to copy our methods, but they can't duplicate our pride, enthusiasm, and dedication to this business. The NGP spirit is exclusively ours and yours!



To do:

- ☑ Use this book as a resource to help answer my questions.
- ☑ Use this book as a resource to help answer other people's questions

What are our core values?

GROWTH

We encourage a healthy competitiveness. We always want to strive for growth, reject complacency and keep looking for opportunities to get to the next level.

RELATIONSHIPS

We are a family run business that values integrity, loyalty and commitment. Building strong relationships is at the heart of everything we do.

DOING WHAT'S RIGHT

We always strive to do the right thing. Our decisions are based on what is best for our employees and the business.

CARING

We want to be known as an organization that cares about its employees, business and communities. Our goal is to build teams that care about doing the right thing.

What do they mean?

WE ARE ACCOUNTABLE

To keep getting better

To seek feedback and learn from our mistakes

To the business and each other

To do the right thing

YOU MATTER

To the business

To our guest

To each other

WE DO WHAT IS RIGHT

Even if it is not the easy option

When we are making decisions

When we communicate

When we interact with each other

WE CARE

About being kind to each other and our guests

About doing a good job

About our business

About the community

About being inclusive and respectful

How can you support our values?

AS CREW

- You make our guests your number one priority through exceptional service and quality.
- You are proud to be part of a team and strive to be a team player.
- You are honest and have integrity with everything you do.
- You show up to be your best everyday.
- You create happiness in every guest interaction and make the guest's day better on every shift you work.
- You listen to feedback with an open mind.

AS LEADERS

- You care about our stores and make them the best they can be for employees and guests.
- You guide people in the best direction for themselves and the business.
- You help your teams to feel fulfilled and cared for everyday.
- You lead by example.
- You develop, mentor and pursue our future leaders.
- You strive to always be consistent, fair and ethical in all that you do.

AS THE SUPPORT TEAM

- You support, assist and create new ways to elevate the work of the field.
- You know that store success = your success and it is only together that we continue to grow.
- You believe in and strive to execute the policies and procedures that have been carefully adopted to help the team!

We are all part of one NGP team, working together on a daily basis.

How our values show up everyday

We asked our employees how they see our values showing up on a daily basis and here is what they said:



GROWTH

"I started in 1997 as a Crew member and now I am training new managers as they start their careers with us!" - Magda, tenure 26 years

"I have learned that if you work hard, are loyal and patient, NGP will spare nothing on your development. They will invest in you." - Melissa , tenure 19 years



DOING WHAT'S RIGHT

We provided training classes to keep up with the changing social climate the world is experiencing. Although our stores are busy and it is hard to step away, we prioritize these trainings so that our teams are equipped to always do the right thing.

"We had a member of our management team going through personal issues and they stopped showing up to work. Instead of giving up on them, we continued to reach out and sought help to make sure they were ok." - Lynne



RELATIONSHIPS

"I have an employee who has worked with us for a while. He has a loyal customer at his store whose father passed away. Our employee organized a fundraiser to support this guest and help fund some of the funeral costs." - Simon

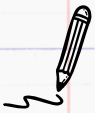
"I had a guest at one of my stores come in one day and say 'I couldn't wait to see you and tell you about the birth of my Grandson'!" - Ruben



CARING

In Manchester, we hired four men who had recently been forced to move to the United States from Afghanistan due to turmoil in their country. They started working with us but did not have transportation to and from work, so the team organized a donation of bikes to help.

We partner with different homeless and women's shelters to donate our donuts at the end of the day so that they don't get thrown away and go to those in need.



How do you see our values showing up for you?

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The Important Stuff

These policies and procedures will help you be successful on your career journey.



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HOW TO MAKE THIS BOOK AS USEFUL AS POSSIBLE:

- ☑ Grab a highlighter to highlight the stuff you want to remember
- ☑ Use the note pages to write down your thoughts
- ☑ Mark the pages you think you'll use the most often
- ☑ Take this book with you daily to answer any questions that may arise

Employment-at-Will

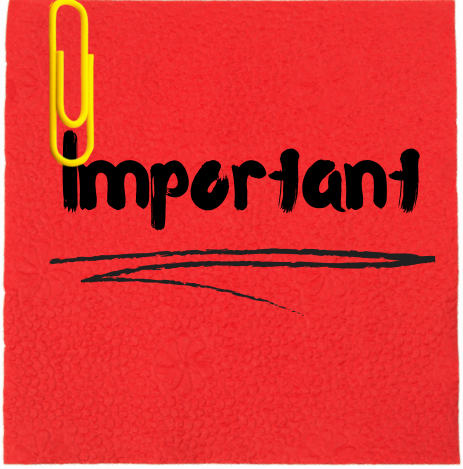
Employment at our Dunkin' Franchise (the "Company") is at-will, meaning that employment may be terminated for any reason, with or without cause or notice, at any time by the employee or employer. Nothing in this employee Handbook or in any oral or written statement shall limit the right to terminate employment at will. No employee or agent of the Company, other than the President, shall have any authority to enter into an employment agreement—expressed or implied—with any employee providing for employment other than at-will.

This policy of at-will employment is the sole and entire agreement between the employee and the Company as to the duration of employment and the circumstances under which employment may be terminated.

With the exception of employment-at-will, the terms and conditions of employment with the Company may be modified at the sole discretion of the Company including, but not limited to, the following: promotions; demotions; transfers; hiring decisions; compensation; benefits; qualifications; discipline; layoff; hours and schedules; work duties and responsibilities; production standards; subcontracting; reduction or expansion of operations; sale, relocation or consolidation of operations; determinations concerning the use of equipment or facilities; or any other terms or conditions that the Company may determine to be necessary for the safe, efficient, and economic operation of its business.

Immigration Reform and Control Act/E-Verify Statement

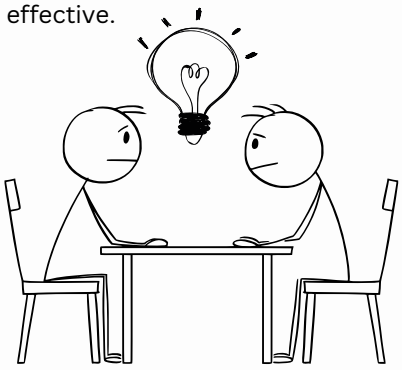
In compliance with the Immigration Reform and Control Act of 1986, every new employee, as a condition of employment, must provide information to complete the Employment Eligibility Verification (Form I-9). Every employee must also within three (3) days of the date of hire, or re-hire, present documentation establishing identity and employment eligibility from the I-9 list of acceptable documents. Photocopies of documents are not accepted; however, the Company may copy and retain copies of documents provided by employees.



Mutual and Voluntary Arbitration

In recognition of the fact that the resolution of differences in court is rarely timely or cost-effective, and to establish and gain the benefits of a speedy, impartial, and cost-effective dispute resolution procedure, the Company has adopted a voluntary, mutual arbitration program.
Under the program, any legal claims that the Company may have against an employee and any legal claims an employee may have against the Company will be resolved by a neutral arbitrator, outside the court process.

Participation in the program is entirely voluntary. All employees will be automatically enrolled in the program unless they return the opt-out form excluding themselves from the benefits of the program. If an employee wishes to opt-out they must return the opt-out form within 30 days after their receipt of the Mutual and Voluntary Arbitration Plan. The form should be returned to Human Resources, 3 Pluff Avenue, North Reading, MA 01864, and it must be postmarked within 30 calendar days after receipt of the Plan to be effective.



Employees who transfer from one location to another will be required to complete a new I-9 for the new location.
To determine whether Form I-9 documentation is valid, the Company uses E-Verify's photo matching tool to match the photograph appearing on some permanent resident and employment authorization cards with the official U.S. Citizenship and Immigration Services' (USCIS) photograph. Employees who receive notices from the Social Security Administration (SSA) or Department of Homeland Security (DHS) indicating that the combination of name and social security number do not match their records are responsible for resolving these issues directly with those agencies.

Moonlighting

Outside Employment (Salary Employees)

The Company discourages salary employees from taking additional outside employment. Salary employees who wish to take on outside employment must first obtain permission from the Company President. Work requirements for the Company, including work beyond the employee's minimum required hours, must take precedence over any outside employment.

- The Company will not permit any salary employee to take an outside job with a Company in the same or related business as the Company, or which is in any way a competitor of the Company.
- If the Company permits a salary employee to take outside employment, the salary employee must report to their manager when the outside job has started. If, because of this moonlighting, the employee is unable to work when requested by the Company, or is unable to maintain a high work performance level at the Company, permission to work at the outside job may be rescinded, or the employee may be subject to dismissal.
- Salary employees are not permitted to work for any client of the Company outside of the regular working hours as described above, without the express approval of the Company President or his designee.

Outside Employment (Hourly Employees)

Hourly Employees are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below:

- Activities and conduct away from the job must not compete with, conflict with, or compromise the Company's interests or adversely affect job performance and the ability to fulfill all job responsibilities. Employees are prohibited from performing any services for customers on nonworking time that are normally performed by the Company. This prohibition also extends to the unauthorized use of any company tools or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during paid working time.
- Full-time hourly employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel or refusal to work overtime or different hours. If the Company determines that an employee's outside work interferes with performance, the employee may be asked to terminate the outside employment.
- Hourly Employees who have accepted outside employment may not use paid sick leave (if available) or vacation time to work on the outside job. Fraudulent use of sick leave or vacation time will result in disciplinary action up to and including termination.

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their job. At times, an employee may be faced with situations in which business actions taken on behalf of the Company may conflict with the employee's own personal interests. Company property, information or business opportunities may not be used for personal gain.

Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, employees must seek review from their manager or the Human Resources department.

Violations of this rule may lead to disciplinary action, up to and including termination.

Examples

- *Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while employed with the Company.*
- *Hiring or supervising family members or closely related persons.*
- *Owning or having a substantial interest in a competitor, supplier, or contractor.*
- *Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all Company employees.*

Personnel Record Maintenance and Responsibility

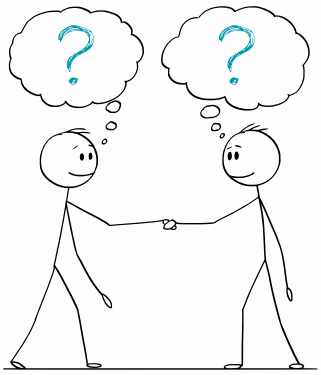
It is the employee's responsibility to provide current information regarding their address, telephone number, insurance beneficiaries, change in dependents, marital status, etc. Please notify Human Resources and your Payroll Representative with any changes to address, phone number, emergency contact information, marital status, number of dependents, etc. Changes in exemptions for tax purposes will only be made upon the receipt of a completed W-4 form.

The Company is not required to disclose to an employee any information in the personnel file if (1) the employee is the subject of an investigation at the time of the request and disclosure would prejudice law enforcement, or (2) the file contains information relating to a government security investigation.

Massachusetts employees will be notified within 10 days of the Company placing in their personnel file any information that is, has been, or may be, used to negatively affect the employee's qualification for employment, promotion, transfer, additional compensation, or the possibility that the employee will be subject to disciplinary action.

Upon written request to Human Resources, employees will be allowed to inspect or receive copies of their respective personnel records within five (5) business days. Such review will be permitted up to two (2) times during each calendar year, but review caused by the placing of negative information in the personnel file will not be considered one of those two (2) annually permitted reviews.

On agreement between the Company and employee, personnel file information with which the employee disagrees may be removed or corrected. Where the employee and the Company cannot reach agreement to remove or correct the disputed information, the employee may submit a written rebuttal. The employee's explanation will be maintained as part of the personnel file and will be transmitted or disclosed whenever the file or record is made available to a third party. The inclusion of any written employee statement without further comment or action by the employer does not imply or create the presumption that the Company agrees with the statement.



Introductory Periods

The first 90 days of employment is considered an introductory period. During this period, employees will become familiar with the Company and their job responsibilities, and the Company will have the opportunity to monitor the quality and value of each employee's performance and make any necessary adjustments in their job description or responsibilities. The introductory period with the Company can be shortened or lengthened as deemed appropriate by management and Human Resources. Completion of this introductory period does not imply guaranteed or continued employment. Nothing that occurs during or after this period should be construed to change the nature of the "at-will" employment relationship.

Employee Classifications

All employees are designated as either non-exempt or exempt under state and federal wage and hour laws. The following is intended to help employees understand employment classifications and employees' employment status and benefit eligibility. These classifications do not guarantee employment for any specified period. The right to terminate the employment-at-will relationship at any time is retained by both the employee and the Company.

The Fair Labor Standards Act (FLSA) establishes standards and criteria for minimum wage and overtime requirements. Non-exempt employees are employees who are generally paid by the hour and qualify for overtime. Exempt employees are generally salaried managers, or professional administrative or technical staff, who are exempt from the overtime provisions of the FLSA.

Employee Classifications (Continued)

Temporary workers are not eligible for company benefits unless specifically stated otherwise in company policy or are deemed eligible according to plan documents.

Regular Full-Time

Employees who are regularly scheduled and expected to work a minimum of 35 hours per week on a non-temporary basis. Generally, these employees are eligible for the full benefits package, subject to the terms, conditions, and limitations of each benefits program.

Regular Part-Time

Employees who work variable hours week to week, but generally less than 30, on a non-temporary basis. Regular, part-time, or variable hour employees may be eligible for some of the benefits offered by the company subject to the terms, conditions, and limitations of each benefits program.

ACA Eligible

Employees who work variable hours week to week, at least 30 but generally less than 35, on a non-temporary basis. ACA Eligible employees are eligible for some of the benefits offered by the company subject to the terms, conditions, and limitations of each benefits program.

Temporary Full-Time

Employees who are hired as interim replacements to temporarily supplement the workforce or to assist in the completion of a specific project, and who are temporarily scheduled to work the company's full-time schedule for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status.

Temporary Part-Time

Employees who are hired as interim replacements to temporarily supplement the workforce or to assist in the completion of a specific project, and who are temporarily scheduled to work less than the company's full-time schedule for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status.

Performance Evaluations & Pay Reviews

Performance evaluations and discussions will focus on general conduct and job performance.

Wage increases are determined by various factors including, but not limited to, company performance, tenure, performance appraisals and/or increased responsibilities. It is important to realize that wage increases are provided at the Company's discretion and are not guaranteed.

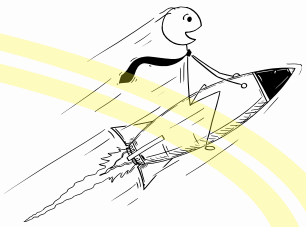
ReHires

Involuntarily terminated employees may not be eligible for re-hire. Employees who leave voluntarily may be eligible for re-hire if they meet the same conditions listed under the Internal Transfers section of this handbook.

Pre Employment Assessment

Some positions at the Company may require a pre-employment assessment. Current employees applying for another position within the Company may be asked to successfully complete an assessment before assuming their new role. The Human Resources Department arranges pre-employment and pre-promotion assessments.

Promotions, Career Advancement and Management Opportunities



When evaluating employees for promotion, several factors including job performance, job related qualifications, educational background, and experience with the Company and our industry are considered. Our policy is to promote interested, qualified employees into management positions. To be considered for a promotion, employees must have received positive performance appraisals, and completed all training and certification. All promotion decisions are made at the sole discretion of the Company.

We always strive to promote from within!



Internal Transfers

It may be possible for an employee to transfer from one department to another, within the Company, as long as the following conditions are met:

- The previous performance appraisal was positive.
- There must be a position open in the department to which the employee requests to transfer.
- The supervisor makes the final decision, based on their discretion, after an employee interview.
- Rate of pay, availability of hours, and available positions are not guaranteed. These details should be finalized prior to transferring.

Background and Reference Checks

To ensure that individuals who join the Company are well qualified and to ensure that the Company maintains a safe and productive work environment, it is our policy to conduct pre-employment background checks on all applicants who accept an offer of employment. Background checks may include verification of any information on the applicant's resume or application.

All offers of employment are contingent upon receipt of a background check report that is acceptable to the Company. All background checks are conducted in conformity with the Federal Fair Credit Reporting Act, the Americans with Disabilities Act, and state and federal privacy and antidiscrimination laws. Reports are kept confidential and are only viewed by individuals involved in the hiring process.
If information obtained in a background check would lead the Company to deny employment, a copy of the report will be provided to the applicant, and the applicant will have the opportunity to dispute the report's accuracy. Background checks may include a criminal record check, although a criminal conviction does not automatically bar an applicant from employment.

Additional checks such as a driving record or credit report may be made on applicants for job categories if appropriate and job related.

The Company also reserves the right to conduct a background check on current employees to determine eligibility for promotion or reassignment in the same manner as described above.

Employment of Relatives and Workplace Relationships

The Company recognizes that both positive and negative consequences exist when hiring members of the same family. It is our philosophy that the hiring of family members should not be an automatic “yes” or “no” situation, but rather a decision guided by several job-related factors and circumstances. Factors that will be considered include: will they be reporting directly to a family member, working in the same location, or reporting to the same manager; uniqueness of and/or the Company’s need for the individual’s skills; and meeting the job requirements.

To ensure that these and other important factors are considered, any supervisor or manager who wishes to hire a person related to a current employee must obtain approval from senior management prior to a job offer being discussed or extended to that individual.

While the Company does not strictly forbid employees starting a personal relationship, it is discouraged. It is important that these relationships do not interfere with work performance or raise any discrimination or harassment concerns.

If employees begin a dating relationship or become relatives, partners, or members of the same household, and if one party is in a supervisory position, that person is required to inform management and Human Resources of the relationship.

The Company strictly prohibits the employment of immediate family members (including spouses, siblings, parents, children, in-laws, etc.) whenever they would be reporting directly to another immediate family member. If the family relationship is established through marriage after employment, the Company will attempt to find a comparable alternative position for the affected employees. If no alternative position is available, the Company will ask the employees to decide among themselves which one will resign. If the employees cannot decide, then the Company will choose for them.

