

PANTZER

Employee Handbook

Standards of Performance

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Introduction

To employees who have recently joined Pantzer Operations, welcome! We are thrilled that you are part of the team. To our tenured employees, we appreciate your continued service and trust that you will assist new employees in their journey.

As a Pantzer employee, you are part of an organization that prides itself on exemplary customer service, innovation, efficiency, and unparalleled expertise in the industry. With your talents, team-focused mindset, and engagement, Pantzer will continue its success. We look forward to being part of your professional growth and personal success.

This Handbook is designed to communicate to all employees the policies and procedures of Pantzer Operations L.L.C., and affiliated companies (referred to collectively as the "Company"). As an employee of the Company, you are required to comply with the Company's rules, regulations, policies and procedures, whether contained in this Handbook or not. Failure to do so may result in disciplinary action, up to and including termination of employment.

No handbook can anticipate every circumstance or situation that you may encounter in the course of your employment with the Company. As the Company continues to grow, the need may arise, and the Company reserves the right to revise, supplement, or rescind any policies or portion of this Handbook as it deems appropriate, in its sole and absolute discretion, with or without notice. However, the Company may not be able to reprint this booklet each time a change is made. As a result, some of the material may become obsolete or may be outdated based on changes to federal, state, and local law. If any information contained in this Handbook is in conflict with any individual employment contract or information contained within Company policies or bulletins issued after the date of this Handbook, including policies or bulletins communicated to you by any electronic communication system, the information in those documents will govern.

This Handbook supersedes any and all previous handbooks and/or policy statements.

Last Updated 05/20/2024 12:10:03 ET

**6010****Employment at Will****Purpose**

Employment at Pantzer Operations is at will, which means the employee or the company may terminate employment at any time, for any reason, with or without notice.

Standard

- Employment with Pantzer Operations LLC and its affiliates is "at will," which means that it is for no definite period, and may be terminated at any time by either employees or the Company with or without cause, and with or without advanced notice and at any time.
- Neither this Handbook, nor any other Company policy, procedure or communication, shall create any right for any employee, guarantee employment for any period, or otherwise eliminate or modify the at will employment status.
- No representative of the Company, other than the Chief Executive Officer, in writing, may enter into any agreements, or make any representations, written or oral, to alter employees at will status or otherwise create a contractual obligation. Any such agreement must be in writing and signed by both the employee and the Chief Executive Officer.

Last Updated 05/20/2024 12:10:53 ET



Equal Employment Opportunity, ADA, and Accommodation

Purpose

Pantzer Operations provides equal employment opportunities to all qualified individuals without regard to race, creed, color, national origin, age, ancestry, religion, nationality, marital or domestic partnership or civil union status, sex (including pregnancy, childbirth or related medical conditions), gender identity or expression, physical or mental disability, military or veteran status, affectional or sexual orientation, atypical hereditary or cellular blood trait, genetic information or membership in any other legally-protected classification under federal, state, or local law. Our equal employment opportunity philosophy applies in all personnel actions including in recruiting, hiring, training, transfer, promotion job benefits, pay, performance evaluation, discipline, and dismissal.

Standard

General

- Pantzer will not allow any form of retaliation or harassment against individuals who raise issues of equal employment opportunity. If an employee feels he or she has been subjected to any type of retaliation, the employee should contact the HR Director and/or a member of the senior executive team.
- Ensure that qualified individuals with disabilities are treated in a nondiscriminatory manner in the pre-employment process and that employees with disabilities are treated in a nondiscriminatory manner with regard to all terms, conditions, and privileges of employment.
- The HR Director will keep all medical-related information confidential in accordance with the requirements of the ADA, as amended, and any other applicable federal or state laws, and retain such information in separate confidential files.
- Discrimination based upon the above categories, or retaliation against an individual who complains of such discrimination, will not be tolerated.
 - If an employee believes he or she is being discriminated against, the employee should immediately contact the HR Director or the Senior Vice President of Operations, without fear of retaliation of any kind.
- Violation of any aspect of this policy, including retaliation, will lead to discipline, up to and including termination.

