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# New York Contractor Handbook

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Populus Group

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## Welcome to Populus Group!

We are very excited that you have joined our dynamic team. We are strongly committed to an organization and environment where each of our employees can reach their highest potential. This handbook is designed to acquaint you with the Company and provide you with information about some of the policies affecting your employment. You should read, understand, and comply with all provisions of the handbook.

No employee handbook can anticipate every circumstance or question about policy. The Company reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion.

If you have any questions about the Company's policies, please feel free to contact any Company representative.

Throughout this Handbook, "The Company" refers to Populus Group, LLC.

The Company intends to comply with all applicable federal, state, and local laws, including but not limited to those relating to medical, family or military leave; equal employment opportunity; environmental regulations and laws; safety; health; and laws regarding any other terms and conditions of employment. Similarly, we expect employees to comply with all laws that apply to their jobs.

This Handbook and each of its provisions is to be interpreted and/or applied in accordance with all applicable federal, state, and local laws. Insofar as there is or may appear to be a conflict between the wording of any provision of this Handbook and applicable law, the law shall take precedence and the provision in question shall be interpreted and applied in a way that conforms to the law.

### Important Note About this Handbook and Employment-At-Will

Populus Group is an at-will employer. Either you or The Company may terminate the employment relationship at any time, for any reason, with or without cause or notice. Nothing in this Handbook shall limit the right for employment to terminate at-will. No supervisor or representative of The Company is authorized to enter into an agreement – expressed or implied – with any employee for employment other than at-will. Only the President of the Company has any authority to enter into any agreement for employment for any specified period. Any such agreement by the President shall be in writing and signed by the President.

This Handbook is not an expressed or implied contract.

## Code of Conduct

In addition to this employee handbook, the company also maintains a code of conduct ("Code"). You should review and comply with our code in addition to this employee handbook. Our code is designed to provide guidance for conducting business according to the highest ethical standards. Based on our shared values, it also provides guidance and instruction on how to

identify and deal with ethical issues if and when they arise period our code also provides clear mechanisms for reporting unethical conduct without fear of retaliation or retribution.

To make an ethics violation report, you may contact any of the following resources:

- A Human Resources representative for the Company
- The Legal department for the Company
- The Company Corporate Ethics and Compliance Officer, by mail or e-mail
  - By mail: 3001 Big Beaver Rd. Troy, MI 48084
  - By e-mail: [hr@populusgroup.com](mailto:hr@populusgroup.com)
- The External Hotline
  - By phone: 844-781-8201
  - Via the internet: <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>

## Equal Employment Opportunity

To provide equal employment and advancement opportunities to all individuals, employment decisions at the Company are based on merit, qualifications, and abilities. The Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, gender expression, gender identity, sexual orientation, national origin, age, disability, pregnancy, childbirth or related medical condition, citizenship status, military or veteran status, genetic information, union affiliation or any other characteristic protected by federal, state, or local law ("Protected Characteristics"). This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or team leader. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination or any supervisor who retaliates against any employee for reporting concerns is subject to disciplinary actions, up to and including immediate termination of employment.

## Employment Selection Policy

It is the Policy of the Company to conduct an employment selection process that includes a variety of procedures to ensure that it evaluates, selects, refers, and employs the most qualified individuals. The Company's Employment Selection Process ("Selection Process") is designed to assess an applicant's/employee's ability: (1) to meet the qualifications of the position; (2) to adhere to the Company's, and as required, the designated Client's legal, ethical and conduct standards; and (3) to perform the job requirements of the position without posing an unacceptable risk of harm to self or others.

The Selection Process primarily includes a review of the applicant/employee's qualifications, prior employment history, reference checks and ability to perform the job. The Selection Process may also include pre-employment ability testing, medical examinations, drug screening and/or Consumer Reports. "Consumer Reports" may include, but are not limited to criminal

conviction history, credit history, employment, and education verification, driving history and other public records. All requested Consumer Reports are initiated by the Company through an authorized third-party vendor. Only Consumer Reports secured from an authorized third-party vendor will be considered part of the Company's Selection Process for purposes of determining employment eligibility.

## Consumer Report Policy

It is the policy of the Company to initiate an applicant's Consumer Reports after an offer has been made and before the position start date. The Company may also conduct Consumer Reports in connection with promotion, retention, and reassignment decisions for all internal positions. In addition, the Company may conduct post offer, pre-employment applicant, promotion, retention, and reassignment Consumer Reports, consistent with this process at the request of the designated Client for any contract assignment.

Initiation of a Consumer Report requires a completed and signed Authorization for the Procurement of a Consumer Report Form ("Authorization Form"). The Company reserves the right to exclude any applicant from further consideration for employment, or to terminate any employee, who refuses to sign the Authorization Form and/or submit to a Consumer Report. Customers that require an applicant/employee to submit to a Consumer Report must complete and sign a Customer Position Certification Form ("CPC"), and/or other designated forms. The Company reserves the right to deny Client requests to perform a Consumer Report if a CPC, or other required forms, are absent, or if the request is inconsistent with applicable legal regulations.

The Company conducts a targeted screen of all Consumer Report results to determine if an applicant/employee will be disqualified from further consideration for the applicable position. The Company will notify the applicant/employee of a pre adverse disqualification for employment in accordance with the Fair Credit Reporting Act (FCRA) requirements and provide the applicant/employee with an opportunity to submit additional relevant information for consideration concerning the facts and/or circumstances of the conviction(s) and/or conduct. Consumer Reports disputed for inaccuracies in accordance with the FCRA that result in an amended Consumer Report will be reassessed by the Company in accordance with this policy. Any additional relevant information received from an applicant/employee will be reviewed and considered in an individualized assessment conducted by the Company.

The Company utilizes the following criteria when evaluating the results of a Consumer Report:

## Criminal Conviction Results

The Company conducts a targeted screen of all criminal results to determine if an applicant/employee will be disqualified from further consideration for the applicable position. The targeted screen shall consider the nature and gravity of the offense or conduct, the time elapsed since the offense, conduct and/or completion of the sentence and the nature of the job. Any applicant/employee preliminarily disqualified during the targeted screen will be provided with notice and an opportunity to participate in an individualized assessment by completing a Background Individualized Assessment Form ("Assessment Form") as

part of the FCRA pre-adverse action notification process. Applicant/employees who receive a pre-adverse action notification have five (5) business days to complete and return Assessment Form to Company; otherwise, the Company will proceed with making the hiring decision based on the information obtained in the Consumer Report results.

An assessment of Criminal Conviction shall include, among other details, any additional relevant information provided by the applicant/employee concerning the facts or circumstances surrounding the offense or conduct. The assessment may also consider the following factors, including but not limited to: (1) age at the time of conviction or conduct; (2) age when released from criminal conduct penalties, if applicable; (3) relevant work history after the offense or conduct, related to the applicable potential position, such as same or different employer, with any known incidents of criminal conduct; (4) length and consistency of employment history before and after the offense or conduct; (5) rehabilitation efforts related to the offense or conduct; (6) employment or character references and any other information regarding fitness for the applicable position at Client; and (6) whether the individual is bonded under a federal, state or local bonding program. Upon receipt of the Assessment Form, a Background Investigation Analyst will consider and weigh the information provided by the applicant/employee against job related factors and business necessity to reassess his/her eligibility for the applicable position. Where appropriate, the Background Investigation Analyst may also consult with HR and legal representatives when evaluating the additional information.