Communication

The Company strives to keep employees well informed and to ensure that all employees are aware of anything that will have an impact on their job. The Company also asks that employees make the effort to communicate their thoughts about the business. Employees know their job better than anyone else; if an employee has ideas on how to improve processes, please communicate this. To communicate ideas from employees and to give them a forum to share their ideas, employees are occasionally asked to attend meetings.

Texting

Texting employees is allowed for communication only when looking for an immediate response, sending information, or notifications. Managers cannot text employees looking for substantive information.



Open Door Policy

Misunderstandings or conflicts can arise in any organization. If anyone has a question or a complaint or is bothered by a job-related situation, they should first speak with their manager. This is usually the best way to seek resolution of problems and is a matter of professional courtesy. If, however, the issue is not resolved, employees are encouraged to bring their concern to upper management.

Should a concern not be satisfactorily addressed or be one that an employee would rather not discuss with their manager, the employee should contact the Human Resources Department. The Human Resources team will advise and counsel on a wide range of issues, as well as clarify and answer questions regarding Company policies, and are responsible for investigating all grievances brought to the Company’s attention. Our Crew Care Line is 1-888-539-8666 or email at crewcare@scrivanos.com .

crewcare@scrivanos.com

Bulletin Boards, Schedules and Postings

In the main office there is a bulletin board which is used to communicate information and announcements. Important information such as scheduling and meeting information is also posted so that employees will always be aware of upcoming events that may require their participation. Changing the schedule, unless approved by management, or defacing the postings is prohibited and may result in disciplinary action up to and including termination of employment.

The bulletin board is to be used for company-related material only. Posting any personal materials on the bulletin boards without prior authorization from management is not allowed.

For certain departments, the employee work schedule will be posted no later than Friday for the upcoming week. Our workweek runs from Sunday through Saturday.

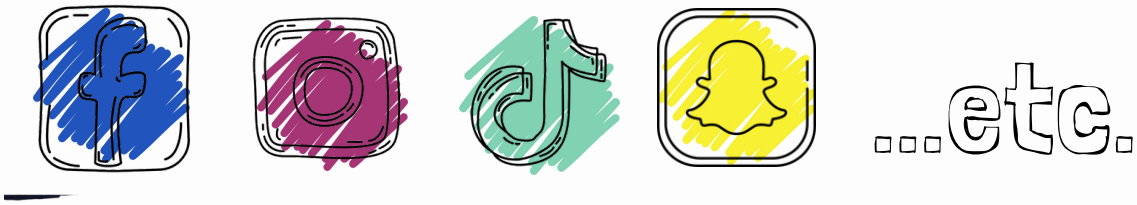
If an employee has any scheduling requests, they should be submitted to their supervisor a week before the schedule is posted. The manager will consider the request; however, schedules are made based on the business needs and therefore employee requests may be denied.

Schedules are completed based on availability, ability, performance, and the needs of the business. If an employee has concerns about their schedule, they should speak with their supervisor.

Social Media and Internet Policy

The purpose of this policy is to encourage clear and consistent communication with customers and the media, to protect the trade secrets and intellectual property rights of the Company, and to promote compliance with state and federal laws, including Federal Trade Regulations and the National Labor Relations Act. Employees are also advised that the Company maintains workplace policies prohibiting sexual harassment and other misconduct which equally apply to social media activities.

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Dunkin' or the Company, as well as any other form of electronic communication. You are solely responsible for what you post online. Before creating online content, keep in mind that any of your conduct that adversely affects your job performance, the performance of your coworkers, or our customers or vendors may result in disciplinary action up to and including termination.



Social Media Rules and Guidelines:

- Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

- Keep in mind that you are more likely to resolve work-related complaints by speaking directly with your manager or by utilizing our Crew Care hotline than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, employees of the Company, or vendors, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

- Never post any information or rumors that you know to be false about the Company, or its employees, customers, vendors, or competitors.

Social Media and Internet Policy (Continued)

Social Media Rules and Guidelines:

- Do not create a link from your blog, website or other social networking site to a Dunkin' or NGP Management website without identifying yourself as an employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for the Company or Dunkin' Brands. If the Company is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of the Company, its employees, customers, vendors, or people working on behalf of the Company.
- Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager.
- Do not post videos or pictures of yourself or other employees, customers, or vendors inside or on company property.
- Do not post pictures or videos of yourself wearing any part of the Dunkin' uniform with our Company logo.
- Do not use your Company email address to register on social networks, blogs or other online tools utilized for personal use.
- Managers and supervisors should avoid social media relationships with non-managerial employees, except in cases where the relationship is limited to business-related networking or there is a legitimate business purpose.
  The Human Resources Department is responsible for providing references for employees, in accordance with the Company's policy as well as to comply with federal and state employment laws. Managers and supervisors should not provide references for current or former employees via social networking sites (e.g. LinkedIn).

Testimonials and Endorsements

The Company utilizes the services of marketing professionals who market the Company's goods and services. In addition, the Federal Trade Commission ("FTC") has established detailed regulations (16 CFR Part 255.5) concerning information that must and must not be disclosed in testimonials and endorsements (of products or companies), including those made via social media.

Because of the regulation of this area by the FTC, the Company prohibits any social media posts concerning the Company or its products that are not in compliance with the FTC's mandate. Accordingly, testimonials or endorsements about the Company or its products should be avoided.

If an employee uses social media for any testimonials or endorsements of the Company or its products, the employee must clearly and conspicuously disclose their relationship to the Company to members and readers of the social media site or post.

Protect the Trade Secrets, Intellectual Property Rights, and Privacy Rights of the Company, Its Employees, and Its Customers

The Company's livelihood depends on its trade secrets and intellectual property rights remaining protected. To this end, employees are prohibited from posting any information on social media that would reveal trade secrets, confidential strategic business initiatives (e.g., a new advertising or business strategy, acquisition, or product), or compromise the Company's intellectual property rights in any way.

Similarly, and in accordance with state and federal law, employees are prohibited from posting confidential personal information about customers or employees, which includes but is not limited to another employee's social security number, protected health information, credit card numbers, driver's license number, mother's maiden name, complete date of birth, minor children's names.

Employees also may not use any client or vendor trademarks or logos for commercial use without the client or vendor's express permission. The Company expects all employees to abide by all Copyright laws.

Social media is not for everyone, and many employees opt not to socialize with their co-workers, via social media or otherwise. To this end, employees are not required to connect with any co-worker or to "friend" them on social media sites. Employees are prohibited from threatening other employees to coerce them into engaging in social media activities.

Social Media and Internet Policy (Continued)

No Expectation of Privacy

Employees are reminded that they should have no expectation of privacy when using the Internet, which includes social networking sites, during working time or when using the Company's equipment.

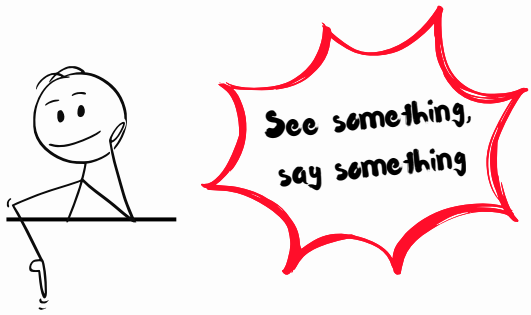
Non-Interference with Applicable Laws

This policy is not intended to restrict or interfere with any employee's federal or state labor law rights, including all rights under the National Labor Relations Act, or any whistleblower protections under federal or state law.

Please contact Human Resources if you have any questions about this policy.

Criminal and Civil Liability

There could be instances where postings by employees create potential criminal or civil liability for the Company. If the Company determines that to be the case, it reserves the right to demand the posting be removed.



Obligations to Report Violations of this Policy

If an employee becomes aware of a violation of this policy, please report it to an appropriate manager or to Human Resources.

If an employee feels they are being harassed, discriminated against, or retaliated against for reporting a violation of this policy, they should immediately report this to their manager or to a member of Human Resources.

Be Wary

People who communicate online may not be who they claim to be. They could be competitors, media, regulators, or others seeking "insider information" about the Company.

Everything written online can be traced back to its author. Additionally, information is often repeated and linked to other sources, so even an incidental comment can go viral. Further, there are countless viruses and spyware on the internet with clever methods for infecting computers. Be careful and report any unusual behavior by computers.

Media Policy

While we are dependent upon the media to keep us current on local, national, and global events, reporters sometimes solicit information that, when reported, has unintended consequences, both for the individual providing the information and the subject of the story. Such consequences can include misquotes, messages reported out of context, and negative press. As a member of the Dunkin' Brands family, there may be occasions when an employee is contacted by a member of the media (newspaper reporter, television reporter, trade publication writer, etc.) to comment on an issue or area related to the Company. In keeping with our collective goal to positively promote Dunkin' Brands, Dunkin' and the Company, it is critical that all media inquiries be directed to those individuals within the organization who are experienced in working with the media and appropriately screening, evaluating, routing, pursuing, or declining media opportunities.

By funneling all media inquiries through these individuals, we can help ensure a one-voice, one-message communication strategy with the media and reduce the risk of unintended consequences.

The fastest way to access the right people with the right expertise for the Company is by calling the following: Human Resources, District Manager, and Director of Operations.

In the event an employee receives a call from the media, below is a simple, yet effective, list of what to do and not do in dealing with the media:

Any questions or requests by a member of the media or other sources must be directed to the District Manager, Director of Operations, or Human Resources. Do not make any statements on behalf of the Company without prior approval from these individuals.

Employees must alert a manager if they witness a member of the media photographing, filming, or interviewing people on company property. Management has been trained on how to properly respond, so please allow them to do so.
Feel free to speak with a member of management with any questions on this policy.

Media Policy (Continued)

Do

Be Polite and Courteous. Contact your Manager or Human Resources immediately.

Be helpful without providing specific information.

Demonstrate genuine concern (especially if the situation involves a crisis).

Find out as much as you can from the reporter (Affiliation, contact information, deadline, etc.).

Review the Company media relations policy with all employees on all shifts. Inform the employees that they should not comment to the press, and if approached they should respond by directing all questions to Human Resources.

Do not

Allow media to film, photograph, or interview customers or employees on the premises. Do not minimize a problem to a reporter.

Act defensive, angry, or unconcerned.

Volunteer information, speculate on any question, or assign blame to anyone.

Give a “no comment” response (implies denial).

Violate anyone’s privacy (such as providing names and personal information for customers or employees).

Tell employees that they can talk to the press after their shift is over. Tell employees to say, “I am not allowed to talk to the press” instead encourage them to say, “you should speak with our District Manager, they have more information.”

IT End User Policy

The IT End User Policy is designed to provide ground rules on the acceptable use and operation of company-provided equipment and resources. The IT End User Policy is a group of individual policies that apply to all employees who are provided access to electronic resources.

Violation of these policies could result in disciplinary and/or legal action leading up to and including disciplinary action or termination of employment. Employees may also be held personally liable for damages caused by any violations of this policy. All employees are required to acknowledge receipt and confirm that they have understood and agree to abide by the rules hereunder.

All terms and conditions as stated in this document reflect an agreement of all parties and should be governed and interpreted in accordance with the policies and procedures outlined below.

Company Equipment

The Company provides a variety of electronic equipment to help employees do their jobs efficiently and productively, including desk telephones, smartphones, cell phones, tablets, desktop computers, laptops, copiers, fax machines, etc. The company also provides employees access to a variety of electronic resources including email, voicemail, internet access, wireless access, application, and file access technology. All such equipment and resources are provided to employees and are the property of the Company, and they are to be used in conjunction with an employee’s job during their scheduled working hours. Personal use of company-provided equipment and resources during working hours is prohibited.

This policy applies to all equipment and/or electronic resources that are owned or leased by the Company.

IT End User Policy (Continued)

Computer Usage Guidelines

Employees may not import any files or documents that are created outside the Company's premises until the document or file is first scanned for viruses by the computer's anti-virus program.

Employees may not tamper with or attempt to disable or circumvent security systems including antivirus, web filtering and security event logging.

Employees may only install and use software approved by IT Operations. The Company will, from time to time, audit software on computers in the workplace to identify possible unlicensed, illegal, or unauthorized software copies. If such software is found, it will be removed and the person responsible for installing the software, if identified, may be disciplined.

Employees may not tamper with, relocate, or disconnect physical computer systems without authorization from the IT Department.

Confidentiality and Data Security

This Internet Acceptable Use Policy applies to all employees of the Company who have access to computers and the Internet to be used in the performance and/or training of their work. Use of the Internet by employees of the Company is permitted and encouraged during working hours where such use supports the objectives of the business.

If an employee is unsure about what constitutes acceptable Internet or computer usage, then they should ask their supervisor for further guidance and clarification.

All terms and conditions as stated in this document are applicable to all users of the Company's network and Internet connection, or network and Internet connections of its vendors and partners.

Company employees are expected to use the Internet responsibly and productively. Internet access is limited to job-related activities during business hours.



Electronic Privacy

All company-supplied technology, including computer systems, equipment, and company-related work records, belongs to the Company and not to the employee user. Employees understand the company may routinely monitor use patterns, and employees should observe appropriate workplace discretion in their use and maintenance of such company property. Employees have no right to privacy in their use of Company-provided computers or other electronic equipment and resources, including the internet, email, chats, text messaging, voicemail, and phones. Employees may not disguise their identity when creating or transmitting messages or material on or from the Company's electronic equipment or resources.

Employees may not open email messages, other than their own or those which the employee is authorized to open by their manager or by the person to whom the email is addressed. Employees may not fake or alter any emails, faxes, or other communications.

Because all the computer systems and software, as well as email and Internet connections, are the property of the Company, all company policies apply to their use and are always in effect. Any employee who abuses the company-provided access to email, the Internet, or other electronic communications or networks, including social media, may be denied future access, and, if appropriate, be subject to disciplinary action up to and including termination, within the limitations of any applicable federal, state, or local laws.

Confidentiality and Data Security

All employees have an obligation to safeguard the Company's confidential information as well as the confidential information of its customers, clients, and others from disclosure. Among other precautions, employees must comply with the following rules:

1. Never share password or log-in information to Company resources, or resources of partners or vendors of the Company.
2. Do not attempt to access restricted databases, files, or resources without permission.
3. Do not attempt to circumvent security or access controls to restricted resources.
4. Do not leave any messages containing confidential or Personally Identifiable Information visible while you are away from your work area. All confidential or Personally Identifiable Information should remain under lock and key.

IT End User Policy (Continued)

5. Do not send emails outside of the Company that contain private, confidential, or sensitive information to anyone you do not know or who does not have a legitimate need for it. If you must communicate confidential information outside of the company (with our vendors, for example) contact the IT Department for guidance on how to use outbound email encryption.

6. If you must send confidential information within the Company always include “CONFIDENTIAL” in the subject line of the email.

7. Never store or transmit Company or Personally Identifiable Information on or via any third party or cloud services that are not provided by IT Operations. Examples of unapproved services include but are not limited to Dropbox, Box.net, Google Docs, Google Drive, etc.

8. Never store confidential Company information or Personally Identifiable Information on personal USB Drives, CD-ROM’s, DVD’s, home computers or laptops without permission for business purposes.

9. Take all reasonable measures to prevent any laptop or other equipment containing confidential or Personally Identifiable Information from being lost or stolen.

10. You will be required to take periodic data security training sessions.



IT End User Policy (Continued)



Computer, Email, and Internet Acceptable Usage Guidelines:

- Company employees are expected to use the Internet responsibly and productively. Internet access is limited to job-related activities during business hours.
- Incidental personal use of a short, non-regular duration may be permitted while on breaks or personal time with permission from a supervisor. However, personal use may never involve:
- Using Company Internet and email to harass, discriminate, defame, intimidate, or disparage employees, customers, or clients.
- Visiting sites or receiving materials related to discrimination, gambling, pornography, sexually explicit material, or any illegal activity.
- Additionally, employees must not use company computer, email, or Internet access to establish, run, or conduct their own business or that of another business entity.
- Job-related activities include research and educational tasks that may be found via the Internet that would help in an employee's role.
- All Internet data that is composed, transmitted and/or received by the Company’s computer systems is considered to belong to the Company and is recognized as part of its official data. It is therefore subject to disclosure for legal reasons or to other appropriate third parties.

Unacceptable use of the internet by employees includes, but is not limited to:

- Sending or posting discriminatory, abusive, or physically threatening messages or images on the Internet or via the Company’s email service.
- Using computers to perpetrate any form of fraud, and/or software, film, or music piracy.
- Stealing, using, or disclosing someone else's password without authorization.
- Downloading, copying, or pirating software and electronic files that are copyrighted or without authorization.
- Sharing confidential material, Personally Identifiable Information, trade secrets, or proprietary information outside of the organization.
- Hacking into unauthorized websites.
- Sending or posting information that is defamatory to the Company’s products/services, colleagues and/or customers.
- Introducing malicious software onto the company network and/or jeopardizing the security of the organization's electronic communications systems.
- Any instance of passing off an individual’s personal views as representing those of the organization.

Computer, Email, and Internet Acceptable Usage Guidelines (Continued):

- The equipment, services and technology used to access the Internet are the property of the Company and the company reserves the right to monitor Internet traffic and monitor and access data that is composed, sent, or received through its online connections.
- Emails sent via the company email system should not contain content that is deemed to be obscene or offensive.
- All sites and downloads may be monitored and/or blocked by the Company if they are deemed to be harmful to the Company's IT systems.
- The installation of third-party software such as instant messaging technology is prohibited. All third-party software must have prior approval of the IT Manager.



Mobile Device Agreement

This policy pertains to the use of a mobile device. For the purposes of this policy a mobile device includes cell phones, smart phones, tablets, etc.