Americans with Disabilities Act (ADA) and Reasonable Accommodation

- The Company complies with the Americans with Disabilities Act (ADA), as amended, and applicable state and local laws.
- The Company will provide a reasonable accommodation to qualified applicants and employees with disabilities if the reasonable accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship.
 - Employees may suggest specific reasonable accommodations that would allow them to perform the job. However, the Company is not required to make the specific accommodation requested and may provide an alternative, effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company.
- The Company is committed to engaging in an interactive process to determine the availability of a reasonable accommodation to any qualified individual who:
 - Requests and accommodation during the application process
 - Requests an accommodation to enable him/her to perform the essential job functions or gain access to company facilities
 - Asks for an accommodation to enjoy equal benefits and privileges of employment
- The Company prohibits retaliation. If employees or applicants feel that they or someone else may have been subjected to conduct that violates this Policy, they should report it immediately to the HR Director.
- Contact the HR Director with any questions regarding this policy.

Religious Accommodation

- Upon request, Pantzer will make every effort to reasonably accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on business operations.
- An accommodation may occur with respect to work schedules and religious holidays, company dress and grooming guidelines, or other aspects of employment.
 - The company will make reasonable attempts to accommodate employees who need time off to observe religious holidays that are not observed by the company. If approved, time off for unlisted religious holidays can be taken as

paid time off (PTO), a floating holiday if applicable, or leave without pay.

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Nondiscrimination/Anti-Harassment and Retaliation

Purpose

Title VII of the Civil Rights Act of 1964 prohibits discrimination and harassment in the workplace. In compliance with federal laws and in order to protect our employees while preventing any liability arising from discrimination or harassment claims, Pantzer Operations takes all appropriate measures to provide a workplace in which all individuals are treated with respect and dignity.

"Discrimination" is any unequal or different treatment of an individual based on a protected class, including race, color, age, national origin, religion, sex (including gender identity, sexual orientation, and pregnancy), disability, genetic information, or any other status protected under applicable federal, state, or local law.

"Harassment" is any conduct that is based on an individual's protected class or characteristic as defined above and that a reasonable person may find hostile, offensive, and unrelated to Pantzer's business interest.

Pantzer Operations prohibits retaliation in compliance with applicable Equal Employment Opportunity (EEO) laws which serve to protect our employees from harm when reporting harassment and discrimination in the workplace.

"Retaliation" is the punishing of employees or job applicants for asserting their rights to be free from employment discrimination including harassment. It may include any action or threat of action (whether job related or not, made on or off work premises, or occurring during or outside of working hours) that could discourage an employee from coming forward to make or support claim of harassment or discrimination.

Standard

Scope

- This policy applies to all Pantzer employees doing business on behalf of Pantzer in the "workplace," which is defined as the following:
 - All locations on or off Pantzer premises where company business or related activities are conducted, including but not limited to client job sites, while traveling for company business, and company-sponsored events or parties.
 - All forms of communication through which Pantzer business is conducted, including but not limited to in-person interactions, over calls, via texts, emails, or social media messages, and any other means used during working or nonworking hours and on company-owned or personal devices.

Nondiscrimination

- Employees are prohibited from discriminating in the workplace against individuals conducting business with or on behalf of Pantzer, including but not limited to coworkers, interns, applicants for employment, independent contractors/vendors, customers, clients, residents, and visitors.
- Circumstances that may constitute discrimination include but are not limited to:
 - Offensive or derogatory remarks about a person's protected class
 - Demoting or firing someone because of a person's protected class
 - Wage variations based on a protected class for individuals performing the same job
- Refer to the U.S. Department of Justice's website for information on federal Fair Housing laws and discriminatory practices.
- Any employee who believes he or she has experienced discrimination, has witnessed it occurring, or suspects it is occurring is encouraged to report it to a supervisor, manager, or the HR Director.
- Any employee who engages in any form of discrimination in the workplace will be subject to disciplinary action, up to and including termination.