## Reasonable Accommodations/Modified Job Duties

To assist our employees who are or become disabled, who suffer on-the-job injuries or who are pregnant, we will make reasonable accommodations to enable such employees to continue performing the essential functions of their jobs. Consistent with this policy, we may modify job duties to comply with medical requirements or restrictions. Other accommodations, such as transferring to another position, allowing employees to apply for a vacant position for which the employee is qualified or providing a leave of absence may be appropriate, depending upon specific facts and circumstances of individual situations. Likewise, we will make reasonable accommodations for an individual's sincerely held religious beliefs and practices to the extent required by applicable law.

There are limits to the accommodations we can realistically make. For example, where an accommodation would cause an undue hardship to the Company, we may be unable to make the accommodation. Similarly, if placing an individual in a position, with or without accommodation, would cause the employee to be a direct threat to him or herself or others, we may be unable to place the employee in a particular position.

If you need to request a reasonable accommodation because of a disability, pregnancy, on-the-job injury, or religious beliefs, please notify your Populus Group point of contact. We will discuss the matter with you, investigate your request, and to the extent possible, attempt to reasonably accommodate you.

Any employee who has questions or concerns about reasonable accommodations in the workplace is encouraged to speak to Human Resources. Employees can raise concerns and make reports and/or requests without fear of retaliation or retribution. Anyone who retaliates against any employee for reporting concerns or making accommodation requests may be subject to discipline, up to and including immediate termination.

## Preventing Harassment

We are committed to creating a positive and productive work environment in which everyone is treated with respect and dignity. This means we must not engage in behavior that could be viewed as harassing or hostile to our coworkers or customers. Such behavior includes disparaging or inappropriate remarks, gestures, or conduct relating to a person's:

- Race, color, or national origin
- Gender
- Genetic origin
- Gender Identity
- Gender Expression
- Sexual orientation
- Religion
- Age
- Disability
- Veteran status
- Other characteristics protected by applicable law

Harassment can be sexual or non-sexual in nature. Sexual harassment includes conduct such as unwanted advances, inappropriate sexual jokes, sexually suggestive comments, inappropriate touching, requests for sexual favors and inappropriate comments about another's appearance. Non-sexual harassment may include intentionally refusing to use an employee's preferred name or pronoun, offensive comments, jokes or pictures related to the topics listed above.

Use of Populus Group, or a client's, network, system, or any electronic device (personal or company- issued) to harass another person is also strictly prohibited.

Individuals who believe they are being harassed or who believe they have witnessed such prohibited conduct should immediately notify their Populus Group point of contact or Human Resources department ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com)).

For further information about preventing harassment, you may also consult the Human Resources department ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com)).

## Sexual Harassment

Populus Group is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of the Populus Group's commitment to a discrimination-free work environment. Sexual harassment is against the law<sup>1</sup> and all employees have a legal right to a workplace free from sexual harassment and employees are urged to report sexual

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<sup>1</sup> While this policy specifically addresses sexual harassment, harassment because of and discrimination against persons of all protected classes is prohibited. In New York State, such classes include age, race, creed, color, national origin, sexual orientation, military status, sex, disability, marital status, domestic violence victim status, gender identity and criminal history.

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harassment by filing a complaint internally with the Company. Employees can also file a complaint with a government agency or in court under federal, state, or local antidiscrimination laws.

## Policy:

1. This policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with Populus Group.
2. Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action up to and including termination.
3. Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. The Company will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Populus Group who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees, paid or unpaid interns, or non-employees<sup>2</sup> working in the workplace who believe they have been subject to such retaliation should inform a Company supervisor, manager, human resources ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) or 630 874 7251), or contact the ethics hotline (844-781-8201 or <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>). All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections.
4. Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject Populus Group to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.
5. Populus Group will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. The Company will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.
6. All employees are encouraged to report any harassment or behaviors that violate this policy. The Company will provide all employees a complaint form for employees to report harassment and file complaints.
7. Managers and supervisors are **required** to report any complaint that they receive to human resources, or any harassment that they observe or become aware of, to human resources or contact the ethics hotline.

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<sup>2</sup> A non-employee is someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected non-employees include persons commonly referred to as independent contractors, "gig" workers and temporary workers. Also included are persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with the employer.

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This policy applies to all employees, paid or unpaid interns, and non-employees and all must follow and uphold this policy.

## What Is “Sexual Harassment”?

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual’s sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment.
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual’s employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation, or physical violence which are of a sexual nature, or which are directed at an individual because of that individual’s sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient’s job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions, or privileges of employment. This is also called “quid pro quo” harassment.

Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

## Examples of sexual harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee’s body, or poking another employee’s body.
  - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:

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- Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments.
  - Subtle or obvious pressure for unwelcome sexual activities.
  - Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
  - Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
  - Sexual or discriminatory displays or publications anywhere in the workplace, such as:
    - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
  - Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
    - Interfering with, destroying, or damaging a person's workstation, tools, or equipment, or otherwise interfering with the individual's ability to perform the job.
    - Sabotaging an individual's work.
    - Bullying, yelling, name-calling.

## Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer, or visitor.

## Where can sexual harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

## Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in “protected activity.” Protected activity occurs when a person has:

- Made a complaint of sexual harassment, either internally or with any anti-discrimination agency.
- Testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law.
- Opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment.
- Reported that another employee has been sexually harassed; or
- Encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

## Reporting Sexual Harassment

**Preventing sexual harassment is everyone’s responsibility.** Populus Group cannot prevent or remedy sexual harassment unless it knows about it. Any employee paid or unpaid intern or non-employee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to a Company supervisor, manager, human resources, or contact the ethics hotline. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a Company supervisor, manager, human resources, human resources ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) or 630 874 7251), or contact the ethics hotline (844-781-8201 or <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>).

Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this Policy, and all employees are encouraged to use this complaint form. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee’s behalf.

Employees, paid or unpaid interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

## Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected

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sexual harassment to human resources [HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) or 630 874 7251), or contact the ethics hotline (844-781-8201 or <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>).

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, Company supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Company supervisors and managers will also be subject to discipline for engaging in any retaliation.

## Complaint and Investigation of Sexual Harassment

**All** complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. The Company will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, the Company will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If the complaint is verbal, encourage the individual to complete the "Complaint Form" in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
- If documents, emails, or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses.
- Create a written documentation of the investigation (such as a letter, memo, or email), which contains the following:
  - A list of all documents reviewed, along with a detailed summary of relevant documents.
  - A list of names of those interviewed, along with a detailed summary of their statements.
  - A timeline of events.
  - A summary of prior relevant incidents, reported or unreported; and
  - The basis for the decision and final resolution of the complaint, together with any corrective action(s).

- Keep the written documentation and associated documents in a secure and confidential location.
- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.
- Inform the individual who reported of the right to file a complaint or charge externally as outlined in the next section.

## Legal Protections and External Remedies

Sexual harassment is not only prohibited by the Company but is also prohibited by state, federal, and, where applicable, local law.

Aside from the internal process at the Company, employees may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

In addition to those outlined below, employees in certain industries may have additional legal protections.

### State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State regarding sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time **within one year** of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, **within three years** of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to the Company does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees, and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Contact DHR at (888) 392-3644 or visit [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized, and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

## Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

## Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city, or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

## Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

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## Harassment Prevention Training Requirement

Populus Group Employees in California, Connecticut, Delaware, Illinois, Maine, and New York are required to complete the harassment prevention training based on the state guidelines. The training will be provided during the first week of the employment via training portal: Litmos.com and expected to be completed during working hours.