Company Provided Mobile Device Guidelines and Disclaimers

- Mobile devices that are purchased through the IT Operations Department are the property of the Company. The primary use of the device is to conduct business of the company.
- Mobile devices are centrally managed by the IT Operations department using a Mobile Device Management platform to push security updates and restrict the download of unapproved applications.
- Personal use of an assigned mobile device should be occasional, for example, business-related trips or emergencies. In no cases will a personal mobile device be used with a Company mobile device, either through ESN Change or any other cellular features such as call forwarding.
- Bills will be monitored for excessive utilization, including data usage, text usage, minutes, and international calling/texting. Note: The Company will require that any employee with a company cell phone reimburse fifty percent (one half) of all charges more than the standard plan amount for the month excessive of usage in question.
  Individuals to whom mobile devices have been provided are responsible for the security and maintenance of the mobile device and must promptly report any damage, theft, or vandalism to the IT Operations Department.
- Company-provided mobile devices may not be used to defame, harass, intimidate, or threaten any other person. Employees are prohibited from using their device in any illegal, illicit, or offensive manner.
- Company-provided mobile devices must be returned upon last day of employment or when requested by Human Resources.
- Making modifications to or installing unapproved third-party applications on Company mobile devices without permission of the IT manager is prohibited.
- Employees may receive a protective case with the mobile device, and if provided with one, it must always be used to protect the phone.
- All existing data security and acceptable usage policies relating to company-provided equipment or access over company-provided connections or connections of its vendors and partners also apply to the company-provided mobile device.
- If the mobile device breaks, or requires troubleshooting or service, service must be requested from the Company's IT Operations Department. The employee is not to bring the device for third party service or repair unless instructed to do so by the IT Operations Department.

Mobile Device Agreement (Continued)

Mobile Device Usage and Safety

- Any permitted usage of a mobile device must be kept to a minimum and in no way should usage negatively impact the performance of the employee's job duties.
- Employees involved in motor vehicle accidents attributed to mobile device usage while operating said vehicle may be subject to appropriate disciplinary action, up to and including termination
- Improper usage of company-issued mobile device, or improper or prolonged usage of a personal mobile device, may subject the employee to disciplinary action, up to and including termination.
- Usage of mobile devices while operating a motor vehicle greatly increases the odds of a serious or fatal accident occurring. Therefore, employees are prohibited from using any mobile device while operating a motor vehicle during employment.

BYOD Policy

Bring Your Own Device (BYOD) is the concept of accessing corporate resources from personal, non-company-owned device. This BYOD policy applies to any employee who is assigned a corporate email account who chooses to access corporate email or Company resources from their personal device, including smartphone, tablet, laptop or computer.

BYOD Guidelines and Disclaimers

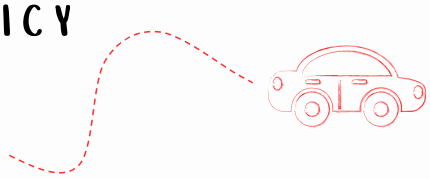
- The IT Manager may disable access to BYOD capabilities and services at their discretion.
- The act of adding Company email to a personal phone is not mandatory and can be performed at the discretion of the individual.
- Technical Support for personal devices is not provided by the Company. Any support offered is at the discretion of the IT Manager and is to be provided on a best-effort basis.
- The Company will not provide loaner equipment to replace personal devices.
- The act of adding a Company email account to a Personal Device does not constitute the device as a company-owned resource, however, all Corporate System Access Policies and Internet Acceptable Use Policies are still applicable as they relate to the access of company resources or accessing information over company-provided connections or the connections of its vendors and partners.
- Employees who choose to add corporate email to their device must adhere to security policies set forth by the IT Manager, including device security access pins.
- The employee's device may be remotely wiped if:
    - The device is lost.
    - The employee terminates their employment.
    - IT detects a data or policy breach, a virus, or similar threat to the security of the company's data and technology infrastructure.
    - It is the responsibility of the employee to back up personal information stored on the device to protect from loss in the event of a remote wipe.

Company Vehicle and Driver Policy

This policy sets out the Company's statement in relation to the safe operation of Company vehicles, vehicles used for Company business, as well as the requirements for the use and maintenance of vehicles.

The Company promotes safe driving. All employees should ensure that they drive with their safety and the safety of others in mind.

Company Vehicle and Driver Policy (Continued)



General

- All employees who drive on behalf of the Company or use a Company vehicle are required to provide a copy of their valid driver's license on an annual basis at the anniversary of their employment, or at other times if requested by management. Failure to do so will result in disciplinary action and potential suspension.
- Employees who use their personal vehicle for Company business must possess proper auto insurance coverage.
- Employees are required to notify the Company immediately if their license is suspended or revoked.
- Employees should ensure that they always drive in a safe manner.
- Any employee who commits a traffic violation may be subject to disciplinary action and, in serious matters, may face termination.
- Employees will be liable for any moving violations including any speed camera or similar fines.
- No employee may drive a Company vehicle when they are physically or mentally unfit to drive. Employees should immediately notify the Company of any condition that may affect the employee's ability to drive.
- Employees must never allow an unauthorized person to drive a Company vehicle unless it is an emergency, and preferably with prior Company approval.

Servicing and Maintenance

Employees are responsible for ensuring that Company vehicles are serviced and maintained in accordance with the required service schedule.

Safety Factors

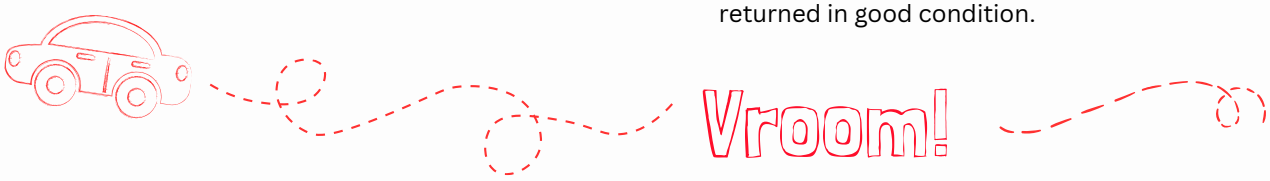
- Employees must check the safety of the vehicle before driving.
- Employees must not drive under the influence of drugs and alcohol, or prescription medication that impairs their ability to operate a motor vehicle.
- Employees should not drive when overly tired.
- Always drive safely within the restrictions of the road conditions.
- Employees should take special care during adverse weather conditions.
- Do not eat or drink while driving as this may place additional risk of an accident.
- Employees should take care of their personal safety and not park the vehicle in areas where safety might be endangered.

Accidents

- In the unfortunate situation of an accident, the employee should ensure their own safety and the safety of any other passengers involved.
- Details of the accident should be noted together with the full details of any other vehicles or persons involved in the accident.
- Under no circumstances should any admission of liability be made.
- As soon after the accident as possible, the details should be reported to the Company. The employee must complete the Company accident report within 24 hours.
- If the accident has been due to any failure or neglect on the employee's part, then disciplinary action may be taken once the facts of the incident have been obtained.

Vehicle Return

- The employee shall return the Company vehicle as requested by the Company.
- Upon termination of employment, the employee will return the vehicle to the appointed location on the day appointed by the Company. The vehicle shall be returned in good condition.



Workplace Bullying

The Company defines bullying as repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment.

The purpose of this policy is to communicate to all employees and managers that the company will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration. As in sexual harassment, it is the effect of the behavior upon the individual that is important. The company considers the following types of behavior examples of bullying:

- Verbal bullying: Slandering, ridiculing, or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assault, or threat of physical assault; damage to a person's work area or property.
- Gesture bullying: Nonverbal threatening gestures or glances that convey threatening messages.
- Exclusion: Socially or physically excluding or disregarding a person in work-related activities.
- Cyber bullying: Cyberbullying includes sending, posting, or sharing negative, harmful, false, or hostile content about someone else. It can include sharing personal or private information about someone else, causing embarrassment or humiliation.

Workplace Violence Policy

The Company is committed to maintaining a safe and healthy environment for all employees and will not tolerate any form of violence or abusive behavior committed by or against any member of its community. All reports of violence or abusive behavior will be taken seriously by management.

Violent and abusive behavior include any attempted, threatened, or actual conduct that endangers or is likely to endanger the health or safety of employees, customers, or vendors; or any threatening statement, harassment, or behavior that gives the employee, customer, or vendor reasonable cause to believe that their health or safety is at risk. Accidents are not considered workplace violence or abusive behavior even though safety or property may be at risk or harmed.

Employees who engage in actions or threats of violence or abusive behavior will be subject to the appropriate discipline up to and including termination.

Examples of violence and abusive behavior violating this policy include but are not limited to the following:

- Slapping, punching or otherwise physically attacking a person.
- A direct or implied threat of harm or hostile behavior that creates a reasonable fear of injury to another person, or unreasonably subjects another individual to emotional distress.
- Brandishing a weapon or an object which appears to be a weapon in a threatening manner.
- Intimidating, threatening, or directing abusive language toward another person.
- Stalking.
- Intentionally damaging Company property or the property of an employee, customer, or vendor.
- Committing acts motivated by or related to racial, religious, or sexual harassment or domestic violence.

Procedure

Any individual who experiences or is a witness to violence, threats of violence or harassing behavior, violating this policy or who has reason to suspect that these acts or behaviors are occurring should immediately notify a manager or Human Resources. Confidentiality will be maintained to the extent possible but is not guaranteed. Retaliation or harassment against a person making a report in good faith will not be tolerated and may result in disciplinary action.

Workplace Violence Policy (Continued)

Weapons

Weapons are generally defined as guns, knives and other objects universally considered a weapon by most of the society. A “weapon” can also be any object that would do harm to another when used as such. The Company shall deem any such object a “weapon” for the purpose of enforcing this policy.

Possession of weapons is prohibited on company property and while on duty performing company business at any location. Any employee on duty or on company premises in possession of a weapon will be subject to immediate termination.

Employees are expected to immediately report any weapon possession or any violation of this policy to a manager or the Human Resources department. Any employee found threatening another employee, fighting, and/or carrying weapons to the worksite will be subject to immediate termination.

Despite laws allowing concealed carry of weapons and firearms, the company prohibits all employees from possessing any weapons, including firearms, while on company property and while on duty performing company business at any location.

Employees parked on company property may not store weapons or firearms in their vehicles at any time. Violations of this may result in disciplinary action up to and including termination.

Violence

Threats of violence or acts of violence are strictly prohibited. Employees threatening or committing acts of violence will be subject to appropriate disciplinary action, up to and including termination. Report any such activity to your immediate manager or the Human Resources Department.

Drug Free Workplace

The Company is committed to the principle of maintaining a drug-free workplace, free from the effects of alcohol, illegal drugs, or other intoxicating substances that cause potential health, safety, and/or job performance problems. Drug use and abuse in the workplace endangers fellow employees, safety, company morale, and production.

Possessing, using, manufacturing, selling, or distributing alcohol, illegal drugs or drug-related paraphernalia is not permitted on company property or on work time. Furthermore, employees are not permitted to report for duty while under the influence of alcohol, illegal drugs, or other illegal substances.

If an employee believes that a prescription drug or over-the-counter medication may impair their ability to perform their job safely, then it should be discussed with their immediate manager before returning to work.

Employees failing to adhere strictly to this policy will be removed from work and subject to disciplinary action, up to and including termination. Depending upon the circumstances, other action, including notification of appropriate law enforcement agencies, may be pursued. Employees are responsible for reporting any suspicious activity to a manager or the Human Resources department.

Despite recent laws permitting recreational possession and use of marijuana, the company does not permit or accommodate employees’ use or possession of marijuana or products containing marijuana in the workplace. The company expressly prohibits employees from possessing or consuming marijuana in the workplace and/or from reporting to work under the influence.

Medical Marijuana

The Company does not discriminate against applicants or current employees who are licensed to possess and/or consume marijuana for medicinal purposes. The Company, however, will not tolerate possession or consumption on Company premises or during working time. Moreover, the Company will not tolerate an employee being under the influence of medical marijuana on Company premises or during working time.

Employee Assistance and Drug Free Awareness

Illegal drug use and alcohol misuse have several adverse health and safety consequences. Information about those consequences and sources of help for drug/alcohol problems is available from the Human Resource department.

The Company will assist and support employees who voluntarily seek help for such problems before becoming subject to discipline and/or termination under this or other policies. Such employees may be allowed to use accrued paid time off, placed on leaves of absence, referred to treatment providers and otherwise accommodated as required by law. Such employees may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if they hold jobs that are safety sensitive or that require driving, or if they have violated this policy previously.

Employees should report to work fit for duty and free of any adverse effects of illegal drugs or alcohol. This policy does not prohibit employees from the lawful use and possession of prescribed medications. Employees must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely, and promptly disclose any work restrictions to their manager. Employees should not, however, disclose underlying medical conditions unless directed to do so.

Need help? Speak up, reach out: HR@scrivanos.com

Workplace Sanitation and Safety

One of the Company's main objectives is to have a safe and sanitary environment for our employees to work and for our guests to enjoy our food and atmosphere. Employees of the Company have the greatest opportunity to impact this environment.

The following is a list of some of the ways that you must be a positive force in our aim to have a safe and sanitary restaurant.

Not following these practices may result in serious illness or injury. Therefore, not following these policies may result in disciplinary action up to and including termination.

Sharp Objects (Sharps)

Sharps injuries can cause considerable anxiety because of the fear of contracting blood borne pathogens. The risk of contracting a disease from an exposure is dependent upon several factors. This policy describes the steps necessary for handling and for disposal of sharp objects to prevent injury and illness to employees, customers, and waste handlers, as well as to reduce pollution to the environment.

Definition of Sharps

Sharps – needles and syringes, razor blades, broken glass, lancets and infusion sets, and other used items that could cause a puncture, cut or abrasion.



Procedures - Handling of Sharps

- If there is evidence of a sharp, report it to your manager immediately.
- Use caution when handling any sharps. Do not touch with bare hands. Use dark green rubber gloves from the Right to Know Station to pick up the sharp, or use a broom and dustpan.
- While wearing gloves, transfer sharps from dustpan to an empty, rigid, puncture-resistant container, such as Dawn Detergent or Spic & Span Quaternary Sanitizer.
- Screw top of container securely, tape closed with heavy-duty tape and label bottle "Do Not Recycle."
- Wear gloves when emptying the restroom trash. Do not push down on trash. Pull bag directly up and away from your body. Tie the trash bags ends together, do not allow the bag to encounter your body. Take to the dumpster immediately, and do not leave out back.
- When injured with a sharp instrument, keep calm, and report the injury to the manger. Wash the injured area with soap and water for 15 minutes. Seek medical treatment for an evaluation.
- *Remember* - Never throw loose sharps into the trash or toilet. Never leave sharps anywhere they could injure someone. Never store used sharps in glass bottles, soda bottles, milk jugs, aluminum cans, coffee cans or plastic bags. Never put containers with used sharps in a recycling bin.

Medical Attention

The Company requires employees to notify a supervisor when medical attention is required for any reason, accident, or illness.

In the Event of an Injury

- Notify the supervisor or manager in charge of the shift immediately.
- For minor injuries, seek first aid.
- For serious injuries requiring medical attention, management will assist in getting to the nearest hospital/clinic that can help.
- The supervisor will complete a First Report of Injury pertaining to the injury.
- The employee completes the statement of facts section of the Injury Report form.
- The hospital/clinic will ask patients to fill out some forms for workers' compensation.

Appropriate forms are to be returned to your supervisor within 24 hours of seeking medical treatment.

Communicable Diseases and Pandemic Policy

The Company is committed to providing a safe and healthy workplace for all their employees. The Company follows the most current CDC Guidelines. The guidelines can be found on the cdc.gov website.

Worker's Compensation

State and federal law governs eligibility requirements. All premium costs are paid by the Company. Claims are paid directly to employees. All employees are expected to return to work immediately upon release by their physician.

Employees are required to report job-related injuries immediately. Failure to comply could result in difficulty with the employee's claim.

REPORT ALL ACCIDENTS OR INJURIES.



Facilities Security

It is the responsibility of all employees to ensure the facilities and work areas are secure. Any employee entrusted with facility keys shall make certain the facility is secure when that employee is the last to leave. Employees should see their immediate supervisor if they will be left with this responsibility. This includes, but is not limited to, turning off appropriate lights, closing and locking all doors and windows.

Report any potential security risks to your immediate supervisor.

Hazard Communication

A written hazard communication program "Right to Know" can be found in the office. Before beginning work, employees will be provided training to ensure that they are able to:

- Identify areas in the office where hazardous products are present.
- Find hazard information, including the Safety Data Sheets (SDS) file and the company's written Hazard Communication Program.
- Use product labels and SDS forms to identify hazards and appropriate safety precautions.
- Describe specific work practices that will reduce exposure to hazardous products.
- Identify where protective clothing and equipment is kept and how to use it properly.



Smoking / Vaping

The Company has a no-smoking policy. In consideration of both smokers and nonsmokers the following apply to maintain a safe and comfortable environment:

- Smoking/vaping is not permitted inside our Dunkin' stores, or in any Company building.
- If an employee smokes/vapes, they may only do so before or after a shift, or during a designated break.
- A manager will inform employees of the areas outside where smoking/vaping is permitted.
- Smoking/vaping is not permitted near the back-door entrance or front door entrance or near the drive thru lines.
- Employees smoking/vaping in any nonsmoking area are subject to disciplinary action, up to and including termination.
- Employees are to be respectful and use an ash tray or trash can to dispose of cigarettes correctly. Do not throw them on the ground or in the landscaping.
- After smoking/vaping, employees must wash hands before returning to work.

Code of Conduct

All employees are to conduct themselves in a responsible, professional, and ethical manner. Employees should treat each other with mutual respect and professionalism. Any unethical or dishonest behavior must be reported to a manager. If there is still no resolution, please contact our Crew Care Line at 1-888-539-8666 or crewcare@scrivanos.com

Reported activities will be investigated by appropriate Company management team members. The management team will determine appropriate means for resolution. Employees found to be conducting themselves in an unethical manner may be subject to appropriate disciplinary action, up to and including termination.