## Pay Transparency

The company will not discharge or in any other manner discriminate against contract employees or applicants because they have inquired about, discussed, or disclose their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation proceeding, hearing, or action, including an investigation conducted by the employer, (c) consistent with the company's legal duty to furnish information, or (d) unless otherwise legally permissible.

## Employee Conduct and Work Rules

Populus Group believes in conducting business in accordance with uncompromising ethical standards. Employees are required to always conduct themselves in a professional and productive manner. Although it is not possible to list every form of inappropriate workplace behavior, the following are examples of inappropriate conduct that may result in discipline, up to and including immediate termination:

- Theft or unauthorized removal or possession of Company property.
- Falsifying Company or client records whether paper or electronic.
- Possessing, distributing, selling, transferring, or using illegal drugs or alcohol or working under the influence of illegal drugs or alcohol in the workplace, while on duty, or while operating vehicles or equipment in the performance of their work duties.
- Distributing, selling, or transferring prescription drugs.
- Fighting or threatening violence in the workplace.
- Damaging employer-owned or customer-owned property through negligence or improper use.
- Behaving in an insubordinate or other disrespectful manner.
- Behaving in a rude or unprofessional manner.
- Using profane or vulgar language.
- Sleeping on the job.
- Violating safety or health rules.
- Smoking or use of tobacco in prohibited areas.
- Engaging in sexual or other unlawful harassment or discrimination.
- Starting or perpetuating rumors, false statements, or gossip.
- Possessing dangerous or unauthorized materials in the workplace, such as explosives or firearms.

- Violating attendance expectations
- Using telephones, mail system, or other employer-owned equipment without authorization.
- Excessive personal phone use, including cell phone use, during work hours.
- Disclosing business secrets or confidential information.
- Violating personnel policies.
- Unsatisfactory performance.
- Inappropriate computer use; or
- Verbalizing, publishing, electronically posting or distributing false or malicious statements concerning THE COMPANY, clients, managers, or any employee.

This list is not all-inclusive and there may be other circumstances for which employees may be disciplined or terminated at the discretion of the Company considering the nature and severity of the behavior. If you have any questions about these rules, or what we expect of our employees, please discuss them with Human Resources.

Nothing in this handbook or this policy is intended to unlawfully restrict your right to engage in any of the rights guaranteed by Section 7 of the National Labor Relations Act, including, but not limited to, the right to engage in concerted activity for the purposes of mutual aid and/or protection, or any similar state law provision. Nothing in this handbook or policy will be interpreted, applied, or enforced to interfere with, restrain or coerce employees in the exercise of Section 7 rights or any other legal rights.

## Workplace Identity Theft Policy

Identity theft often begins with a crucial piece of personal data and results in thousands of dollars of loss and hours in fixing the problems. Populus Group has a policy that protects the personal information of everyone our company touches: from contractors to internal employees.

If you work with personal information such as social security numbers, salaries, and address information, you have a responsibility to protect this information. For guidelines on how to handle and safeguard personal information, refer to the policies in THE COMPANY's Information Security Program.

Failure to comply with these policies will result in penalties up to and including the termination of your employment, depending on the severity of the incident.

## Smoking/Tobacco

Populus Group maintains a smoke- and tobacco-free office. No smoking or other use of tobacco products (including, but not limited to, cigarettes, pipes, cigars, snuff, or chewing tobacco) is permitted in any part of the building. Employees may smoke outside in designated areas during breaks, when complying with building regulations as well as local ordinances and laws.

# Substance Abuse

## Policy Statement

It is the Company's desire to provide a drug and alcohol-free, healthy, and safe workplace. To promote this goal, employees are required to report to work, and while at work, remain at all times in a condition to perform their jobs in a satisfactory manner. This policy covers all Company employees - full-time, part-time, and temporary employees, and interns.

While on Company premises and while conducting business-related activities off Company premises, no employees may use, possess, distribute, sell, or have a system presence of illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair a Populus employee's ability to perform the essential functions of the job effectively and safely. The Company will follow the federal guidelines in determining the definition of illegal drugs.

## Stipulations

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment. Such violations may also have legal consequences.

## Rehabilitation

The Company encourages any employee with a drug or alcohol abuse problem to seek treatment voluntarily.

No employee is subject to disciplinary action solely for acknowledging a drug or alcohol problem and seeking treatment for the problem. However, in order to take advantage of that protection, you must come forward and seek treatment before you have received a positive drug or alcohol test result or otherwise violated this policy.

Under the rehabilitation program and agreement, employees who participate are, among other things, required to successfully complete an alcohol or drug treatment program recommended by their substance abuse professional before returning to work. Employees must agree to keep The Company apprised of their compliance with the program recommended by the substance abuse professional.

In the case of a positive test result or the violation of any other aspect of this policy, The Company reserves the right to determine whether to allow the employee an opportunity to enter a rehabilitation program or an individual rehabilitation agreement as an alternative to termination.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of disciplinary action, may request approval to take unpaid time off to participate in a rehabilitation and treatment program. The Company's health

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insurance coverage may pay for portions of that treatment. Leave may be granted if the employee agrees to the following conditions:

- Abstain from use of the problem substance; and
- Abide by all Company policies, rules, and prohibitions relating to conduct in the workplace; and
- If granting the leave does not cause The Company any undue hardship.

Employees' acknowledgment of a drug or alcohol problem, and their participation in drug or alcohol rehabilitation does not relieve the employee of the responsibility of behaving properly at work and properly performing their jobs; nor does it excuse employees from complying with this policy. The Company may take disciplinary action, up to and including termination, whenever an employee's performance or behavior is deemed by The Company to be unacceptable, or if the employee violates this policy.

## Drug Testing

The Company requires that all employees be free of alcohol and illegal drugs while working in the workplace. The Company reserves the right to require drug and alcohol tests in the following situations: Pre-employment; Reasonable cause or suspicion; Following an on the job incident which results in serious personal injury or property damage.

An employee's failure to immediately comply with a request to submit to a substance test results in immediate termination.

All drug and alcohol tests are performed by a certified laboratory in accordance with the guidelines for Federal Workplace Testing. All positive results are verified with a second clinical test on the same sample.

Employees with questions about this policy or issues related to drug or alcohol use in the workplace should raise their concerns, without fear of reprisal, with their supervisor or any member of the leadership Team.

## Travel & Expense Policy

### Overview

This policy applies to all Populus Group Contract Employees performing work for Populus Group's respective Clients. This policy outlines the framework and limitations for reasonable and authorized expense reimbursement. If a circumstance arises that is not specifically covered in this travel policy, then the most conservative course of action should be taken.

It is the policy of Populus Group to reimburse Contract Employee's for Client approved expenses deemed reasonable and necessary for Client business. The nature of the business connection and reasonableness will rely largely on the designated Client personnel approval. In good practice, Contract Employees should obtain advance Client and Populus Group approval to ensure reimbursement eligibility.

Contract Employees incurring business related travel expenses should incur the lowest reasonable travel rates, unless outlined otherwise in Client travel policies. It is the Contract Employee's responsibility to obtain advance approval for business related

travel costs. Business related travel arrangements will not be reimbursed until after the trip occurs and submitted expense reports are approved by the designated Client personnel.

## Procedure

- It is the Contract Employee's responsibility to ensure the complete, Client approved expense report is routed to Populus Group for review and payment processing. Populus Group has the right to withhold or delay expense reimbursement to validate any expense discrepancies with Client or Contract Employee. **Expenses submitted after 90 days from the date of transaction will not be processed for reimbursement.**
- A complete expense report includes expense type (i.e., meal, mileage, airfare, etc.), amount, business reason, and legible proof of purchase, (i.e., original or scanned itemized receipt). **Expense reports submitted without proof of purchase will not be eligible for reimbursement**, with the exception of travel mileage or toll fees. International expense reports must also include exchange rate documentation at the time of purchase.
- Mileage will be reimbursed per mile at the yearly established IRS federal rate unless the Client has established an alternate reimbursement rate.
- It is Populus Group's policy to deem an extreme purchase or cost ineligible for reimbursement without receiving advanced designated Client personnel approval.

## Reimbursable Expenses – *not inclusive*

- Hotel
- Airfare
- Baggage
- Transportation: Taxi, Train, Bus, Car Service, etc.
- Mileage
- Toll Fees
- Parking
- Meals

## Prohibited Expenses – *not inclusive*

- Credit, debit, and charge card fees (including interest, annual costs)
- Personal dues to clubs for airlines
- Tourist attractions
- Alcoholic beverages
- Toiletries and personal use items
- Personal entertainment
- Health/fitness memberships
- Parking tickets and traffic fines
- Childcare or Pet care

## Data Expense Reimbursement

Under certain state laws, employers are required to provide employees with a reasonable reimbursement for business expenses incurred on behalf of an employer. Populus Group will pay W2 contractors who are working remote due to mandatory requirements of a client or Populus Group and working in a designated state/city 0.10 cents per hours, up to 40 hours or a maximum of \$4 per week. This payment is intended to reimburse the contractor for reasonable and necessary work-related expenses because of working remotely, such as cell phone use, internet, or other work-related expenses. A contractor who is an active Populus Group employee but does not report hours for the week ending date will not be reimbursed for this expense. If a contractor is currently receiving a reimbursement for a cellphone or other business-related expense as a result of working remotely, they would not be eligible to additionally receive the Data Expense Reimbursement. Contractors will be required to submit the data expense for reimbursement weekly when entering in their timecard. Please reach out to you Populus Group main point of contact on how to enter this expense, as this can differ based on your client guidelines.

Populus Group Contractors in the following states and cities would be eligible for the Data Expense Reimbursement:

- California
- Illinois
- Montana
- New Hampshire
- North Dakota
- South Dakota
- Seattle, Washington

## Populus Group Referral Program

Populus Group is happy to provide current employees with a referral bonus in the amount of \$150 for a successful referral to an open position with Populus Group.

The new employee must complete 120 consecutive days of work before the bonus will be released. This bonus will be paid out as a one-time bonus. If the 120 consecutive days is not completed, no bonus will be issued.

You may obtain a referral form to be submitted with the prospective candidates resume. This can be submitted to the hiring manager at Populus Group who is recruiting for the open position. A copy of the form will be kept in on file. You will not be able to receive a referral bonus for an employee that you yourself will be directly managing at the onset of their employment.

## Accident Reporting

### Policy

It is the Company's policy to provide medical care to employees experiencing an unintentional on-the-job injury or illness. Contract employees and consultants must notify a Company representative and supervisor immediately following an unintentional on-the-job injury or illness. Once reported, a medical facility is authorized to provide adequate medical care. To assist in the rehabilitation process following an on-the-job injury, the Company offers modified-duty assignments to contract employees and consultants based on prescribed medical limitations.

### Procedures for Accident Reporting

The following steps must be followed by a contract employee or consultant who suffers an unintentional on-the-job injury or illness:

1. Notify the client supervisor and a Company representative immediately and send an email to [Workerscomp@populusgroup.com](mailto:Workerscomp@populusgroup.com) notifying the company of the injury.
2. In emergency situations, proceed to the nearest emergency medical facility and obtain temporary medical care.
3. Complete a Company Employee Unintentional Injury report. Provide a detailed explanation of the event. Include information such as the time, date, location, cause, and effect of the event.
  - i. Form can be found here: <https://learn.populusgroup.com/worker-incident>
4. The Company representative may provide a listing of physicians, industrial clinics, and medical facilities in the area. Please reach out for the list of surrounding clinics. Update the Company representative about the status of your health and ability to return to work.

## Airborne Infectious Disease Exposure Prevention Plan

In accordance with the New York Health and Essential Rights Act (NY HERO Act), The Company has adopted the following Airborne Infectious Disease Exposure Prevention Plan to protect employees against exposure to airborne infectious diseases during a declared outbreak. This plan will be activated upon a declaration of an airborne infectious disease outbreak by the New York State Commissioner of Health and will remain in effect until the declaration is lifted.

1. **Purpose:** This plan outlines the workplace policies and procedures to reduce the risk of exposure to airborne infectious diseases and ensure a safe and healthy work environment.
2. **Scope:** This plan applies to all employees and operations where exposure to airborne infectious agents may occur during an outbreak declared by the New York State Commissioner of Health.
3. **Designated Safety Coordinator:** Miranda Myny ([HR@populusgroup.com](mailto:HR@populusgroup.com)) **Role:** Responsible for implementing, monitoring this plan.
4. **Exposure Controls:** During an airborne infectious disease outbreak, the following minimum controls should be utilized:

The employee should inform the designated contact and follow New York State Department of Health (NYSDOH) and Centers for Disease Control and Prevention (CDC) guidance regarding obtaining medical care and isolating. The employee should also notify the designated Populus Group representative.

**Health Screening:** Employees are to self-monitor throughout their shift and report any new or emerging signs or symptoms of the infectious disease to the designated contact. An employee showing signs or symptoms of the infectious disease should be removed from the workplace and should contact a healthcare professional for instructions. The health screening elements will follow NYSDOH and CDC guidance, if available.

**Face Coverings:** When in use, face coverings must cover the nose and mouth, and fit snugly, but comfortably, against the face. The face covering itself must not create a hazard at the worksite. (e.g., have features that could get caught in machinery or cause severe fogging of eyewear). The face coverings must be kept clean and sanitary and changed when soiled, contaminated, or damaged.

**Physical Distancing:** Physical distancing should be used, to the extent feasible, as advised by guidance from State Department of Health or the Centers for Disease Control and Prevention, as applicable.

**Hand Hygiene:** To prevent the spread of infection, employees should wash hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol to clean hands BEFORE and AFTER:

- Touching your eyes, nose, or mouth;
- Touching your mask;
- Entering and leaving a public place; and
- Touching an item or surface that may be frequently touched by other people, such as door handles, tables, gas pumps, shopping carts, or electronic cashier registers/screens.

Because hand sanitizers are less effective on soiled hands, wash hands rather than using hand sanitizer when your hands are soiled.

**Respiratory Etiquette:** Because infectious diseases can be spread by droplets expelled from the mouth and nose, employees should exercise appropriate respiratory etiquette by covering nose and mouth when sneezing, coughing or yawning.

**Special Accommodations for Individuals with Added Risk Factors:** Some employees, due to age, underlying health condition, or other factors, may be at increased risk of severe illness if infected. Please inform your supervisor or the HR department if you fall within this group and need an accommodation.

Employees may be eligible for paid sick leave or other benefits under federal, state, or local laws if they are unable to work due to illness or quarantine.