Confidentiality

Our clients and other parties with whom we do business entrust the Company with important information relating to their businesses. It is our policy that all information considered confidential will not be disclosed to external parties or to employees without a "need to know." If an employee questions whether certain information is considered confidential, they should first check with their immediate supervisor.

Do not disclose confidential financial data or other non-public proprietary Company information. Do not share confidential information regarding business partners, vendors, or customers. Misuse or unauthorized disclosure of confidential information not otherwise available to persons or firms outside the Company is cause for disciplinary action, including termination.

This policy is intended to always alert employees to the need for discretion and is not intended to inhibit normal business communications.

All inquiries from the media must be referred to Human Resources.

Breaks

Employee meal periods are important to company productivity and employee health. Employees who work at least six (6) consecutive hours will be provided a 30 minute meal break not to exceed 60 minutes. The meal period will not be included in the total hours of work per day and is not compensable. Hourly employees are to be completely relieved of all job duties while on meal breaks and must clock out for meal periods.

Salaried employees, as they are paid a weekly salary regardless of the hours they work, may choose to take breaks as needed.

Hourly employees are permitted a 15-minute rest break for each four hours of work. Hourly employees on rest breaks are not required to clock in and clock out because this time is considered "time worked" and is compensable and should not leave the premises

We encourage all employees to take breaks during their shifts although hourly employees have the option of waiving their unpaid 30-minute breaks by signing a Break Waiver Form. Once waived, employees may revoke the waiver at any time provided they do so in writing. The company will not retaliate against or otherwise subject any employee to any adverse employment action based on their decision to waive or not to waive an unpaid 30-minute meal break.

Nursing Employees / Pregnancy Accommodations

The Company will provide a private area for the employee to express breast milk that is not a bathroom. Employees must either notify their manager or the Human Resources Department of the need to express breast milk while at work.

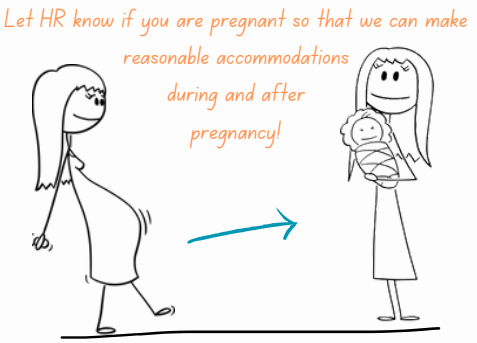
If employees have any questions about or would like to request a reasonable accommodation pursuant to this policy, they should contact Human Resources at 978-898-1201.

The Company will provide a reasonable accommodation for an employee's pregnancy, or any condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child if the employee requests such an accommodation; provided, however, that the Company may deny such an accommodation if the accommodation would impose an undue hardship on the Company's program, enterprise, or business.

"Reasonable accommodations," may include, but are not limited to: (i) more frequent or longer paid or unpaid breaks; (ii) time off to attend to a pregnancy complication or recover from childbirth with or without pay; (iii) acquisition or modification of equipment or seating; (iv) temporary transfer to a less strenuous or hazardous position; (v) job restructuring; (vi) light duty; (vii) private non-bathroom space for expressing breast milk; (viii) assistance with manual labor; or (ix) a modified work schedule; provided, however, that the Company is not required to discharge or transfer an employee with more seniority or promote an employee who is not able to perform the essential functions of the job with or without a reasonable accommodation.

Nursing Employees / Pregnancy Accommodations (Continued)

The need for and nature of such reasonable accommodations will be determined through a good faith interactive process. As part of this process, the Company may require documentation about the need for a reasonable accommodation from an appropriate health care or rehabilitation professional; provided, however, that the Company will not require documentation from an appropriate health care or rehabilitation professional for the following accommodations: (i) more frequent restroom, food, or water breaks; (ii) seating; (iii) limits on lifting more than 20 pounds; and (iv) private non-bathroom space for expressing breast milk. The Company also may require documentation for an extension of the accommodation beyond the originally agreed-to accommodation.



Employees will not be subjected to discrimination in relation to pregnancy. Employees who request or use such reasonable accommodations will not be subject to adverse action or denial of employment opportunities because of the request or use of such reasonable accommodations.

The Company will provide a private area for the employee to express breast milk that is not a bathroom. Employees must either notify their manager or the Human Resources Department of the need to breastfeed while at work.

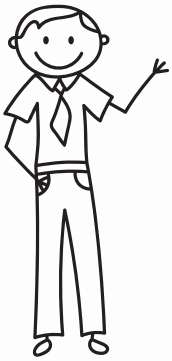
An employee who is breastfeeding her child will be afforded a reasonable opportunity, generally during their break, to express breast milk for a nursing child up to one (1) year following the child's birth. The time may or may not be compensated depending on whether the employee elects to express breast milk during a paid break.

Please note: NGP Management will follow any updates to federal or state laws regarding accommodations for nursing and/or pregnancy accommodations.

Dress Code Requirements

It is important for all employees to project a professional image while at work by being appropriately attired. The Company employees are expected to be neat, clean and well-groomed while on the job. Clothing must be consistent with the standards for a business casual environment and must be appropriate to the type of work being performed.

All employees must be covered from shoulders to knees at all times. Natural and artificial scents may become a distraction from a well-functioning workplace and are also subject to this policy.



The following are *not* allowed:

- Sweatpants
- Sweatshirts
- See through clothing
- Spaghetti straps or strapless tops
- Hats or head coverings unless for religious reasons
- Ripped denim
- Clothing with offensive words or graphics

The Company is confident that employees will use their best judgment regarding attire and appearance. Management reserves the right to determine appropriateness. Any employee who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Continued disregard of this policy may be cause for disciplinary action, which may result in termination.

Tardiness

The Company places a high value on attendance. We expect and need employees to be at work on time during their scheduled workdays. Regular attendance and punctuality are important because they affect an employee's productivity and ability to meet goals, standards, and deadlines.

Absent employees adversely affect Company morale since co-workers must absorb the absent employee's workload in addition to their own. Consequently, the level of service we provide to our customers is diminished.

Our policy is to address and correct attendance patterns that are counterproductive and disruptive, while tolerating normal patterns of absences caused by occasional illness, emergencies, etc.

Employees who have suspicious patterns of absences and excessive incidents of absence may be subject to disciplinary action up to and including termination of employment.

Examples of a suspicious pattern of absenteeism would be repeatedly failing to report absences prior to shift start time, missing a day of work during the first week of employment or other occurrences of absenteeism.

Additionally, three (3) or more tardies in a 90-day period is excessive and subject to disciplinary actions up to and including termination of employment.

Attendance and Punctuality

Absent employees adversely affect Company morale since co-workers must absorb the absent employee's workload in addition to their own.

Time off should be scheduled with a supervisor in advance. Patterns of absenteeism or tardiness may result in discipline even if the employee has not yet exhausted available paid time off.



Our policy is to address and correct attendance patterns that are counterproductive and disruptive, while tolerating normal patterns of absences caused by occasional illness, emergencies, etc.

Employees who have suspicious patterns of absences and excessive incidents of absence may be subject to disciplinary action.

Flexible Working Policy

NGP offers a 5-day REMOTE WORK option to our corporate personnel. We want to provide all of our office employees the option of working from home to deal with special situations, allowing you to focus on your work when you are away from the office. We will not strictly monitor the reasons for your remote workday, but we do expect our employees to use their remote day for the type of situations listed below:

- Emergency home repairs
- Deliveries
- You have an appointment that is close to your home and allows you to maximize your work time by eliminating the commute
- Transportation issues

This policy does not apply to the following departments: REM field, Asset Protection

Guidelines for working at home

- The work-at-home benefit is for planned instances of 4 hours or more, not for an hour here and there; your manager must approve your remote days.
- It is the duty of each individual to track the days they work remotely on UKG. The managers are responsible for keeping records of how many remote days each employee uses each year in order to ensure that no one exceeds the 5-day limit.
- Communication is key! Let your coworkers and management know when you will be working from home, as well as when you will be available and unavailable.
- Teamwork: If you have tasks that need to be completed at the office, make sure you cover them by collaborating with your colleagues.
- Do not take advantage of the policy; we want to continue to provide this benefit, and it will only succeed if everyone works the required hours from home.
- If you take a remote day, you must have suitable day care; this is not a policy that covers your childcare needs.
- If an employee is sick and unable to complete their daily tasks, they must use their sick time rather than a remote workday.
- The 5- remote workdays cannot be carried over from year to year.
- Employees are to design their workplace for efficiency, with all the documents and materials they need.
- Stay connected; check-in with your team to discuss how things are going.
- Establish ground rules for working hours, distractions, and noise while working from home.

Flexible Working Policy (Continued)



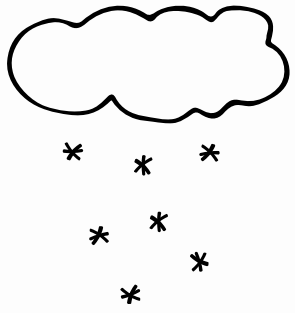
Technology Requirements

- You must be present in the office if you are expected to participate in an event or deliver a presentation.
- It is important to avoid being out of sight and out of mind!
- Loaner laptops must be requested 3 business days in advance. To request a laptop, send an email to helpdesk@scrivanos.com with your manager copied on it. Without your manager's approval, IT will not be able to complete the request.
- IT will only loan a laptop, keyboard, and mouse to individuals who do not have one. External monitors, printers, and scanners will not be available for loan.
- Home printers, monitors, scanners, or any other technology provided by employees will not be connected by IT.
- IT will not assist in troubleshooting home internet connections if it is determined that the person's home internet is not operating or is unsuitable for maintaining a connection.
- If you would like to request loaner laptops, this request must go through your manager to IT. Employees will not be allowed equipment without their manager's approval.

Telephone/Cell Phone Usage

Our telephone is a business line. Phone lines must be kept open for our customers and other pertinent Company business. Employees must ask a manager if they need to make a phone call. Do not ask to make calls or expect to receive calls during our busy hours, unless there is an emergency.

The use of personal devices should be limited during working hours.



Inclement Weather

During inclement weather, employees are expected to report to work on time, or as soon as possible. When severe weather necessitates the closing of a location, the decision must be approved by the region's Director of Operations or the Vice President. Employees will be notified about such decisions by their manager, who will contact them directly.

In the rare event that the office closes for all or part of a shift due to inclement weather, hourly employees scheduled to work when the office is closed and who arrive for their shift without prior notice from management that the location is closed may receive reporting pay if required by applicable state law.

Employees who are not able to make their scheduled shift must notify their manager as soon as possible. If an employee would like to leave early or arrive late due to severe weather conditions, they must request permission from their immediate supervisor. Employees will not be paid for such missed time. However, employees may use accrued paid time off for any hours or days which they do not work due to inclement weather.

Payroll Deductions

Deductions from an employee's paycheck are those required or authorized by law or authorized in writing by the employee. As required by law, the Company withholds taxes from employee earnings, as well as social security (FICA) and Medicare taxes. Additional deductions may include IRS levies, authorized garnishments and deductions (child support, garnishment, and assignment of wages as requested by Court Order). When an employee's check is to be garnished in accordance with a Court Order or state law, the employee will be notified, in accordance with the order, of the fact that the garnishment has been received and the effective date. To terminate a garnishment, the employee is responsible for ensuring that the appropriate paperwork is submitted to HR Payroll. The check stub identifies each deduction and should be kept as a permanent record.

Payment of Wages

It is the Company's policy that employee paychecks will only be given personally to that employee or mailed to his/her home address.

Paydays are on Friday and paychecks are distributed on Friday after 11:00 am.
In the event of a lost paycheck, the payroll department must be notified in writing as soon as possible and before a replacement check can be issued. In the event the lost paycheck is recovered and the Company identifies the endorsement as that of the employee, the employee must remit the amount of the replacement check to the Company within 24 hours of the time it is demanded.

No salary advances will be made.



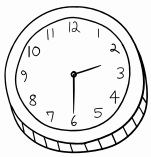
Reporting Personal Information Changes

Employees must notify the Human Resources and Payroll departments whenever there is a change in their personal information on file with the Company. This includes address, phone number, income tax withholding information, emergency contacts and if applicable, any information which may impact their insurance coverage.

If an employee's marital status changes or the number of exemptions previously claimed increases or decreases, a new Form W-4 must be submitted to the Payroll department.

Timekeeping –Tracking Hours Worked

- In order to receive compensation for time worked on the normal Company payday schedule, employees must clock in and out using UKG.
- Employees are not permitted to clock in/out for one another.
- In the event of a missed clock in or out, notify a supervisor immediately so that they can make a manual adjustment to ensure the time is recorded accurately. If a manual adjustment is made the employee may need to confirm on their timecard.
- Excessive misuse of UKG will result in disciplinary action, up to and including termination.
- Employees are expected to clock in for their shift when it is scheduled to start.
- Employees should not arrive or punch in sooner than five (5) minutes before or after the scheduled shift, unless authorized by management.
- Employees are expected to be ready and dressed for work before clocking in.



Overtime

Depending upon work needs, employees may be asked and required to work overtime. Employees must obtain approval from a supervisor prior to working any overtime. The Company follows State and Federal laws regarding overtime pay. Only time worked will be counted when calculating overtime. Employees will be paid for all overtime worked, regardless of whether they received prior permission to do so. However, if overtime is worked without approval, the employee will be subject to disciplinary action up to and including termination of employment.

Nonexempt employees who exceed 40 hours of work time in a workweek will be paid one and a half times their regular rate of pay for all hours worked in excess of 40 hours. Paid leave, such as holiday, sick or vacation pay, does not count as time worked. The workweek begins at 12:00 am on Sunday morning and ends at 11:59 pm on Saturday night.

Employees who anticipate the need for overtime to complete the week's work must notify the supervisor in advance and obtain approval before working hours that extend beyond their normal schedule.

Payroll Questions

The Company intends to accurately compensate employees in compliance with all applicable state and federal laws. Employees must accurately record all time worked to ensure proper payment. Paychecks should be reviewed promptly to identify any discrepancies in pay or deduction. Employees also must not engage in off-the-clock or unrecorded work.

If an employee believes an improper deduction has been taken from his or her wages or that he or she has not been properly compensated for all hours worked – whether for regular or overtime pay – the employee should notify their supervisor or contact Payroll or Human Resources as soon as possible.

Direct Deposit

By request, an employee may have their paycheck directly deposited at a financial institution. The direct deposit settles in their account on Friday. Employees can sign up for direct deposit through UKG. Direct deposits can establish with most banks and credit unions and may take up to 3 pay periods to process. Employees may want to check with their bank or credit union regarding forms that may be require to establish a direct deposit plan. On Fridays a pay advice containing all earnings and deductions will be available in place of a live check.

Reporting Pay

If an employee arrives for a scheduled shift intended to last for more than three hours and the Company is unable to furnish the employee with at least three hours of work, the Company will compensate the employee for all hours actually worked at the employee's regular hourly rate of pay and for the balance of time up to three hours that the employee did not work.

Final Wages at Separation

If a Massachusetts employee is involuntarily terminated, the Company will shall pay all wages in full on their final day of work. If an employee voluntarily resigns the Company shall make payment of their final paycheck on the next regular payday.

Reimbursement of Expenses

Reimbursement is allowed for ordinary and necessary business meal and entertainment expenses with person(s) outside the Company who have an influence on Company business, such as employees of Dunkin' Brand, vendors or bankers. Business meal expenses must be directly related to business and incurred under circumstances conducive to a business discussion. Generally, a restaurant, hotel dining room or similar place would be considered conducive to a business setting.

Meals

Meals that are officially considered business meetings and are defined as meals that include others besides the employee seeking reimbursement



It is a **requirement** to include the following information when submitting a reimbursement request:

- Purpose of the meeting.
- Who attended: the first and last names of everyone in attendance.
- Itemized charges on the restaurant receipt.
- Name and address of the establishment where the meeting was held.

Tips & Gratuities

Company standard percentage for tips and gratuities is 20%. Any tip greater than 20% will not be reimbursed.

Business Gifts

Gifts to any individual are not reimbursable unless approved in advance by management. It is the responsibility of the employee to supply all required information to the Tax Department related to all gifts for which reimbursement is made by the Company.

Processing and Payment: The Accounts Payable Department is committed to processing these reports in a timely manner and ensuring that reimbursement checks are in made within 10 business days providing complete documentation is received to the Accounts Payable department by 12:00 noon on Friday.

Company Credit Card

The President must approve in advance those employees authorized to obtain a Company credit card.

All employees, upon receipt of a Company credit card, are required to sign the “Corporate Credit Card Receipt” form which will be provided by Human Resources. The employee’s immediate supervisor must also sign the form. Employees are responsible for complying with all terms and conditions stipulated by the Company Credit Card.

Employees are required to save all credit card receipts and original vendor receipts and attach to their expense reports as documentation. For purchases made over the phone, please make every effort to obtain a copy of the invoice from the vendor. Ensure that the invoices have the cost, plus any sales tax or shipping and handling charges itemized on it. See instructions and guidelines below.

The Corporate credit card cannot be used to obtain cash advances, bank checks, traveler's checks, or electronic cash transfers for expenses other than those incurred by the assigned employee named on the card, or for personal expenses. Misuse of the card will result in cancellation of the card.

If the card is inadvertently used for an employee's personal expenses, the cardholder should write a check payable to “NGP Management, LLC” for the total amount of the personal purchase. The check will then be deposited in the NGP Management, LLC account by the Accounts Payable Department.

Lost or stolen cards must be reported to the Chief Financial Officer immediately.



Instruction and Guidelines for Completing a Credit Card Expense Report

Company credit card expenditures must be submitted on the “Credit Card Expense Report” form with all of the original receipts attached as described below to the Accounts Payable Department

1. Put your receipts in order as they appear on your portion of the bill.
2. Number the receipts.
3. Enter the date, description and purpose of the charge on the corresponding line on the “Credit Card Summary” form.
4. If a charge pertains to a particular store, enter the code in the Store Code section of the form.
5. Make sure that the total on the credit card summary form equals the total charges on your credit card bill.