**5. Anti-Retaliation:** No employer, or his or her agent, or person, acting as or on behalf of a hiring entity, or the officer or agent of any entity, business, corporation, partnership, or limited liability company, shall discriminate, threaten, retaliate against, or take adverse action against any employee for exercising their rights under this plan, including reporting conduct the employee reasonably believes in good faith violates the plan or airborne infectious disease concerns to their employer.

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## Foreign National Family Insurance Enrollment

Due to the fact that some foreign national consultants are unable to enter the United States accompanied by their immediate family at the time of hire; our company policy states that a foreign national is eligible to add an immediate family member to their current insurance policy at the point when that immediate family member enters the United States. A proof of entry will be required at that time and the consultant will need to complete the enrollment process within 30 days from the date of entry to add the family member. If not completed within the 30 days, they will be eligible during the next open enrollment period.

Note: In order to be eligible, you must be a full-time employee, working a minimum of 32 hours per week.

## Separating from The Company

### Voluntary Termination of Employment

A termination is considered voluntary when the employee:

- Gives notice of his or her intention to resign from The Company
- Is absent from work for two consecutive days without notifying The Company
- Fails to return to work at the end of an approved leave of absence

An employee who resigns from a position must:

- Provide written notification of resignation to The Company; and
- Submit the written notification to his or her Populus Group point of contact at least two weeks prior to the anticipated last day employment.

Employees who choose to resign under favorable terms and conditions will be considered eligible to reapply with The Company for any future opportunities.

### Return of Property

When an employee leaves the Company, all Company property must be returned no later than the last day of employment. Company property includes, but is not limited to: the original and any copies of any electronic or hardcopy Confidential Information, Trade Secret information, Company-issued keys, pass cards, tools, samples, fax machines, cell phones, PDAs, computers (laptop and/or desk top), credit cards, rolodexes, files, brochures, equipment, documents, lists, reports, printouts, drawings, plans, sketches, computer disks, zip drives, printouts and any other record or document relating to the Company or its

business, products or services, or any information required to be returned in accordance with any applicable employment agreement. You are required to abide by any obligations set forth in an applicable employment agreement when separating from the Company.

## Notice

Employee benefits are affected by employment termination. The employee may choose to continue some benefits at their own expense. The employee is notified in writing of the benefits that may be continued and of the terms, conditions, and limitations of such continuance.

Unless otherwise required by local or state law or regulations, the terminated employee's final paycheck is generally available at the next regularly scheduled pay period.

The Company expects its employees to give at least two weeks' notice before resigning. The Company reserves the right to end employment prior to the final date of employment provided in an employee's resignation. Employees who have signed non-compete agreements are required to reaffirm their obligation under an understanding of the agreement to be eligible for notice pay.

Employees who are discharged (involuntarily terminated) are not eligible for notice pay.

Employees who are absent from work for two or more consecutive days without contacting their supervisor, are considered to have abandoned their job and to have resigned without notice.

Any paid time off that is detailed in an employee's employment agreement will not be paid out at time of termination unless state law states otherwise.

## Employee Leave

We encourage each of our employees to accept their civic responsibilities. As a good corporate citizen, the Company is pleased to assist you in the performance of your civic duties.

### Jury Duty

If you receive a call to jury duty, please notify your supervisor immediately so we can plan the work with as little disruption as possible. While you are on jury duty, the Company will comply with applicable law including with regard to payment of wages while an employee is on jury duty where applicable.

Employees on jury duty must provide their supervisor with a copy of the subpoena. Employees who are released from jury service before the end of their regularly scheduled shift or who are not asked to serve on a jury panel are expected to call their supervisor as soon as possible and report to work if requested and if allowed by law.

## Witness Duty

If you are subpoenaed to appear as a witness, please notify your supervisor immediately so we can plan the work with as little disruption as possible. We do not pay employees who are subpoenaed to appear as witnesses unless the employee's appearance is requested by or on behalf of the Company or required by applicable law.

Employees with witness duty must provide their supervisor with a copy of the subpoena. Employees who are released from witness service before the end of their regularly scheduled shift are expected to call their supervisor as soon as possible and report to work if requested.

## Voting

Although polls are open most of the day, we realize that in some instances our employees are required to work long hours or overtime and may have insufficient time to get to the polls. If you have a problem in this regard, please let your supervisor know so that we can make arrangements for you to have the necessary time to get to the polls. You may be entitled to up to two (2) hours of paid time off to vote.

## Sick Leave

For any qualified employee requesting 3 or more consecutive days of sick leave, the Company reserves the right to require a note from a medical provider verifying that the absence was caused by a medical situation.

For additional information or to confirm if you qualify for paid sick leave, contact your Populus Group representative.

## Bereavement Time

An employee is eligible to receive up to 8 hours paid leave for a death in the employee's immediate family (spouse, child, grandchild, parent, parents-in-law, siblings, grandparents) or those who took the place of parents.

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## Crime Victim Leave

Unpaid time off to attend court or related proceedings, consult with an attorney, seek medical attention or counseling related to the crime. Employees must provide reasonable advance notice for a need to leave. The company may request documentation.

## Domestic Violence Leave

The Company is committed to supporting employees who are victims of domestic violence. In accordance with the New York State Human Rights Law (NYSHRL) and Labor Law, we provide the following rights and protections:

An individual is considered a victim of domestic violence if they are subjected to acts by a family or household member that would constitute a violation of the penal law, including physical abuse, threats, stalking, or harassment. Employees who are victims of domestic violence are entitled to unpaid leave to:

- Seek medical attention for injuries related to domestic violence
- Obtain services from a domestic violence shelter or program
- Receive psychological counseling
- Participate in safety planning
- Obtain legal services or appear in court

Leave may be denied if it would cause an undue hardship to the employer. Employees should provide advance notice of the need for leave when possible. The Company may request reasonable documentation, such as a court order, police report, or a letter from a service provider.

## Organ and Bone Marrow Donor Leave

In New York State, public employees are entitled to paid leave for organ and bone marrow donation under Labor Law § 202-B. This law ensures that eligible employees can take time off for these life-saving procedures without using their accrued leave.

**Organ Donation:** Up to 30 workdays of paid leave per calendar year. **Bone Marrow Donation:** Up to 7 workdays of paid leave per calendar year.

The leave is in addition to any other sick or annual leave the employee is entitled to. Employees must provide at least 14 days' written notice before taking leave. Unless there is a medical emergency, in which case the employee must provide documentation from a physician explaining the urgency.

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## Family and Medical Leave (including Military-Related FMLA Leave)

The Family and Medical Leave Act ("FMLA") provide eligible employees the opportunity to take unpaid, job-protected leave for certain specified reasons.

### Employee Eligibility

- Have worked at least 12 months for the Company in the last seven years; and
- Have worked at least 1,250 hours for the Company over the preceding 12 months

All periods of absence from work due to Military-related FMLA Leave (see section below) are counted in determining FMLA eligibility.

### Conditions Triggering Leave

- Family Medical Leave may be taken for the following reasons:
- Family obligations relating directly to childbirth (FMLA only), adoption or placement of a foster child (up to 12 weeks).
- Care for a child, spouse, or parent with a serious health condition (up to 12 weeks).
- An employee's serious health condition that makes the employee unable to perform the employee's job (up to 12 weeks).
- Care for a member of the Armed Forces (including National Guard) who is a spouse, parent, child and certain other next of kin relatives (up to 26 weeks) (see Military Caregiver Leave under Military-Related FMLA Leave); or,
- Handle certain qualifying exigencies related to activities such as short notice deployment, military events, arranging alternative childcare, making financial and legal arrangements related to the deployment, rest and recuperation, counseling, parental care, and post- deployment debriefings (up to 12 weeks) (see Qualifying Exigency Leave under Military- Related FMLA Leave).

The maximum amount of leave that may be taken in a 12-month period for all reasons combined is 12 weeks, with one exception. For Military Caregiver leave, the maximum combined leave entitlement is 26 weeks, with leaves for all other reasons constituting no more than 12 of those 26 weeks.

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## Definition of Serious Health Condition

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

## Identifying the 12-Month Period

The Company measures the 12-month period in which leave is taken by the "rolling" 12-month method, measured backward from the date of any Family Medical Leave with one exception. For Military Caregiver, the Company calculates the 12-month period beginning on the first day the eligible employee takes FMLA leave to care for a covered service member and ends 12 months after that date. Family Medical Leave taken for bonding with newborn, adopted or foster care child must be concluded within 12 months of the birth or placement.

## Using Leave

Eligible employees may take Family Medical Leave in a single block of time, intermittently (in separate blocks of time) or by reducing the normal work schedule for:

- The Serious Health Condition of the employee or immediate family member, or in the case of a covered service member, their own injury or illness.
- Qualifying Exigency Leave; or
- Bonding with a newborn or newly placed child. Intermittent leave taken for bonding must be taken in minimum increments of one week or more (up to two exceptions will be granted) and must be completed within a year of the birth or placement of the child.

Employees who require intermittent or reduced-schedule leave must try to schedule their leave so that it will not unduly disrupt the Company's operations.

## Use of Accrued Paid Leave

Family and Medical Leave is unpaid. Employees participating in a paid sick leave plan must use accrued unused paid sick leave concurrently with Family Medical Leave except during times that workers' compensation or other disability benefits are available to the employee. This includes use of available paid sick leave during any elimination period for receipt of benefits.

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## Maintenance of Health Benefits

If you and/or your family participate in our group health plan, the Company will maintain coverage during your Family Medical Leave on the same terms as if you had continued to work. If applicable, you must make arrangements to pay your share of health plan premiums while on leave. In some instances, the Company may recover premiums it paid to maintain health coverage or other benefits for you and your family. Use of Family Medical Leave will not result in the loss of any employment benefit that accrued prior to the start of your leave.

## Notice and Medical Certification

When seeking Family Medical Leave, you are required to provide:

1. Sufficient information for us to determine if the requested leave may qualify for FMLA protection and the anticipated timing and duration of the leave. You must also inform the Company if the requested leave is for a reason for which FMLA leave was previously taken or certified.

Notice must be provided:

- If the need for leave is foreseeable: 30 days in advance of the anticipated beginning date of the leave.
  - If the need for leave is not foreseeable: as soon as is practicable and in compliance with the Company's normal procedures.
2. Medical certification supporting the need for leave due to a serious health condition affecting you or an immediate family member within 15 calendar days of the Company's request to provide the certification. Second or third medical opinions for an employee's own serious health condition may also be required.
  3. Periodic reports as deemed appropriate during the leave regarding your status and intent to return to work; and
  4. Medical certification of fitness for duty before returning to work if the leave was due to your serious health condition. The Company will require this certification to address whether you can perform the essential functions of your position.

Failure to comply with the foregoing requirements may result in delay or denial of leave.

## Employer Responsibilities

To the extent required by law, the Company will inform employees whether they are eligible under the FMLA. Should an employee be eligible for Family Medical Leave, the Company will provide the employee with a notice that specifies any additional information required as well as the employee's rights and responsibilities. If employees are not eligible, the Company will provide

a reason for the ineligibility. The Company will also inform employees if leave will be designated as FMLA-protected and, to the extent possible, note the amount of leave counted against the employee's leave entitlements. If the Company determines that the leave is not protected, the Company will notify the employee.

## Job Restoration

Upon returning from Family Medical Leave, eligible employees will typically be restored to their original job or to an equivalent job with equivalent pay, benefits and other employment terms and conditions to the extent available with the current or other client.

## Failure to Return After Family Medical Leave

Any subsequent request for Family Medical Leave beyond the original approved leave must be accompanied by a new Medical Certification Form and submitted to the Benefits department for review and approval. Any employee who fails to return to work as scheduled after FMLA leave or exceeds the 12-week entitlement (or in the case of military caregiver leave, the 26-week FMLA entitlement), will be subject to the Company's standard leave of absence and attendance policies. This may result in termination if you have no other Company-provided leave available to you that applies to your continued absence, and you failed to obtain requisite approval from the Benefits department. Likewise, following the conclusion of your FMLA leave, the Company's obligation to maintain your group health plan benefits ends (subject to any applicable COBRA rights).

## Employers' Compliance with FMLA and Employee's Enforcement Rights

The FMLA makes it unlawful for any employer to interfere with, restrain or deny the exercise of any right provided under the FMLA, or discharge or discriminate against any person for opposing any practice made unlawful by the FMLA or for involvement in any proceeding under or relating to the FMLA.

While the Company encourages employees to bring any concerns or complaints about compliance with the FMLA to the attention of your local HR representative or Customer Support Associate, you may also file a complaint with the U.S. Department of Labor or bring a private lawsuit against an employer.

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## Military Related FMLA Leave

There are two forms of Military-Related leave: Military Caregiver Leave and Qualifying Exigency Leave.

### Military Caregiver Leave

Unpaid Military Caregiver Leave is designed to allow eligible employees to care for certain family members who have sustained serious injuries or illnesses in the line of duty while on active duty. Military Caregiver Leave is a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. Any FMLA taken for any reason from the time of the incident going forward counts against the 26 weeks of leave but not anything used before that time. An employee seeking Military Caregiver

Leave may be required to provide appropriate certification from the employee and/or covered service member and it should be completed by an authorized health care provider within 15 days.

### Qualifying Exigency Leave

Eligible employees may take unpaid "Qualifying Exigency Leave" to tend to certain "exigencies" arising out of the covered active duty or call to covered active-duty status of a "military member."

Qualifying Exigency Leave is available under the following circumstances:

- **Short-notice deployment.** To address any issue that arises out of short notice (within seven days or less) of an impending call or order to a covered active duty.
- **Military events and related activities.** To attend any official military ceremony, program, or event related to covered active duty or call to covered active-duty status or to attend certain family support or assistance programs and informational briefings.
- **Childcare and school activities.** To arrange for alternative childcare; to provide childcare on an urgent, immediate need basis; to enroll in or transfer to a new school or daycare facility; or to attend meetings with staff at a school or daycare facility.
- **Financial and legal arrangements.** To make or update various financial or legal arrangements, or to act as the covered military member's representative before a federal, state, or local agency in connection with service benefits.
- **Counseling.** To attend counseling (by someone other than a health care provider) for the employee, for the military member, or for a child or dependent, when necessary, as a result of duty under a call or order to covered active duty.
- **Temporary rest and recuperation.** To spend time with a military member who is on short-term, temporary rest and recuperation leave during the period of deployment. Eligible employees may take up to 15 calendar days of leave for each instance of rest and recuperation.