Once your Credit Card Summary is balanced, completed and signed, take the following steps:

- ✓ Email the completed Credit Card Summary Sheet in EXCEL as a separate attachment.
- ✓ Scan in PDF format, the completed and signed credit card summary sheet, a copy of your portion of the bill, and ALL the supporting receipts.
- ✓ Save this newly created PDF File using this naming convention - FirstinitialLastnamestatementdate (Example: John Smith’s file would be JSmith070122.pdf)
- ✓ Email attachments to Accounts Payable and Compliance Departments.
  - The scanned PDF file and
  - The COMPLETED Credit Card Summary sheet in Excel
- ✓ Deliver the hard copies of the Credit Card Summary Sheet, a copy of your portion of the bill, and all the receipts to Accounts Payable directly.

Continued or repeated noncompliance with this policy will result in cancellation of the card, required reimbursement for items not in compliance and may result in disciplinary action, up to an including termination.

Acceptable Business Expenses

To be deductible, a business expense must be both ordinary and necessary. An ordinary expense is one that is common and accepted in the industry. A necessary expense is one that is helpful and appropriate for your trade or business.

Business Meals

Meals are officially considered business meetings and are defined as meals that include others besides the employee seeking reimbursement.

- Meals provided at weekly manager meetings are allowed if the meal expense is reasonable. Any unreasonable/lavish amounts will result in disciplinary action up to and including termination.

Acceptable Business Expenses (Continued)

Business Meals (Continued)

- Meals and alcoholic beverage while at sporting events are not a business expense and therefore should not appear on the Company credit card.
- All meal expenses must be accompanied by the detailed receipt of items purchased at the meal.
- For reimbursement please list anyone present at the meal and the purpose of the lunch or dinner meeting.
- Any meals that do not have the correct information and that do not have at least two people will be considered personal charges and will require reimbursement to the company.

Office Supplies

Office supplies must be ordered via approved vendors. No charges for office supplies from other vendors are allowed on your company credit card.

Cleaning Supplies

All cleaning supplies should be ordered through National DCP with your weekly orders. Only supplies needed in an emergency situation should be purchased on the company credit card.

Decorations

Reasonable decorating expenses for major Holidays are allowed. These decorations should be stored for re-use in future years. Major holidays consist of:

- Valentine's Day, St. Patrick's Day, Easter, Independence Day, Halloween, Thanksgiving and Christmas/Chanukah

Fuel Charges

The Company implemented a mileage reimbursement policy whereby all business miles are reimbursed on a monthly basis. No fuel charges or other actual vehicle related expenses should appear on your company credit card. The only exception to this policy is for individuals who are assigned a company vehicle and or van.

Expenses NOT Covered and NOT Approved

- Expenses related to traffic violations or parking violations.
- Credit card delinquency or finance charges.
- Personal Items:
- Expenses incurred on behalf of the employee's spouse or family.
- Miscellaneous personal items (i.e., cigarettes, books, magazines, movies, sporting events, beverages, gum, candy, hair care, oral hygiene products, clothing, etc.).
- Expenses related to commuting between home and work.

Mileage Reimbursement

The Company will reimburse employees if they are required to use their personal car in the fulfillment of Company business. These employees must maintain a monthly log of their business mileage and this log should be submitted as backup to an expense report. The expense report submitted will be audited against the GPS tracking system and any discrepancies found will be adjusted on a quarterly basis. Mileage expense reports must be submitted to Accounts Payable on the Thursday following month end and they will be paid the following Thursday.

All travel and expenses must be pre-approved by your immediate supervisor.

The costs of commuting (travel between home and the work site) will not be reimbursed. REM Management employees should consider their work site to be: 3 Pluff Ave, North Reading, MA 01864.

Mileage will be reimbursed for the round-trip distance between the employee's work site and the location of the business function being attended. If employees depart from or return to their home instead of their work site, only the miles in excess of the normal daily commute can be claimed as an expense.

Mileage amounts must be verifiable through the use of commercially available websites (ex. Mapquest, Google Maps) using the "shortest route" option and this documentation should be submitted as backup to an expense report.

Employee Benefits

Benefits to employees are provided at the will of the Company and we reserve the right to modify or eliminate benefits without notice under conditions of law. The benefits listed herein are intended to be a general description only. Details of specific benefits are outlined in the documentation for the benefit program.

Medical Benefits

Regular full-time employees and ACA benefit eligible employees are eligible for health benefits and can enroll after 60 calendar days of hired day. Upon receiving the benefits packet, it is the responsibility of the employee to complete the online enrollment process within the 60 days. Part time employees will be reviewed annually and may become eligible for health benefits.

The Company contributes a portion of the premium for health insurance. Information about the plans and the cost is included in the benefit packet and is available through the Human Resources Department. Plan design, contribution levels, and vendors are subject to change at the discretion of management. Employees will be informed of any changes in advance.

Group Life Insurance

The company offers eligible full-time employees, who have been employed by the Company for 60 days, employer-paid basic group term Life and Accidental Death and Dismemberment insurance. Eligible employees are enrolled as of the first day of the calendar month following their 61st day of employment, and coverage terminates on the last day of employment.

Flexible Spending Accounts

The company offers eligible full-time employees, who have been employed by the Company for 60 days, participation in a Flexible Benefits Plan. This plan is an employee-funded Health Flexible Spending Account (FSA) and Dependent Care Account (DCA). Eligible employees may elect an annual amount of pre-tax dollars to cover eligible health care and dependent care expenses, including medical or dental insurance deductibles, copayments, and out-of-pocket costs for vision care and other types of care.

Long-Term Disability Insurance

The Company offers eligible full-time employees, who have been employed by the Company for 60 days, employer-paid Long-Term Disability (LTD) insurance. This noncontributory base plan provides for monthly LTD benefits of 60% of basic monthly earnings to a maximum benefit of $6,000 per month, less any other offsets. Eligible employees are automatically enrolled as of the first day of the calendar month following their 61st day of eligibility, and coverage terminates on the last day of employment.

Short-Term Disability Insurance

The Company offers eligible full-time employees, who have been employed by the Company for 60 days, employee-paid Short-Term Disability (STD) insurance. This base plan provides for STD benefits of 60% of basic weekly earnings to a maximum benefit of $1,200 per week, less any other offsets. Eligible employees may enroll as of the first day of the calendar month following their 61st day of eligibility and coverage terminates on the last day of employment.

401(k)

The Company offers a 401k savings plan to eligible employees according to the terms of the plan. An employee's contribution is tax deferred, and the Company also matches a portion of that contribution.

Eligibility requirements for all part time and full-time employees are:

- ☑ Upon being hired, must be 18 years of age.

Enrollment and change periods occur quarterly each year (in January, April, July, and October). Please watch the bulletin board for enrollment information and further communication about this benefit.

Speak with the Human Resource Department for all plan details, eligibility requirements, and the Company matching program.

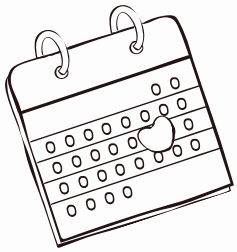
Plan design, contribution levels and vendors are subject to change at the discretion of management. Employees will be informed of any changes in advance.



Questions or Concerns? Reach out to the Benefits Department Today!

Company Holiday

The Company recognizes the following paid holidays each year:



- ✓ **New Year's Day**
- ✓ **Memorial Day**
- ✓ **Independence Day**
- ✓ **Labor Day**
- ✓ **Thanksgiving Day**
- ✓ **Day after Thanksgiving**
- ✓ **Christmas Day**

Should a holiday fall on a weekend, the Company will follow the Bank Holidays.

Time off may be granted to employees who desire to observe a religious holiday that is not recognized by the Company

Vacation

The Company provides paid time off from work for rest and relaxation.

Requesting Vacation Time Off

All requests for vacation time must be submitted through UKG for your manager's approval and submitted to Payroll by 11:59pm on Saturday before the pay period ends. Please provide advance notice of a vacation request. The Company reserves the right to deny requests based on business needs.

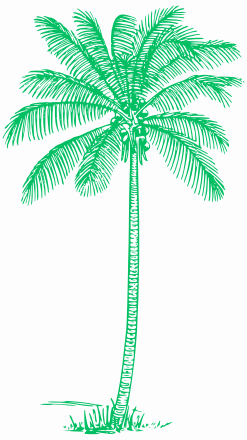
Manager Responsibility

Managers must follow-up with their employees for vacation requests in a timely manner. Managers must check and approve the employees timecards before payroll period is closed.

Vacation Grants

Accrual begins on your anniversary date.

- Vacation accrues from first day of employment.
  - Accrued at a rate of 1.539 hours per week worked to a yearly maximum of 80 hours.
- Vacation accrual after Five (5) years of continuous service. Accrual begins on anniversary date.
  - Accrued at a rate of 2.308 hours per week worked to a yearly maximum of 120 hours.
- Vacation accrual after Ten (10) years of continuous service. Accrual begins on anniversary date.
  - Accrued at a rate of 3.077 hours per week worked to a yearly maximum of 160 hours.



Vacation Carryover

- Employees may take only vacation time that they have earned. If they wish to take additional time off it must be unpaid and approved by senior management.
- Employees may only take one (1) week of vacation, at a time unless approved by senior management.
- Vacation hours do not count when computing overtime.
- Vacation time is not accrued while on a leave of absence.
- Employees may not receive vacation pay in lieu of vacation time.
- This benefit is subject to change at the sole discretion of management. If the policy should change, employees will be notified in advance.
- Vacation may be carried over to the next year, up to a maximum of 40 hours. However this time must be used by June 30, or it will be forfeited.

Payout Accrued Unused Vacation Upon Separation

If a Massachusetts employees separates from the company, involuntarily or voluntarily, and they have accrued, but unused vacation, that time will be paid out, at their normal hourly rate in their final paycheck.

Personal Days

All corporate office full-time, regular employees are entitled to three personal days beginning January 1 of each calendar year. If an employee is hired before March 31, they will receive three (3) personal days for the remainder of the calendar year. If an employee is hired between April 1 and June 30, they will receive two (2) personal days for the remainder of the calendar year. If a new employee is hired between July 1 and September 30 they will receive one (1) personal day for the remainder of the calendar year. If an employee starts after October 1 they will not receive any personal days for the remainder of the calendar year. As of January 1 of the following calendar year, however, he or she will be eligible for three (3) personal days to be used in that calendar year.

Employees must notify their manager one week prior when scheduling to take personal days. Employees are not paid for unused days upon separation of employment, and unused personal days do not carry over from year to year.

Sick Time

All Massachusetts employees will be eligible to earn and use up to 40 hours of paid sick time per calendar year. The law applies to exempt, non-exempt, full-time, part-time, and temporary employees.

Purpose:

- To care for the employee's child, spouse, parent, or parent of a spouse, who is suffering from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care.
- To care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care.
- To attend a routine medical appointment or a routine medical appointment for the employee's child, spouse, parent, or parent of spouse.
- To address the psychological, physical, or legal effects of domestic violence; or
- To travel to and from an appointment, a pharmacy, or other location related to the purpose for which the time was taken.

Sick time will begin accruing on the first date of work at the rate of one (1) hour for every 30 hours worked including overtime. Employees may begin to use any accrued earned sick time 90 days following their first date of actual work, regardless of the number of days worked during the 90-day period.

Employees exempt from overtime shall be assumed to work 40 hours in each work week for purposes of earned sick time accrual unless their jobs specify a lower number of hours per week, such as salaried part-time employees. In such cases, earned sick time shall accrue based on that specified number of hours per week.

Employees will accrue earned sick time only on hours worked, not on hours paid when not working such as vacation, sick leave, leaves of absence, etc.

Once employees have accrued 40 hours of earned sick time during the benefit year (benefit year is the same as calendar year January 1- December 31), they do not continue to accrue more hours of earned sick time regardless of the additional hours they work. At the end of the benefit year, an employee may rollover up to 40 hours of unused earned sick time to the next benefit year. However, the maximum accrued hours an employee can use in any benefit year is 40 hours.

The smallest amount of sick time an employee can use is one (1) hour, but sick time can be paid in increments of .25 of an hour following the first hour used. Employees may use up to 40 hours of earned sick time per benefit year. Earned paid sick time for hourly employees is paid at the employee's regular hourly rate. The company does not pay employees for sick time earned and unused either during or at the end of employment. Notice required for unforeseeable absences is what is reasonable under the circumstances. Employees must notify their manager by telephone as much in advance as possible if they are unable to report to work for any reason.

An employee may not use earned sick time if the employee is not scheduled to be at work during the period of use. Earned sick time may not be used as an excuse to be late for work without an authorized purpose. An employee may not accept specific shifts with the intention of calling out sick for all or part of that shift. A seven (7) day notice is required for any foreseeable pre-scheduled use of accrued sick time (doctor appointments, medical testing etc.). The employee must notify their manager of their intent to use accrued sick time in the event of a qualifying absence. The employee must provide signed documentation using the form provided by their manager to verify that they have used earned sick time.

Sick Time (Continued)

The company requires certification of the need for sick time if an employee uses sick time for more than 24 consecutively scheduled work hours; exceeds three (3) consecutive days on which the employee was scheduled to work; occurs within two (2) weeks prior to an employee's final scheduled day of work before termination of employment, except in the case of temporary employees (i.e. "temp workers"); occurs after four (4) unforeseeable and undocumented absences within a three (3)-month period; or for employees aged 17 and under, occurs after three (3) unforeseeable and undocumented absences within a three (3)-month period.

If an employee fails to comply without reasonable justification with the documentation requirements as described in 940 CMR 33.06, the company will recoup the sum paid for earned sick time from future pay, as an overpayment.
The company may require an employee to provide a fitness-for-duty certification, a work release, or other documentation from a medical provider before an employee returns to work after an absence during which earned sick time was used.
If an employee abuses the sick time policy by engaging in an activity that is not consistent with allowable purposes for earned sick time, the Company may discipline the employee for misuse of this sick leave policy.

Requesting Sick Time

The Company will not use your earned sick time without your authorization. If you call out for a scheduled shift and want to use your available sick time to be compensated for that time, you must notify your manager by Saturday midnight, which is the end of the payroll period.

How to indicate you want to use your earned sick time:

- You can sign into the UKG App on your phone.
- You can sign into UKG online and submit a request through the web portal.
- You can indicate this from the time clock

If an employee fails to report their sick time by the end of the pay period, payment will be delayed until the following pay period.

Leave of Absence

Family Medical Leave Act

Under the Family and Medical Leave Act of 1993, as amended (FMLA), employees may be eligible for a period of job-protected unpaid leave for certain family and medical reasons as described below. The provisions below provide an overview of employees' rights and responsibilities under the FMLA as well as the Company's own policies regarding FMLA Leave.

General Eligibility

To be eligible for FMLA Leave under this Policy, an employee must have worked at the Company for at least 12 months and must have worked at least 1,250 hours during the 12-month period prior to the commencement date of any leave requested under this Policy. Eligibility will be determined as of the date the leave commences. Employees who work at a site at which fewer than 50 employees are employed within a 75-mile radius are not eligible for leave under this policy. When a request for FMLA is made, the Company will advise of the employee's eligibility and the employee's rights and responsibilities.



Types and Duration of Leaves

The types of FMLA Leave are: Bonding Leave; Serious Health Condition Leave; Leave to care for a family member with a serious health condition; Active-Duty Leave.

An employee may be eligible for up to 12 weeks of unpaid leave during a rolling 12-month period (measured backward from the date an employee uses FMLA leave) for the following reasons:

- For the birth of the employee's child and to bond with the child; or for placement through adoption or foster care and to bond with the newly placed child. Such leave must be concluded no later than 12 months after the birth or placement of the child with the employee.
- To care for an immediate family member (spouse, child under 18 years old or a child 18 and over who is incapable of self-care because of a disability, or parent) with a serious health condition.
- Due to a serious health condition which renders the employee unable to perform the functions of their job; or
- Due to any qualifying exigency arising out of the fact that an employee's spouse, child (of any age), or parent, who is serving in any branch of the military (including the National Guard or Reserves), has been deployed or called to active duty in a foreign country ("Active-Duty Leave").

Leave of Absence (Continued)

Military Caregiver Leave

An employee also may be eligible for Military Caregiver Leave under the FMLA to care for a spouse, child (of any age), parent, or next of kin who is: (a) a current member of the Armed Forces, including the National Guard or Reserves, and who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness, which is incurred in the line of duty (or for a pre-existing injury or illness which is aggravated in the line of duty) and that renders the service member medically unfit to perform the duties of their office, grade, rank or rating, or (b) a veteran who was a member of any branch of the Armed Forces, including the National Guard or Reserves, and who is undergoing medical treatment, recuperation, or therapy, for a serious injury or illness that occurred in the line of duty (or for a pre-existing injury or illness which was aggravated in the line of duty) at any time within five (5) years preceding the treatment, recuperation or therapy.

A covered veteran incurs a serious illness or injury for purposes of this paragraph when one of the following occurs:

- The injury or illness makes them medically unfit to perform the duties of their office, grade, rank, or rating.
- It causes the service member to have a Department of Veterans Affairs ("VA") Service Disability Rating at 50% or greater.
- It is a mental or physical condition that substantially impairs their ability to obtain gainful employment. The VA enrolls the employee in the Department of Veteran Affairs Program of Comprehensive Assistance for Family Caregivers.

Eligible employees are entitled to a total of 26 weeks of unpaid Military Caregiver Leave during a single 12-month period. This single 12-month period begins on the first day an eligible employee takes Military Caregiver Leave (as long as it is within five (5) years of the covered service member's active duty) and ends 12 months after that date. Military Caregiver Leave applies on a per-covered service member, per-injury basis, so that an employee may be eligible to take more than one 26-week period of Military Caregiver Leave, but no more than 26 weeks of leave may be taken during any one 12-month period.

An eligible employee is entitled to a combined total of 26 work weeks of leave for all FMLA qualifying reasons during the single 12-month period described above. For example, if an employee takes 10 weeks of FMLA leave due to their own serious health condition, the employee may take only 16 weeks of Military Caregiver Leave during that same 12-month period.

When Spouses Work Together

If both spouses are employed by the Company and are eligible for leave under this policy, they are eligible for a combined total of 12 weeks of leave within the applicable 12-month period when the leave is due to the birth or placement of a child or to care for a parent who has a serious health condition, or a combined total of 26 weeks within the applicable 12-month period when the leave is to care for a child or parent under the Military Caregiver Leave. However, in no event shall the spouses take more than a combined total of 12 weeks of leave within the applicable 12-month period for the birth or placement of a child or to care for a parent who has a serious health condition.

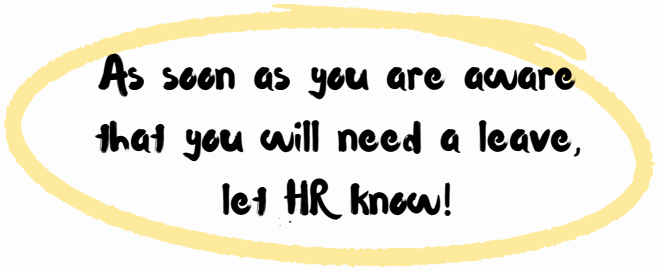
Notice of Need for FMLA Leave

An employee who wants to take FMLA leave must follow normal call-in policies and notify their manager as soon as they are aware of the need for leave. Failure to adhere to normal company call-in procedures can result in discipline, as with any other type of leave.

Upon notifying a manager, the employee will be required, thereafter, to contact Human Resources to complete a request for leave and other applicable paperwork.

To avoid a delay in FMLA protection, the employee must give notice as soon as possible and practicable under the circumstances to advise the person receiving the request that FMLA may apply. If an employee fails to give the required notice with no reasonable excuse, FMLA coverage may be delayed. This can result in discipline for absences taken prior to FMLA coverage commencing.

Employees should make every reasonable effort to schedule foreseeable medical treatments so as not to disrupt the ongoing operations of the Company.



Substitution of Paid Leave for Unpaid FMLA Leave

Employees must concurrently exhaust any short-term disability benefits, workers compensation benefits, accrued vacation time, or any other form of applicable paid leave for FMLA leave. All substituted paid leave that is being concurrently exhausted will be counted against an eligible employee's FMLA leave entitlement.

Leave of Absence (Continued)

Intermittent FMLA Leave

Intermittent or reduced schedule leave is leave at varying times for the same qualifying condition. Intermittent leave or reduced schedule leave may be available if the need for leave is due to an employee's serious health condition or an employee's immediate family member's serious health condition and when the need for intermittent or reduced schedule leave is certified by a health care provider. Intermittent or reduced schedule leave is not available for the birth or placement of a child for adoption or foster care unless the Company agrees. Military Caregiver Leave may be taken intermittently or on a reduced leave schedule when medically necessary. Active-Duty Leave may also be taken on an intermittent or reduced leave schedule.
The Company may require employees taking foreseeable intermittent or reduced schedule leaves to transfer temporarily to an alternative position for which the employee is qualified and which better accommodates the employee's leave schedule. Pay and shifts would not be affected by a change to an alternate position. Time worked in the alternate position would not count towards the employee's FMLA leave entitlement.

Documentation Supporting FMLA Leave

An employee requesting leave for a serious health condition must provide a completed FMLA Certification of Health Care Provider Form supporting the need for the leave. A request for reasonable documentation of family relationship verifying the legitimacy of a request for FMLA leave may also be required.

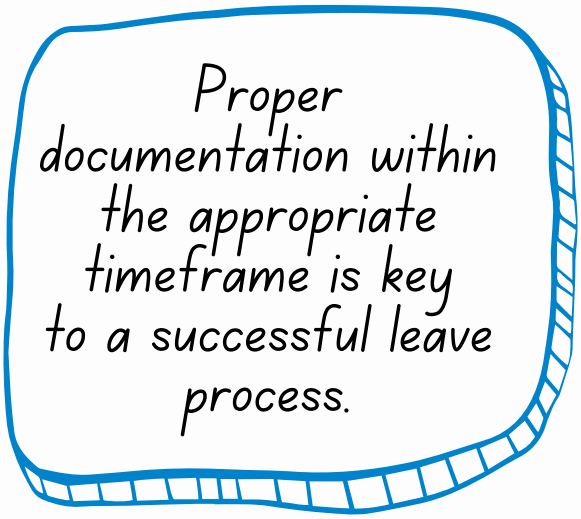
The employee will have 15 days in which to return a completed Certification form following the Company's request for the certification. If the employee fails to provide timely certification after being required to do so, covered leave may be delayed moving forward until the certification form is finally submitted. Absences counted against the employee for a late certification will not be reversed absent exceptional circumstances. If an employee never returns the completed form, the FMLA leave will be denied, and the absences will be unprotected. If the Certification form is incomplete or insufficient, an employee will be given written notification of the information needed and will be given a period of seven (7) days to provide the necessary information.

In some circumstances, a second opinion, at the expense of the Company, related to the health condition may be required. If the original certification and the second opinion differ, a third opinion, at the expense of the Company, may be required. The opinion of the third health care provider, which the Company and the employee jointly select, will be the final and binding decision.

A request for Active-Duty Leave must be supported by the Certification of Qualifying Exigency for Military Family Leave form as well as appropriate documentation, including the covered military member's active-duty orders.

A request for Military Caregiver Leave must be supported by the Certification for Serious Injury or Illness of Covered Servicemember form or Certification for Serious Injury or Illness of a Veteran for Military Caregiver Leave form as well as any necessary supporting documentation.

Once the Company has received a complete and sufficient certification form from the employee, the Company will advise the employee whether they have been approved or denied FMLA leave and, if possible, will advise how much FMLA leave will be used.



Recertification

In the following circumstances, the Company may, in its sole discretion, require recertification of the qualifying reason for FMLA: (a) where the employee needs more leave than the original certification justified; (b) where circumstances and facts cast doubt on the employee's need for FMLA; or (c) when the need for FMLA extends beyond six (6) calendar months. In these situations, the employee will have 15 days in which to provide a completed Recertification form.

Leave of Absence (Continued)

Restoration to Position and Benefits

Healthcare benefits, to the extent an employee is receiving them prior to taking leave, will be maintained while an employee is on FMLA, subject to the payment of premiums explained in this paragraph. For all other benefits, they will be maintained similarly to others on similar forms of leave (paid/unpaid). Employees on paid FMLA (because they may be concurrently exhausting a paid leave benefit) will continue to have their premium payments deducted from their paycheck as if they were on non-FMLA paid leave. Employees on an unpaid FMLA leave (for which no paid leave is substituted or after all paid leave has been exhausted) will need to maintain the benefits they accrued prior to commencement of the leave by making premium payments. If the payment is not received on the due date or thereafter, the Company will provide the employee written notice of non-payment and provide 15 days to make the payment. If the payment is not made within the 15-day window, and at least 30 days have passed from the due date, then coverage under the benefit plan will lapse, retroactively to the original due date.

Employees are permitted to return to whatever position they would have held had they not taken FMLA leave. Generally, this means employees returning from FMLA leave within 12 weeks will be returned to the job position that they held when they went on leave, or a substantially similar one. If the employee would have lost their position even if they had not taken the leave, then there exists no reinstatement right. For example, if the employee's position is eliminated because of a reduction in force, then no reinstatement right exists.

If an eligible employee fails to pay their portion of the required premium payments for benefit coverage, and the Company elects to pay the employee's portion of premium payments to keep benefit coverage in effect during a period of paid or unpaid FMLA leave for medical and dental benefits, and/or a period of unpaid FMLA leave for other benefits, the Company may recover the amount of the premium payment from the employee regardless of whether the employee returns to work. The Company may recover its own share of the premiums paid for maintaining an employee's medical and dental benefit coverage during any period of unpaid FMLA leave if the employee fails to return from leave after entitlement has expired, provided the employee's failure to return to work is due to a reason other than the continuation, recurrence, or onset of a serious health condition related to the qualifying reason the employee took FMLA leave.

Return to Work

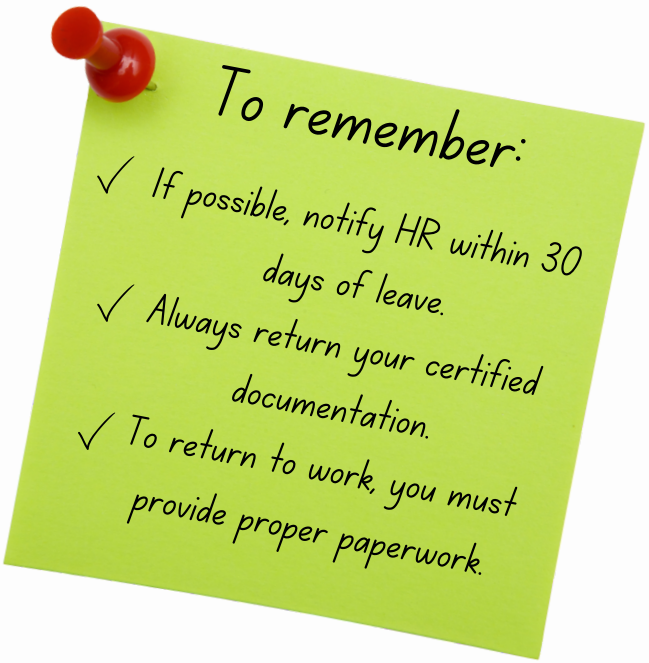
Employees on FMLA leave must periodically inform the Human Resources Department of their status and intent to return to work while on FMLA leave. Employees returning from FMLA leave must be able to assume all the essential functions of their jobs upon return. The Company will provide time for the employee to learn of any changes or new technology implementations. As a condition to restoring an employee whose leave was based on the employee's own serious health condition, the employee must provide certification from the employee's health care provider stating that the employee is able to resume work. This return-to-work statement is required for all serious health conditions unless the employee has previously provided one for that condition within the past year. If safety issues exist, the Company may require a return-to-work statement every thirty days.

Failure to Return from Leave

Unless required otherwise by law an employee granted a leave of absence under these provisions who fails to return to work upon expiration of the leave will no longer have protected absences. Further absences would count against the attendance policy.

Interaction with State Leave Laws

Certain states require employers to provide greater or different job-protected leave. When applicable, the Company complies with all such leave laws. When leave provided under one of these laws is covered under the federal FMLA, it also shall count toward the employee's federal FMLA entitlement and as FMLA Leave under this Policy. These leave laws vary by state. See your location's state-specific policies for additional information.



Leave of Absence (Continued)

Active-Duty Military Leave –USERRA

Employees may be entitled to certain rights and benefits, and may have certain obligations, related to service in the uniformed services pursuant to the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA") or related state laws. It is the Company's intent to comply with the requirements in USERRA and similar state laws with respect to leaves of absence, continuation of health coverage, reemployment, disabilities incurred or aggravated during uniformed service, non-discrimination and non-retaliation, and other covered matters. Specifically, the Company will not deny employment, reemployment, retention in employment, promotion, or any benefit of employment to an individual due to uniformed service, and will not tolerate discrimination or retaliation due to uniformed service.

Employees should notify their \manager or Human Resources of any need for leave to perform service in the uniformed services as far in advance as possible, preferably at least 30 days in advance and in writing where feasible. Employees are asked to provide a copy of applicable orders, training calendar, and/or similar documentation, if possible, in time to ensure continued business operations during absences. Employees will be granted unpaid leaves of absence for qualifying periods of uniformed service; however, employees may elect to use any applicable accrued but unused paid time off during such absences.

Barring any exception outlined in USERRA, employees will be eligible for reemployment after uniformed service if they return to work or apply for reinstatement within the following timeframes:

- For service of less than 31 days, at the beginning of the next regularly scheduled work period after release and subject to an eight (8) hour rest period.
- For service of more than 30 days but less than 181 days, within 14 days of release; or
- For service of more than 180 days, within 90 days of release.

To retain reinstatement rights, employees must provide appropriate advance notice and must not have been separated from uniformed service with a disqualifying discharge or under other than honorable conditions. Reinstatement rights are not guaranteed for any absence beyond five (5) years unless an exception stated in USERRA applies.

If employees meet these requirements, depending upon their length of service, employees will be reemployed in the position they would have had if continuously employed (i.e., the "escalator position"), the job they had upon commencement of uniformed service, a position comparable to the escalator or pre-service position, or the nearest approximation to the escalator position. Consistent with USERRA's "escalator principle," employees will be compensated upon reinstatement at the rate of pay they would have obtained with reasonable certainty if such employment had not been interrupted due to uniformed service. Likewise, employees will receive a reasonable amount of time to complete any training that they may have missed during uniformed service leave necessary to perform their job. In addition, health care coverage will begin immediately upon request at reemployment without a waiting period. Absent unusual circumstances (such as an extended period of uniformed service leave) or with respect to periods of service less than 31 days, reemployment will occur as soon as practical under the circumstances, typically within two (2) weeks of an employee's application.

Personal Leave of Absence

Your manager and Human Resources must approve all leaves of absence. At the sole discretion of the Company, an unpaid leave of absence may be granted depending on business needs and circumstances. Requesting a leave will not guarantee that it will be granted, and each case will be reviewed individually.

Employees who are absent on an unapproved leave will be subject to disciplinary action up to and including termination of employment.

When on an unpaid leave of absence, you may continue your health insurance benefits by providing the cost of the monthly premium to the Human Resources Department no later than the first of each month. Failure to pay the premium will result in loss of medical insurance benefits.

Personal leaves may not exceed 30 days in length.

If a Personal leave exceeds 30 days, is unexcused, or unapproved, then it will be considered job abandonment and a voluntary termination will be processed. The employee will have the opportunity to reapply for a position at a future date.
If you have questions, you may either contact your manager or the Human Resources Department for assistance.

Bereavement Leave

Our Company offers bereavement leave to provide time for mourning after the loss of an immediate family member. The use of Bereavement Leave is authorized by the employee's manager. An employee may take up to three (3) days' paid leave for a death of the immediate family. The immediate family includes spouse, child, mother, mother-in-law, father, father-in-law, sibling, stepfather, stepmother, stepchildren, grandparent or grandchild, or spouse's grandparent or grandchild. An employee may take up to one (1) day's paid leave for a death of an extended family member. The extended family includes brother-in-law, sister-in-law, son-in-law, daughter-in-law, aunt, uncle or other relative.

An employee may take up to four (4) hours of unpaid leave to attend a funeral.
The Company may require certification of the need for bereavement time. If additional time is needed, vacation or unpaid leave may be taken with the employee's manager's prior approval. Employees who are found to be misusing this policy will be subject to disciplinary action up to and including termination of employment.

Jury Duty Leave



Employees will be granted time off to serve on a jury without pay, unless mandated by state law. No employee will suffer any adverse action, discrimination, or retaliation for taking time to serve on a jury. Employees must provide a copy of their jury summons to Human Resources and return to work when their service is completed.

Massachusetts employees who are obligated to appear for jury service will be compensated for their missed hours at their regular rate of pay for the first three (3) days of jury service if such service is necessary. Employees needing to take leave for jury duty will be asked to provide appropriate documentation and must inform their manager as soon as they are aware of their dates of their service.

Massachusetts State Specific Leaves

Massachusetts Paid Family and Medical Leave ("PFMLA")

Under the Massachusetts Paid Family and Medical Leave Act ("PFMLA"), employees may be eligible for a period of paid, job-protected leave for certain family and medical reasons as described below. The provisions below provide an overview of employees' rights and responsibilities under the PFMLA as well as the Company's own policies regarding PFMLA Leave.

General Eligibility

All employees working in Massachusetts are eligible for paid family and medical leave under the Massachusetts Paid Family and Medical Leave Act ("PFMLA"), provided they have received wages that are equal to or greater than 30 times the weekly benefit amount available to them under 458 CMR 2.12 and not less than $4,700 over the last two quarters. This includes wages received from other employers during the past two quarters. Former employees may also be eligible for paid benefits, to the extent they have been separated from the Company for not more than 26 weeks at the start of their leave and have not found subsequent employment at the time their leave begins.

Entitlement

Eligible employees may take up to 26 weeks of job-protected PFMLA leave for certain family and medical reasons during a benefit year. The benefit year is calculated prospectively looking at the 52-week period beginning on the Sunday immediately preceding the first day of job-protected leave for the employee.

PFMLA leave may be taken for any one, or for a combination of, the following reasons:

- ✓ Up to 12 weeks of family leave: (a) to bond with a child during the first 12 months after the child's birth, adoption, or foster care placement; (b) for a qualifying exigency arising out of the fact that a family member is on active duty or has been notified of an impending call to active duty in the Armed Forces; or (c) to care for a covered family member who has a serious health condition.
- ✓ Up to 26 weeks of family leave to care for a family member who is a covered service member with a serious health condition.
- ✓ Up to 20 weeks of medical leave for their own serious health condition that makes them unable to perform one or more of the essential functions of their job.

Leave of Absence (Continued)

A covered family member includes the employee's spouse, domestic partner, child, parent, parent of a spouse or domestic partner, a person who stood in loco parentis when the employee was a minor child, grandchild, grandparent, or sibling.

A serious health condition is an illness, injury, impairment or physical or mental condition that involves: (a) inpatient care in a hospital, hospice, or residential medical facility; or (b) continuing treatment by a health care provider.

Qualifying exigencies may include caring for a military member's child or other family member of the military member on covered active duty, making financial or legal arrangements for the military member, attending counseling, attending military events or ceremonies, spending time with the military member during a rest and recuperation leave or following return from deployment, or planning following the death of the military member.