- **Post-deployment activities.** To attend arrival ceremonies, reintegration briefings and events, and any other official ceremony or program sponsored by the military for a period of up to 90 days following termination of the military member's active-duty status. This also encompasses leave to address issues that arise from the death of a military member while on active-duty status.
- **Parental care.** To care for the military member's parent who is incapable of self-care.
- **Mutually agreed leave.** Other events that arise from the military member's duty under a call or order to active duty, provided that the Company and the employee agree that such leave shall qualify as an exigency and agree to both the timing and duration of such leave.

An employee seeking Qualifying Exigency Leave may be required to submit appropriate supporting documentation in the form of a copy of the military member's active duty or rest and recuperation orders or other military documentation indicating the appropriate military status and the dates of active-duty status, along with a statement setting forth the nature and details of the specific exigency, the amount of leave needed and the employee's relationship to the military member, within 15 days.

## Uniformed Services Employment and Reemployment Rights Act

The Uniformed Services Employment and Reemployment Rights Act (USERRA) protects service members' reemployment rights when returning from a period of service in the uniformed services, including those called up from the Reserves or National Guard, and prohibits employer discrimination based on military service or obligation. The Company complies fully with USERRA and similar state laws.

### Benefits

An employee on military leave is eligible to continue their health benefits for up to 24 months. The individual will be responsible for all payments for dependent coverage during this time. The employee can arrange payment either in one lump sum or pay it monthly. During the first 12 months of such benefit continuation, the cost will be the same as if the individual was still actively employed. If the leave of absence extends beyond 12 months, the cost will change to the COBRA rate for the remaining 12 months. Please contact the Benefits department to coordinate any changes in an employee's status.

### Reinstatement

The Company reinstates employees returning from military leave as required by USERRA. When you are released from service, please contact the Benefits department and your local HR representative or Customer Support Associate as soon as possible to discuss reinstatement.

## Request for Military Leave

Contract Employees called to military leave shall notify your Recruiter, Customer Support Associate, or Human Resources and provide a copy of their military orders or training notice (if available) to initiate the request for leave. Any questions regarding the status and/or approval of military leave should thereafter be directed to your Customer Support Associate, Human Resources, or the Benefits department.

## Anti-Human-Trafficking Policy

Populus Group and the United States Government prohibit trafficking in persons. Populus Group is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Populus Group will not tolerate or condone human trafficking or slavery in any part of our global organization.

Populus Group employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom Populus Group conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### Procedures

Report any conduct that you believe to be a violation of this policy to Populus Group's human resources department. Reports may also be made through the EthicsPoint Hotline at 844-781-8201 or via the internet at the following website: EthicsPoint, which allows anonymous reporting as permitted by applicable law.

Populus Group will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

## Other Important Policies and Procedures

### Lactation Break

Any Contract Employee that will require lactation breaks should provide advance notice to the Company, which allows the Company to work with its customer and the Contract Employee to ensure a reasonable amount of break time in a private room that is not a bathroom. The Company will respond within five business days to an employee's request for a room or location to express milk.

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Employees can take breaks at least once every three hours to pump and can also take breaks right before or after scheduled paid rest periods or meal breaks. Employees may take breaks “each time such employee has reasonable need to express breast milk” for up to three years following childbirth. If a non-exempt hourly employee does not have enough break time to cover the time needed to express milk, any additional time for a lactation break will be unpaid.

Retaliation against Contract Employees that request to express milk at work or a lactation accommodation is expressly prohibited. Contract Employees may report violations of their right to express milk or to request a lactation accommodation to their HR representative.

## Meal and Rest Periods

The Company complies with federal and state legal requirements concerning meal periods and rest breaks.

## Personal Appearance

Employees are expected to project a professional image that positively represents the Company. When working at a customer site, employees must comply with the customer’s dress code policy.

# Safety

## Reporting of Accidents and Hazards

It is the Company’s policy to provide medical care to employees experiencing an unintentional on-the-job injury or illness. Contract Employees must notify their Customer Support Associate or Recruiter and the customer supervisor immediately following an unintentional on-the-job injury or illness. Once reported, a medical facility is authorized to provide adequate medical care. To assist in the rehabilitation process following an on-the-job injury, the Company offers modified duty assignments to Contract Employees based on prescribed medical limitations.

## Procedures for Accident Reporting

The following steps must be followed by a Contract Employee who suffers an unintentional on-the-job injury or illness:

1. Notify the client supervisor and a Company representative immediately.
  - a. Reach out to your direct supervisor and Populus Group Representative.
2. In emergency situations, proceed to the nearest emergency medical facility and obtain temporary medical care.
  - a. If you need to find medical providers near you, please contact the Health and Safety team for further assistance.  
248-712-7931 or Workerscomp@populusgroup.com
3. Complete all required documents related to the event that can be obtained through your Customer Support Associate. Provide a detailed explanation of the event, including information such as the time, date, location, cause and effect of the event.

A Customer Support Associate must provide a listing of physicians, industrial clinics, and medical facilities in the area. Update your Recruiter or Customer Support Associate about the status of your health and ability to return to work.

## Workers' Compensation Fraud

All unintentional on-the-job injuries or illnesses claimed by Company Contract Employees are thoroughly investigated. Fraudulent claims are not tolerated and are pursued to the fullest extent.

## Violence-Free Environment

The Company will not tolerate violence in the workplace. Violence includes physical altercations, coercion, pushing or shoving, horseplay, intimidation, stalking, and threats of violence. Employees should not joke or make offhand remarks about violence. Any comments about violence will be taken seriously and may result in discipline up to and including immediate termination. Weapons of any kind, including but not limited to concealed weapons, are not allowed on the premises of the Company, the customer's premises, or any place where work is being performed, in accordance with applicable law.

## What to do in Case of Violence

If you observe an incident or threat of violence that you believe is imminent and may cause risk of injury or serious harm to you or others in the workplace, IMMEDIATELY DIAL 9-1-1 and report it to the police. If the incident or threat of violence does not appear to require immediate police intervention, please report it to your Recruiter, Customer Support Associate, the leader of the local office, or Human Resources as soon as possible. All complaints will be investigated, and appropriate action will be taken.

## Whistleblowing

The Company is committed to maintaining a workplace that promotes ethical conduct, transparency, and compliance with all applicable laws. In accordance with New York Labor Law § 740, employees are protected from retaliation when they report or disclose certain types of misconduct.

## Short Term Disability-State Offered Benefits

Some states may provide programs which offer short-term Disability Insurance and/or Paid Family Leave in form of wage replacement benefits to eligible workers who need time off work. If your state offers these benefits, you may be eligible if you are unable to work due to non-work-related illness or injury, pregnancy, or childbirth.

For more information, please contact the Benefits Team at [PGBenefits@PopulusGroup.com](mailto:PGBenefits@PopulusGroup.com).

## Solicitation and Distribution

The Company strives to create a work environment where employees have the time, tools, and support necessary to perform their jobs without distraction. In the interest of maintaining this work environment, The Company strictly regulates the solicitation of employees and the distribution of non-work-related literature to employees. Solicitation of employees for any non-work-related purpose, during working time is prohibited. Posting or distribution of non-work-related materials in any Company working area is also prohibited.

Employees are prohibited from distributing non-work-related material in The Company's working areas. Employees may distribute non-work-related material in non-working areas during non-working time but must obtain prior authorization from his/her manager to distribute non-work-related material during the Employee's working time or the working time of other employees. This does not apply to solicitation for Company related fundraising events that have been approved by The Company Leadership, which can occur during working hours and in working areas.

For purposes of this policy, "working time" means the period of time that an employee spends performing actual job duties and but does not include rest periods, meal breaks, and other specified times when employees are not expected to be working and "working areas" include all locations on The Company's premises where employees conduct work for The Company, but does not include break areas, cafeterias, social gathering areas, or parking lots where employees are not expected to be working. T The Company also reserves the right to regulate and remove non-work-related materials on company bulletin boards.

Nothing in this policy is intended to interfere with the rights protected under the National Labor Relations Act, or similar state law, which gives employees the right to engage in, as well as the right to refrain from engaging in protected concerted activity relating to terms and conditions of employment including but not limited to conduct for union organizational purposes.

## Timekeeping Procedures, Overtime and Pay

### Exempt/Non-Exempt Status

All positions in The Company are classified as either exempt (salaried) or non-exempt (hourly) pursuant to the applicable provisions of the Fair Labor Standards Act ("FLSA") and applicable state and local laws. Only positions classified as non-exempt are eligible for overtime compensation. All employees in non-exempt positions in The Company are strictly prohibited from conducting any work outside of their normal business hours, which includes not performing work on any Company issued or personal electronic device such as cell phones, smart phones, tablets, computers, PDAs, BlackBerrys, and/or laptops, without the prior approval of their supervisor or manager. Exempt employees may not be subject to certain salary deductions, and The Company will only take those deductions that are permitted under applicable law.

### Timekeeping

Each non-exempt employee is required to record his or her hours of work for The Company. Accurately recording all of your time is required in order to be sure that you are paid for all hours worked. You will be informed on your first day on the job whether you are required to keep your time by a time clock, a time sheet, or some other method. Whatever your method of timekeeping, you are expected to follow the established procedures in keeping an accurate record of your hours worked.

Additionally, when applicable, non-exempt employees must record any other non-working time (except breaks) such as time away from The Company for errands, doctor appointments, etc.

Any changes or corrections to your timecard or time record must be updated and approved by you and your supervisor. Under no circumstances may any employee record another employee's timecard or ask another employee to record his or her timecard. Recording another employee's timecard or asking another non-management employee to record your time may result in discipline, up to and including immediate termination.

### "Off-the-Clock" Time is Not Allowed

Comp time, banked time or "off-the-clock arrangements," in lieu of hours worked is strictly prohibited. All hours worked must be recorded appropriately and paid at the applicable straight time and/or overtime rate during the payroll period worked. If you are asked to hold, bank or under report time, report it immediately to Human Resources.

### Schedule

THE COMPANY pays employees for all time worked in accordance with our payroll schedule and in compliance with federal and applicable state/local law. Your supervisor will set your schedule. Populus Group's workweek runs from Sunday to Saturday.

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## Recoupment of Wages and/or Expenses Overpayment

Overpayments occur from time to time because of an error on the part of the employee, client, or in The Company's processing of your pay or expenses. For example, occasionally a clerical error or an incorrect timecard will result in a payment for more hours than were worked.

Should you receive an overpayment, under these or any other circumstances, The Company will recoup the overpayment to the extent allowed by law, including but not limited to, payroll deductions, repayment plans, or legal action. You must notify The Company immediately if you become aware of an overpayment. Unless otherwise prohibited by applicable law, your acknowledgement of the guidebook is authorization for correction of any overpayment of wages.

### Commissions

Some Company employees earn commissions. The details of any commission pay will be outlined in a commission agreement or commission policy. Please refer to your applicable Company commission agreement or compensation plan for additional details.

## Information Security

The Company is committed to ensuring the safety, security and privacy of personnel and Company data in adherence with data protection and data privacy laws. The goal of the Information Security Management Framework is to ensure all information assets identified with, owned by, or entrusted to the Company are protected in a manner consistent with the value attributed to them by the Company in accordance with business requirements, customer requirements and relevant laws and regulations. The Information Security Management Framework includes the following Company policies:

- **Information Security Policy** - contains important rules covering information security and establishes safeguards and controls to protect the Company's informational assets from loss and from unauthorized access, modification, destruction, or disclosure. This includes rules around storage of data and encryption of data.
- **Information Classification Policy** - provides guidelines for classifying the Company's information by sensitivity level and establishes consistent security requirements for classifying, labeling, handling, and disposing of information in a secure manner
- **Employee Privacy Policy** - outlines how the Company protects personal data, who it is provided to, or accessible by the Company and explains the Company's Global Privacy Principles
- **Acceptable Use Policy** - establishes acceptable use of the Company's electronic resources, including (but not limited to) desktop and laptop computers, personal digital assistants, cell phones, electronic mail ("e-mail"), Internet access, internal network resources ("intranet"), external network resources ("extranet"), file shares, SharePoint sites, telephones, voice mail, fax machines, multifunction devices/printers, software, applications, operating systems, databases and electronic storage media

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- **Social Media Policy** - provides guidance for acceptable/unacceptable uses of social media as well as information on the appropriate use of social media for certain roles in the Company such as employees in recruiting roles and employees in the Marketing department
  - **Records Retention Policy** – provides guidance for the proper storage, maintenance, and destruction of Company records

## The policies of the Information Security Management Framework:

- Apply to all Company personnel, including employees, Contract Employees, temporary workers, and any authorized representatives, independent contractors, or agents
- Apply regardless of whether the activities are conducted from the Company's premises
- Are mandatory and will be enforced worldwide
- Establish a minimum standard of acceptable conduct

Any employee who is found to have violated any of the policies of the Information Security Management Framework may be subject to discipline, up to and including immediate termination.

## Unauthorized Recording

To maintain the security of our premises and systems, The Company prohibits unauthorized photography or audio and video recording by an employee. Do not use a cell phone or any other device to make any type of unauthorized photograph or audio or video recording. Authorization for any type of recording requires the advance written approval of Human Resources. Violation of this policy may result in discipline, up to and including immediate termination. Nothing contained herein shall preclude an employee from engaging in conduct that is protected by Section 7 of the National Labor Relations Act.

## Verification of Employment and Personnel Files

Employees may review their personnel file in person, with their manager, at a time and place mutually convenient for both the employee and The Company. Employees must request such a review, in writing, to the Human Resources Department, or as required by applicable state law.

Employees may not remove items from their personnel file. Copies of documents that an employee has signed will be provided upon written request. Copies of additional documents will be provided at the discretion of The Company or as required by applicable state law.

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## Employee Handbook Acknowledgment Form

The employee guidebook describes information about Populus Group, and I understand that I should consult my supervisor regarding any questions not answered in the guidebook. I have entered into my employment relationship with Populus Group voluntarily and acknowledged that there is no specified length of employment. Accordingly, either Populus Group or I can terminate the relationship at will, with or without cause, at any time, so long as there is not violation of application federal or state law.

Since the information, policy and benefits described in the guidebook are necessarily subject to change, I acknowledge that revision to the guidebook may occur, except to Populus Group's policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only Populus Group's President, or Vice President of Human Resources has the ability to adopt any revision to the policies in this guidebook.

Furthermore, I acknowledge that this guidebook is neither a contract of employment nor a legal document. I understand that these policies are a guide that no guidebook can anticipate every circumstance or question about policy. I have received the guidebook and I understand that it is my responsibility to read and comply with the policies contained in the guidebook and any revisions made to it.

Employee's Signature: \_\_\_\_\_

Employee's Name: \_\_\_\_\_

Date: \_\_\_\_\_