A covered servicemember is either: (a) a member of the Armed Forces, including a member of the National Guard or Reserves, who is: undergoing medical treatment, recuperation or therapy; otherwise in outpatient status; or is otherwise on the temporary disability retired list for a serious injury or illness that was incurred by the member in the line of duty on active duty in the Armed Forces, or a serious injury or illness that existed before the beginning of the member's active duty and was aggravated by service in the line of duty on active duty in the Armed Forces; or (b) a former member of the Armed Forces, including a former member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy for a serious injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces, or a serious injury or illness that existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces and manifested before or after the member was discharged or released from service.

Administration

Leave and benefits are administered by the Massachusetts Department of Family and Medical Leave (the "Department"). Although the Company provides wage income verification to the Department, all benefits determinations are made exclusively by the Department. The Department calculates weekly benefits as follows: (a) the portion of an employee's average weekly wage that is equal to or less than 50% of the state average weekly wage shall be replaced at a rate of 80%; and (b) the portion of an employee's average weekly wage that is more than 50% of the state average weekly wage shall be replaced at a rate of 50%, up to the applicable weekly benefit limits.

The first seven (7) calendar days of leave are unpaid by the Department, except for medical leave during a pregnancy or recovery from childbirth if supported by documentation by a health care provider that is immediately followed by family leave, in which case the seven-day waiting period for family leave will not be required. During any unpaid waiting period, employees may elect to use PTO to replace their regular income. Typically, employees will start receiving benefits from the Department not less than 14 days after the Department approves the leave and receipt of benefits, unless the Department approves benefits more than 14 days before the onset of eligibility to take leave.

Substitution of Department Benefits with Company Benefits

Employees may choose to use accrued PTO instead of the state paid benefit. If employees elect to make such a substitution, they shall not receive any benefits from the Department. Receipt of such benefits does not extend PFMLA leave entitlements, which will run concurrently with any Company-provided benefits.

Use of Leave

PFMLA leave is usually taken for a period of consecutive days, weeks, or months. However, employees also are entitled to take PFMLA leave intermittently or on a reduced leave schedule when medically necessary due to a serious health condition of the employee or family member. Qualifying exigencies leave also may be taken on an intermittent basis. Please note that the Department will not pay PFMLA benefits in increments of less than 15 minutes. In addition, the Department only permits employees to apply for payment of benefits associated with intermittent leave once they have eight (8) hours of accumulated leave time, except where more than 30 calendar days has lapsed since the employee initially took such leave.

The employee is required to work with the Company to create an agreed-upon intermittent or reduced leave schedule. Failure to comply with the agreed-upon schedule may result in discipline.

The use of intermittent leave will result in the proportional reduction of an employee's available allotment of leave. For example, if an employee normally works 40 hours per week and takes intermittent leave for 20 hours each week, then it will be counted as ½ a week of leave to be counted against the employee's leave entitlement.

Leave of Absence (Continued)

Employee Notice to the Company

To trigger PFMLA leave protections, employees must inform Human Resources of the need for leave and the anticipated timing and duration of the leave, if known. The employee notice must state:

- The anticipated start date of the leave,
- The anticipated length of the leave, and
- The individual's expected return date.

Employees must provide the Company at least 30 days' advance notice of the need to take PFMLA leave when the need is foreseeable. Such notice must be provided before employees apply to the Department. When 30 days' notice is not possible, or the approximate timing of the need for leave is not foreseeable, employees must provide the Company notice of the need for leave as soon as practicable.

When planning medical treatment, the employee must consult with the Company and make a reasonable effort to schedule treatment so as not to unduly disrupt the Company's operations. The employee must consult with the Company prior to the scheduling of treatment to work out a treatment schedule which best suits the needs of both the Company and the employee.

The Department may deny, or delay leave and benefits for employees who fail to give the Company at least 30 days' notice for foreseeable leave without a reasonable excuse for the delay, who apply to the Department before notifying their employer, or who otherwise fail to satisfy PFMLA notice obligations.

As soon as you are aware that you will need a leave, let HR know!

Employee Application to the Department

After providing notice to the Company (unless the need for leave is unforeseeable), employees should apply directly to the Department for leave and benefits. Employees are required to use the forms provided by the Department, and their application for benefits may not be processed unless the application for benefits includes all information necessary for the Department's review and processing. The Department requires the following information:

- Identifying information, such as Social Security Number or Individual Taxpayer Identification Number.
- The nature of the leave, whether family leave or medical leave.
- The starting date and expected duration of the leave.
- Whether the leave will be continuous or intermittent.
- The employer's name and identification number.
- Evidence that notice was provided to the employer in advance of the application for benefits, including the date notice was provided to the employer.
- Any denied, granted, or pending requests for leave for a qualifying reason from the employer during the last 12 months.
- An attestation regarding the family relationship in the form specified by the Department if the leave involves an application for family leave benefits; and
- A completed certification based on the type of leave in the form specific by the Department.

Employees may be required to provide additional specific information requested by the Department where reasonably necessary to review and process an application for benefits including, but not limited to, whether the employee will be receiving any other wage replacement. It is the employee's responsibility to provide the Department with timely, complete, and sufficient information, certifications or other documents supporting the need for leave.

Amendment or Extension of Leave Period and Paid Leave Benefits

If there is a change in relevant circumstances that would justify an extension, reduction, or other modification of the period of leave, the employee and Company must notify the Department within seven (7) calendar days of said change using the forms required by the Department. For extensions, specifically, the employee must make a request for extension at least 14 calendar days prior to the expiration of the original approved leave. The Department may consider late filed requests upon a showing of good cause by the employee. The request for extension must include:

- the reason for the extension.
- the requested duration of the extended leave.
- the date on which the covered individual provided notice for the request for extension to the employer; and
- a newly completed or updated health care certification supporting the need for leave.

Leave of Absence (Continued)

Job Benefits & Protection

During PFMLA leave, the Company will maintain health coverage under any employment-related health insurance on the same terms and conditions as if the employee had continued to work. If Company-provided benefits are used as a substitute to the Department's benefits, the Company will deduct the employee's portion of any applicable health plan premium as a regular payroll deduction. If the employee is not receiving any Company-provided benefits during the leave, the employee must plan with Human Resources prior to taking leave to pay their portion of any applicable health insurance premiums each month.

Unless otherwise provided by applicable law, upon return from PFMLA leave, employees will be restored to their original or equivalent positions with equivalent status, pay, benefits, length-of-service credit, and seniority as of the date of the leave. The use of PFMLA leave will not result in the loss of any employment benefits that accrued prior to the start of an employee's leave.

Return to Work/Fitness for Duty Medical Certifications

Unless notified otherwise, an employee returning to work from PFMLA leaves taken for their own serious health conditions must provide the Company with a medical certification confirming they are able to return to work and to perform the essential functions of their position, with or without reasonable accommodation. The Company may delay and/or deny job restoration until the employee provides return to work/fitness for duty certifications.

Interaction with Other Leave Policies

Leave taken pursuant to PFMLA will run concurrently with leave taken under other applicable state and federal leave laws, including without limitation the Massachusetts Parental Leave Act and the federal Family and Medical Leave Act of 1993, when the leave is for a qualified reason under those laws.

Questions and/or Complaints about PFMLA Leave

If you have questions regarding this PFMLA policy, please contact Human Resources. For questions about determinations by the Department on leave eligibility, entitlement, and/or benefits, please contact the Department directly. The Company is committed to complying with the PFMLA and, whenever necessary, shall interpret and apply this policy in a manner consistent with the PFMLA.

The PFMLA makes it unlawful for employers to retaliate, threaten to retaliate, or interfere with the exercise of any right provided under G.L. c. 175M. In addition, employers may not retaliate or threaten to retaliate against any person who has filed a complaint, has caused a complaint to be filed, has or will participate or testify in proceeding relating to a violation of G.L. c. 175M, or has given or is about to give information connected to a proceeding relating to a violation of G.L. c. 175M. If employees believe their PFMLA rights have been violated, they should contact Human Resources immediately. The Company will investigate any PFMLA complaints and take prompt and appropriate remedial action to address and/or remedy any PFMLA violation. Employees also may file PFMLA complaints with the Department alleging PFMLA violations.

Right to an Appeal

An employee who is denied leave pursuant to the PFMLA may submit an appeal to the Department. The appeal must be filed within ten (10) calendar days of receipt of the denial. The deadline may be extended by the Department upon a showing of circumstances beyond the employee's control. In addition, the employee is required to provide a complete copy of the request for appeal to the Company. Employees may request a hearing with the Department and a final decision will be issued by the Department affirming, modifying, or revoking the initial determination made by the Company.

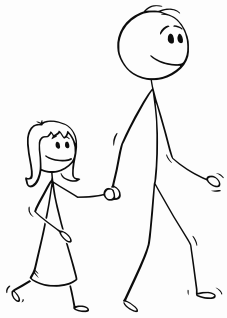
An employee aggrieved by the Department's final decision may further appeal by filing a complaint in district court for the county in the Commonwealth where the individual resides or was last employed. The complaint must be filed within 30 calendar days of the date the Department's final decision is received by the individual.

Massachusetts State National Guard and Reserve Duty Leave

Employees who are members of the U.S. Armed Forces reserves or an organized unit of any state's National Guard may take up to 17 days of unpaid leave per year for military drills, training, or other temporary duty under military authority. Provided the employee provides their manager or the Human Resources Department with reasonable advance notice of their departing and return dates, they're entitled to reinstatement to the same position they had prior to taking leave with the same status, pay, and seniority, including seniority that accrued during the period of absence. In addition, any employee absent for military training or state active duty will be entitled to the same reinstatement rights as provided under federal law (USERRA) as explained more fully above.

Active-Duty Leave is unpaid, but employees may use applicable accrued paid time off while on leave. An employee should notify their manager or the Human Resources Department as soon as they are aware of the need for Active-Duty Leave. The Company may require written documentation of the employee's military obligations.

Leave of Absence (Continued)



Massachusetts Parental Leave

Massachusetts employees who are not eligible for Family or Medical Leave under the FMLA or PFMLA may be eligible for a leave of absence for childbirth, adoption, or for the placement of a child pursuant to a court order under the Massachusetts Parental Leave Act (MPLA). Where an employee qualifies for leave under the MPLA and the FMLA and/or PFMLA, leave under these statutes will run concurrently.

Eligible employees are full-time employees who have been employed for at least three (3) months.
Employees are eligible for up to eight (8) weeks of unpaid leave for (a) giving birth, (b) caring for a newly placed child under the age of 18 or under the age of 23 if the child is mentally or physically disabled, or (c) for an intended or actual adoption.

The Parental Leave Act also provides that if any two employees of the same employer are the parents to the same child, those employees are only entitled to one aggregate period of eight (8) weeks of leave between them.

The employee who takes leave is generally entitled to be restored to their previous or similar position with the same status, pay, and seniority as when the leave period began. These protections apply only to leaves of up to eight (8) weeks. According to the MPLA, the law does not require that an employee be reinstated to a position when employees in similar positions with similar lengths of service and status have been laid off due to economic or other operating conditions. In these circumstances, the employee on leave is to be afforded the same preferential treatment in consideration for another position as they would have had at the time that their leave period began.

Leave under MPLA is unpaid, though employees may use applicable accrued paid time off while on leave.
To obtain a Leave of Absence Medical Certification Form, contact the Human Resources Department pursuant to the notification procedures under the federal FMLA provisions.

Massachusetts Small Necessities Leave

Massachusetts employees may take a total of up to 24 hours of Small Necessities Leave ("SNL") during any 12-month period (measured backwards from the effective date of the leave) to allow them to participate in certain family obligations. To be eligible, an employee must (a) have worked for the Company for at least 12 months and (b) have worked 1,250 hours or more in the preceding 12-month period.

An eligible employee may take SNL to: (a) participate in school activities directly related to the educational advancement of their child; (b) accompany their child to routine medical or dental appointments; or (c) to accompany an elderly relative (defined by Massachusetts law as an individual related by blood or marriage who is at least 60 years of age) to routine medical or dental appointments, or for other professional services related to the elderly relative's care.

SNL is unpaid, except to the extent that an employee has accrued but unused sick time or vacation time available, in which case such time shall be applied to the leave. SNL may be taken all at once, intermittently (in increments of an hour or greater), or through a reduced work schedule. An employee's absence from work for SNL shall be no greater than that necessary to accomplish the relevant task necessitating the leave.

An employee seeking SNL must provide at least seven (7) days' notice before taking SNL, if the need for leave is foreseeable; if the need for leave is not foreseeable, then the employee must provide as much notice as is practicable. The Company, in its discretion, may require from the employee certification of the need for any SNL.

Massachusetts Veterans and Memorial Day Leave

Any employee who is a veteran as defined under Massachusetts law may take a reasonable period of unpaid leave when scheduled to work on Memorial Day or Veterans Day to attend applicable remembrance exercises, parades, or services in the community where the employee resides. A veteran desiring time off shall notify their manager as soon as possible.

Massachusetts Voting Leave

In the event an employee does not have sufficient time outside of working hours to vote in a statewide election, the employee may take off enough working time to vote. This time should be taken at the beginning or end of the regular work schedule. Where possible, your manager should be notified at least two (2) days prior to the voting day.

Leave of Absence (Continued)

Massachusetts Domestic Violence Leave

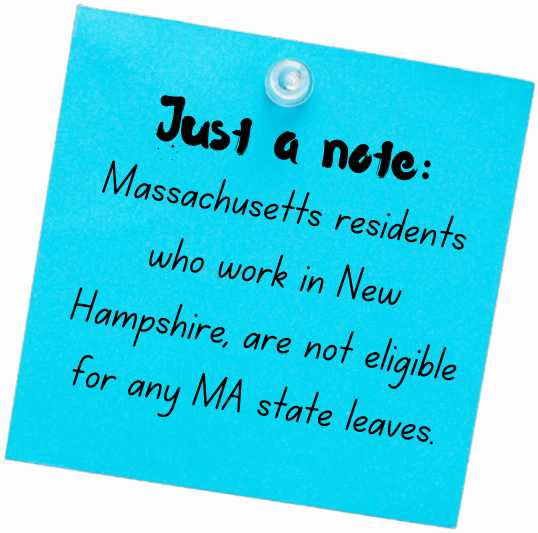
The Company is committed to the health and safety of our employees and their families. Should an employee or an employee's family member be a victim of domestic violence or abusive behavior, they are encouraged to communicate with the Human Resources Department about the situation. Employees are immediately eligible for this leave upon beginning employment.
An employee may take up to a maximum of 15 days of unpaid leave in a 12-month period, if either the employee or "covered family members" are the victim of abusive behaviors or must attend medical treatment, counseling, victim/legal services, child custody services etc.
For purposes of this policy, a family member includes not only legally married spouses but also:

- Persons "in a substantive dating or engagement relationship" AND who reside together.
- Persons having a child in common regardless of whether they have ever married or resided together.
- A parent, stepparent, child, stepchild, sibling, grandparent, or grandchild; or
- Persons in a guardianship relationship.

Employees are to use sick leave or vacation time to remain on paid status during a covered leave under this policy, and use of such vacation time will run concurrently with leave under this policy. If no vacation time is available, leave under this policy will be unpaid.
The Company requests that employees provide appropriate advance notice of this leave (as required by the current leave policy), unless there is an imminent danger to their immediate health and safety (in which case notification must be received within three (3) workdays, that the leave was taken or is being taken for reasons covered by this policy). If an employee takes this leave, they must provide documentation evidencing that they or a family member have been a victim of domestic violence or abusive behavior within 30 days (reasonable amount of time) of the leave request. Such forms of documentation may include:

- A court issued protective order.
- An official document from a court, provider, or public agency.
- A police report or statement of a victim or witness provided to the police.
- Official legal documentation attesting to perpetrator's guilt.
- Medical documentation of treatment for the abusive behavior.
- A sworn statement from the employee attesting to being a victim of abusive behavior.
- A sworn statement from a professional who has assisted the employee or the employee's family, for example, a counselor, a social worker, or a member of the clergy.

Alleged perpetrators of domestic violence are not entitled to leave under this statute.
A form will be completed to document and keep track of the use of this leave. Employees with questions at any time as to how this policy applies to them should not hesitate to contact the Human Resources Department.



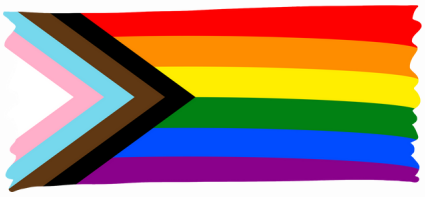
Equal Employment Opportunity Policy

It is a fundamental policy of the Company not to discriminate based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, handicap or disability, genetic information, citizenship, veteran or military status, or any other protected classification under state law with respect to recruitment, hiring, training, promotion and other terms and conditions of employment. It is the policy of the Company to base employment decisions solely upon an individual's qualifications relating to the requirements of the position for which the individual is being considered.

It is also the policy of the Company to recruit, hire, and promote the best qualified persons for all jobs without regard to race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, handicap or disability, genetic information, citizenship, veteran or military status, or any other protected classification under state law. It is the policy of the Company to ensure that all personnel actions such as compensation, benefits, transfers, layoffs, Company-sponsored training, promotions, terminations, and disciplinary actions are applied equally.

Equal Employment Opportunity Policy (continued)

In addition to those categories protected under federal law (race, color, religion, sex, national origin, age, handicap or disability, genetic information, citizenship, veteran, or military status), the Company also does not engage in wrongful discrimination under Massachusetts law due to an employee's sexual orientation, marital status, gender identity or arrest record.



Cultural Diversity and Identity

The Company is committed to creating and preserving a culture of diversity and inclusion. Our employees and the guests that we serve are members of a multicultural, multifaceted community that includes every gender, age, culture, sexual orientation, race, religion, and socioeconomic status. We embrace the diversity of backgrounds and perspectives of our employees and appreciate their talent, innovation, creativity, and contributions.

We do not discriminate based on gender identity or expression. We believe that providing a work environment based on respect, trust, and collaboration creates an exceptional employee experience where employees can bring their whole selves to work and thrive in their careers. Transgender is a broad umbrella term for people whose gender identity, expression or behavior is different from that typically associated with their assigned sex at birth. This includes people who socially and medically transition. The Company has certain best practices in place to support employees who are transitioning or who plan to transition, and education, training and support available for their managers and coworkers. If an employee is transitioning or planning to transition, or if a manager is aware of an employee who is transitioning or planning to transition, inform the Human Resources department as soon as possible.

All employees have a responsibility to treat coworkers and guests with dignity and respect and are expected to engage in conduct in the workplace that reflects this commitment to inclusion. If an employee believes that they are the subject of discrimination, they should reach out to Human Resources immediately. Employees who are found to have engaged in inappropriate conduct or behavior as it relates to this policy are subject to disciplinary action, up to and including termination.

Harassment and Notice of Non-Discrimination

The Company encourages a workplace free of discrimination, harassment, and/or inappropriate treatment of any employee, vendor or guest because of any person's race, sex (including pregnancy, sexual orientation, or gender identity), color, creed, religion, age, national origin, veteran or military status, disability, or any other category protected under federal, state, or local law. To be unlawful, conduct must be sufficiently serious that it unreasonably interferes with an employee's ability to work. The Company does not, however, condone or tolerate any inappropriate conduct, whether by employees or non-employees, based on a person's race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, handicap or disability, genetic information, citizenship, veteran or military status, or any other protected classification under state law.

Harassing conduct may include, but is not limited to:

- Ethnic, racial, religious, age, disability or sex-related jokes, epithets, stereotypes, or slurs.
- Foul or abusive language.
- Offensive graffiti, cartoons, or posters.
- Insulting or derogatory nicknames.
- Deliberately misgendering someone or deliberately using a name or pronouns that do not correspond with the person's gender identity.
- Mimicking another.
- Starting or spreading rumors.
- Teasing about religious or cultural observances, retirement, age, ability to learn, or absenteeism.
- Threatening or offensive mail, email, voicemail, or messages.
- Sharing yours or other's inappropriate videos, social media posts, memes, etc.

The Company also recognizes the fundamental importance of the open and free exchange of ideas and opinion. It recognizes that conflicts may arise between individuals' desire to express their opinions and the right of individuals to be free from harassment. We also recognize that every act that might be offensive to an individual or a group is not necessarily a violation of the law or of this policy.

Sexual Harassment

The company prohibits any form of sexual harassment or discrimination based on sex and implementing regulations through employee guidelines. The company is committed to providing employees and guests an environment and workplace free of inappropriate comments or conduct of a sexual nature. Prohibited sexual harassment may include, but is not limited to:

- Unsolicited and unwelcome comments or conduct of a sexual nature or that is demeaning to anyone as part of a group (for example, offensive or vulgar jokes, name-calling, comments about one's body or sex life, or stereotyping based on a person's sex).
- Unwelcome and unwanted sexual jokes, language, gestures, epithets, innuendoes, advances, or propositions; sexually oriented "kidding," "teasing" or "practical jokes."
- Unsolicited and unwelcome demands or requests, implicit or explicit, for sexual favors or sexual encounters.
- Sexually oriented propositions, slurs, suggestions, or questions.
- Stalking.
- Persistent, unsolicited, and unwelcome demands or requests, implicit or explicit, for social encounters.
- Written or verbal abuse of a sexual nature, including, for example, using sexually degrading or vulgar words to describe an individual.
- The display of sexually suggestive or revealing objects, other material or offensive pictures, electronic communications, or photographs.
- Unwelcome and unsolicited information about another's sexual prowess, activities, deficiencies, or sexual orientation.
- Asking questions or commenting about another's sexual activity or making unwelcome sexual advances or expressed or implied requests for sexual activity.
- Offensive or inappropriate behavior targeted at only one sex, even if the content of the conduct or comments is not sexual.
- Unwelcome physical contact, such as patting, pinching, touching, leering, ogling, whistling, indecent exposure, brushing against the body, or suggestive, insulting, or obscene comments or physical gestures.

Complaint Procedures

If an employee experiences any job-related harassment or have a related complaint, they should promptly report the matter to their manager or the Human Resources Department. The Company will undertake an investigation ensuring confidentiality to the greatest possible extent.

The Company expressly prohibits any form of retaliatory action against any employee availing themselves of the benefits of this procedure. Retaliation in the workplace may be expressed in a variety of ways. It is in general defined as any kind of negative action against a current or former employee that takes the form of punishment, and creates a hostile, threatening or uncomfortable environment because of their reported complaint. Retaliation is a violation of this policy and may result in discipline, up to and including termination. No employee will be discriminated against, or discharged, because of a good faith bringing or assisting in the investigation of sexual or other unlawful harassment.

If any of our employees believes that they have been subjected to harassment, the employee has the right to file a formal complaint. This may be done in writing or orally. If an employee would like to file a complaint, they may do so by contacting a manager, or the Human Resources Department at: 3 Pluff Avenue, North Reading, MA 01864: (978) 898-1201.

In addition to the above, if an employee believe they have been subjected to harassment, they may file a formal complaint with the government agencies set forth below. Using the Company complaint process does not prohibit them from filing a complaint with these agencies. The agencies have a short time period for filing a claim (usually 300 days).

The following agencies are charged with investigating claims of unlawful discrimination, harassment, and retaliation in Massachusetts. In addition to the reporting procedure provided in the Handbook, employees may also contact the following directly:

The United States Equal Employment Opportunity Commission ("EEOC")
1 Congress Street - 10th Floor
Boston, MA 02114
(617) 565-3200

Springfield Office:
424 Dwight Street, Rm. 220
Springfield, MA 01103
(413) 739-2145

Equal Employment Opportunity Commission
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
(800) 669-4000

The Massachusetts Commission Against Discrimination (MCAD)
Boston Office:
One Ashburton Place - Rm. 601
Boston, MA 02108
(617) 727-3990

Complaint Procedures (Continued)

Remedial Action

The Company will promptly and thoroughly investigate any complaint as it arises and will take appropriate action. Disciplinary action, up to and including termination of employment, will be taken against any employee engaging in any act in violation of this policy.

Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Act Amendments Act, known as the ADAAA, are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that, when needed, provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of the Company to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC) and counterpart state agencies. Furthermore, it is our Company policy not to discriminate against qualified individuals with disabilities regarding application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions, and privileges of employment.

The Company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to the Company. Contact the Human Resource Department with any questions or requests for accommodation.

Request for a Reasonable Accommodation

Employees with a disability, who believe they need a reasonable accommodation to perform the essential functions of their job, should contact the Human Resource Department. The Company encourages individuals with disabilities to come forward and request reasonable accommodation.

Procedure for Requesting an Accommodation

On receipt of an accommodation request, a member of the Human Resources Department and the employee's manager will meet with the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that the Company might make to help overcome those limitations.



The Company will determine the feasibility of the requested accommodation considering various factors, including, but not limited to, the nature and cost of the accommodation, including its impact on the ability of other employees to perform their duties and on our ability to conduct business.

An employee or job applicant who has questions regarding this policy or believes that they have been discriminated against based on a disability should notify the Human Resources Department. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

Based Upon a Physical or Mental Impairment

If an employee requires an accommodation due to a physical or mental impairment, please contact the Human Resources Department. The Company will work with the employee to help assess whether the impairment can be reasonably accommodated, considering the Company's business needs, resources, the job description, and other relevant factors.

The goal is trying to identify a reasonable accommodation that will enable all employees to perform the essential functions of their job or those of an available, vacant position for which the employee qualifies, without imposing an undue hardship on the Company. Therefore, the Company may ask for additional, supporting medical information or documentation from the employee's health care provider to assess an accommodation request.

Based Upon Sincerely Held Religious Beliefs

If an employee requires an accommodation for a sincerely held religious practice, please contact the Human Resources Department. The Company will work with the employee to help assess whether the request can be reasonably accommodated, considering the Company's business needs, resources, job description, and the other relevant factors. If the request imposes an undue hardship on the Company, the request for accommodation may not be provided.

Cooperation

Regardless of whether an employee's accommodation request is based upon an impairment or religious practice, they have an obligation to assist the Company in assessing the reasonableness of their request. Failure to provide requested information or documents requested by the Company to assess their request may lead to that request for an accommodation being delayed or denied.

Progressive Discipline Process

The Company's progressive discipline policy and procedures are designed to provide a structured corrective action process to address the remedy of the situations where an employee demonstrates unacceptable conduct and/or performance.
Outlined below are the steps of the progressive discipline policy and procedures. The Company reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling, or training; the employee's work record; and the impact the conduct and performance issues have on the organization. Each incident which may require disciplinary action will be examined carefully to ensure verification of facts and consistent application of corrective measures.

Further, whenever reasonably feasible, an effort will be made to make certain the employee understands the rule that is involved, why the behavior is inappropriate or unacceptable, and specific changes which must be made to bring the employee's conduct or performance to an acceptable level. The progressive discipline process allows the employee to see the results of their actions if the problem persists, and encourages the employee to develop good self-discipline habits to make further imposed discipline unnecessary.

Progressive discipline is not applicable in every instance where disciplinary action is warranted, and whether or not progressive discipline is utilized is within management's discretion. For example, if an employee's violation of work rules or policies involves gross misconduct (such as actions which involve the violation of state or federal laws, actions involving workplace violence, public intoxication and/or disorderly conduct, etc.), the employee may not be eligible for progressive discipline and instead will be subject to more serious disciplinary action, up to and including immediate termination.

Actions requiring discipline and the progression of disciplinary steps which will be followed may vary at the sole discretion of the Company and will not necessarily be limited to those actions listed in this Handbook. The Company will normally adhere to the following progressive disciplinary process:

Performance Improvement Plan

The Performance Improvement Plan (PIP) is designed to facilitate constructive discussion between a staff member and their manager and to clarify the work performance to be improved.

It is implemented, at the discretion of the manager, when it becomes necessary to help an employee improve their performance. The manager, with input from the affected employee, develops an improvement plan; the purpose of the activities outlined is to help the employee to attain the desired level of performance.

The expectation of the PIP is to enable the manager and employee to communicate with a higher degree of clarity about specific expectations. In general, people who are performing their jobs effectively, and meeting the expectations, will not need a PIP.
In all cases, it is recommended that the manager's supervisor and the Human Resources department review the plan. This will ensure consistent and fair treatment of employees across the Company. The manager will monitor and provide feedback to the employee regarding their performance on the PIP and may take additional disciplinary action, if warranted, through the organization's Progressive Discipline Process.

The manager should review the following items with the employee:

Progressive Discipline Process (Continued)

Performance Improvement Plan (Continued)

- Provide specific examples of the performance which needs to be improved.
- Set the performance expectation and the level in which it is to be performed on a consistent basis.
- Identify and specify the support and resources they will provide to assist the employee.
- Communicate the plan for providing feedback to the employee. Specify meeting times, with whom and how often.
- Specify the measurements that will be considered in the evaluating progress.
- Specify possible consequences if performance standards are not met.
- Provide sources of additional information such as the Employee Handbook.

Verbal Warnings

An employee will be given a verbal warning when they engage in problematic behavior. As the first step in the progressive discipline process, a verbal warning is meant to alert the employee that a problem may exist or that one has been identified which must be addressed.

Written Warnings

Written warnings are more serious than a verbal warning. A written warning will be given when an employee engages in conduct that justifies a written warning or the employee engages in unacceptable behavior during the period that a verbal warning is in effect. If the unacceptable behavior continues, the progressive disciplinary steps will take place.

Suspension

A suspension without pay is more serious than a written warning. An employee will be suspended when they engage in conduct that justifies a suspension, when the employee engages in unacceptable behavior, or when the employee is the subject of an ongoing investigation.

Termination

An employee will be terminated when they engage in conduct that justifies termination or when they do not correct the matter that resulted in less severe discipline. Employees of the Company are employed on an at-will basis, and the Company retains the right to terminate an employee at any time.

Again, while the Company will generally take disciplinary action in a progressive manner, it reserves the right, in its sole discretion, to decide whether and what disciplinary action will be taken in each situation.

Resignation

When an employee decides to leave for any reason, their manager would like the opportunity to discuss the resignation before final action is taken. If, however, after full consideration the employee decides to leave, it is requested that the employee provide the Company with a written two (2) week advance notice period (vacation days may not be included in the notice period).

Job Abandonment

Employees who fail to report to work or contact their manager for three (3) consecutive scheduled shifts shall be considered to have abandoned their job without notice, effective at the end of their normal shift on the third day. The manager shall notify the Human Resources department and Payroll department at the expiration of the third workday and initiate the process to terminate the employee. Employees who are separated due to job abandonment may be ineligible for rehire.

Dismissal

Every employee has the status of "employee-at-will," meaning that no one has a contract for employment. The Company may terminate an employee's employment, or an employee may terminate their employment, without cause, and with or without notice, at any time for any reason.

In the event of dismissal for misconduct, all benefits end immediately. COBRA may not be available to someone dismissed from the Company for gross misconduct.

Termination Guidelines

An employee can be terminated if they continue to engage in behavior that has not been corrected through the disciplinary warning process. Disciplinary warnings give the employee a chance to better their status before letting them go. Employees of the company are hired on an "at-will" basis, meaning they can be terminated at any time. Dismissal should be the result of a well-documented disciplinary process. Documentation is essential. It aids in the success of unemployment claims, protects the employer from complaints about unfair termination practices, and creates a positive working atmosphere where employees are treated fairly and consistently. We only need one official HR file, which should be stored at the office, therefore warnings must not be kept in the managers' office.

Human Resources must be contacted for approval on terminations, even if the manager has already gathered the appropriate information and held the necessary discussions. An employee can only be terminated on the spot if they have committed theft.

1. If the termination is Voluntary, the manager should discuss the resignation with the employee before taking any final action. The manager should request a written two-week notice from the employee or have them fill out the Resignation Form. The notice must be sent to Human Resources and Payroll (vacation days may not be included in the notice period).

2. If the termination is Involuntary, the manager must obtain HR approval before terminating an employee due to the employee's job performance, such as absences, insubordination, dishonesty, horseplay, and so on. The manager must also ensure that they have all documented warnings that led to the termination. All documentation must be sent to Payroll for termination completion once they have their supporting documents, HR permission, and a Termination Status Sheet. Employees must return any Company property (laptop, cell phone, office keys, credit cards.)

Return of Company Property

Human Resources may schedule an exit interview with a terminated employee. Employees must return any Company property including:

- Company Laptop.
- Company Cell Phone.
- Picture Identification Card.
- Office keys.
- Company-Issued Credit Cards.
- Company Manuals.
- Any additional Company-owned or issued property.

Payout Process

If a Massachusetts employee is terminated involuntarily, the Company is required to pay all wages in full on the employee's last day of work. The Company will pay an employee's final paycheck on the next regular payday if they voluntarily resign.

Rehire

Involuntarily terminated employees may not be eligible for re-hire. Employees who leave voluntarily may be eligible for re-hire if they meet the same conditions listed under the Internal Transfers section of this handbook.

Former employees who are rehired and return to work more than three (3) months after their termination will be rehired only as new employees and must complete a new orientation period.

They will be considered new employees for all benefits. As a rule, the Company will not rehire former employees who:

- Were dismissed by the Company.
- Committed an act of theft.
- Resigned without giving two (2) weeks' notice.
- Were dismissed for inability to perform job duties.
- Had a poor attendance record or a below-average evaluation.
- Violated work rules or safety rules.

COBRA Continuation of Benefits

The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under the Company's health plan when a "qualifying event" would normally result in the loss of eligibility.

If an employee loses health care benefits because of a resignation, termination, or other qualifying event (except for gross misconduct) from the Company's employment, they and eligible dependents have the option to continue health benefits coverage in accordance with the Consolidated Omnibus Budget Reconciliation Act (COBRA) regulations.

The Company's Third-Party Administrator will provide each eligible employee with a written notice describing rights granted under COBRA when a qualifying event occurs. The notice contains important information about the rights and obligations of the employee and/or beneficiary(ies). Failure to timely comply with the notice may result in a loss of insurance coverage. It is imperative that each employee report to the Company any changes in their marital status and age of dependents.

If you have any questions regarding the policies contained in this book, give HR a call. We are here to help!

RECEIPT OF SEXUAL HARASSMENT POLICY

It is the policy of The Scrivanos Network to prohibit harassment of any employee by any supervisor, manager, employee, customer, or vendor based on sex or gender. The purpose of this policy is not to regulate personal morality within the Company, it is to ensure that at the Company all employees are free from sexual harassment. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars, or posters, sending sexually explicit emails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of their gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If the employee feels that they have been subjected to conduct which violates this policy, the employee should immediately report the matter to any member of management. If unable for any reason to contact this person, or if the employee has not received a satisfactory response after reporting any incident of perceived harassment, the employee should contact the Human Resources Department at: 3 Pluff Avenue, North Reading, MA 01864: (978) 898-1201.

If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If an employee feels that they have been subjected to any such retaliation, the employee should report it in the same manner in which a claim of perceived harassment would be reported under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

I have read and I understand The Scrivanos Network’s Sexual Harassment Policy.

_____

Employee's Printed Name Position

_____

Employee's Signature Date

The signed original copy of this acknowledgment should be given to management - it will be filed in your personnel file.

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

This Employee handbook is an important document intended to help you become acquainted with The Scrivanos Network. This document is intended to provide guidelines and general descriptions only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because the Company's operations may change, the contents of this handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this Employee handbook.

- **I have received and read a copy of The Scrivanos Network's Employee handbook. I understand that the policies, rules, and benefits described in it are subject to change at the sole discretion of the Company at any time.**
- **I further understand that my employment is terminable at will, either by myself or the Company, with or without cause or notice, regardless of the length of my employment or the granting of benefits of any kind.**
- **I understand that no representative of The Scrivanos Network other than the owner of the company may alter "at will" status and any such modification must be in a signed writing.**
- **I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Company's Employee handbook.**

Employee's Printed Name Position

Employee's Signature Date

The signed original copy of this acknowledgment should be given to management - it will be filed in your personnel file.