Anti-Harassment

- Employees are prohibited from engaging in any form of harassment in the workplace towards individuals conducting business with or on behalf of Pantzer, including but not limited to coworkers, interns, applicants for employment, independent contractors/vendors, customers, clients, residents, and visitors.
- Circumstances that may constitute harassment include but are not limited to:
 - Degrading comments, jokes, slurs, and name-calling
 - Offensive materials, objects, or pictures

- Physical assaults or threats
- Unwelcome touch
- Intimidation, ridicule, mockery, or pranks
- Interference with an individual's work performance
- Employees should be aware that sexual harassment is a form of harassment. See [Sexual Harassment Prevention](#) for more information.
- Any employee who believes he or she has experienced harassment, has witnessed it occurring, or suspects it is occurring is encouraged to report it to a supervisor, manager, or the HR Director.
- Any employee who engages in any form of harassment in the workplace will be subject to remedial action (e.g., counseling) and/or disciplinary action, up to and including termination.
- Employees are prohibited from retaliating against a coworker who makes a good-faith claim of harassment or who assists in an investigation.
- All employees, including managers and supervisors, are required to cooperate with any internal investigation of harassment as necessary.

Retaliation

- The Company will neither engage in nor tolerate unlawful retaliation of any kind against any person who makes a good faith complaint of unlawful discrimination or harassment or who serves as a witness or otherwise participates in an investigatory process.

Policy Awareness

- A copy of this policy must be provided to each new employee upon hiring, and the employee must sign and return the attached Acknowledgment of Anti-Harassment Policy.
- A copy of this policy must be posted prominently with other government-required signage at all Pantzer work locations.
- Employees should contact the HR Director with any questions regarding this policy.

Procedure

Supervisor Responsibilities

1. Report all forms of harassment, discrimination, and retaliation as soon as you become aware of such conduct.
2. Complaints must be reported to the HR Director or Senior Vice President of Operations so that the Company can investigate the allegations and take corrective action, if appropriate.

Complaint Procedure

1. To ensure that we are providing you with a safe and respectful work environment, we must learn of issues in order to correct them. The effectiveness of our efforts depends in part on you telling us about inappropriate workplace conduct. If you feel that you or someone else may have been subjected to conduct that violates this policy, you must report it immediately. Refer to [Open Communications with Management](#) for additional information.
2. If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly report the conduct, either orally or in writing. You may speak to, write, or otherwise contact any of the following resources at the Company:
 - a. Your direct supervisor
 - b. The HR Director
 - c. The Senior Vice President of Operations
 - d. EthicsPoint, the anonymous ethics hotline, available to safely report any violations or to receive additional information.
 - Mobile: panconj.navexone.com
 - Online: pancomanagement.ethicspoint.com
 - Phone: 844-782-0459
3. If you do not report discriminatory, harassing or retaliatory conduct, the Company may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action.

Investigations

1. The Company will promptly conduct a fair and impartial investigation of any complaint of discrimination, harassment, or retaliation.
 - a. The Company will keep the investigation as confidential as possible and disclose the complaint of discrimination or harassment only to the extent necessary to make a thorough investigation or as necessary to take appropriate corrective measures. Only those who need to know about a complaint will be advised of its existence.
 - b. If it is determined that conduct in violation of the anti-discrimination or anti-harassment policy has occurred, the Company will act promptly to take corrective action to stop the offending conduct, and where appropriate, disciplinary action will be taken, up to and including termination of employment.
2. Employees who make good-faith reports or participate in the investigation will not be penalized for following these procedures.

3. Any individual who knowingly and intentionally makes a false accusation of discrimination, harassment, or retaliation against another individual for the purpose of harming, embarrassing, or retaliating against the individual will be subject to disciplinary action, up to and including termination.

Resources

Related Forms

- Acknowledgment of Anti-Harassment Policy
- EthicsPoint Supplemental Document 1
- EthicsPoint Supplemental Document 2

Last Updated 03/02/2023 12:57:02 ET

Attachments

Acknowledgment of Anti-Harassment Policy

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Sexual Harassment Prevention

Purpose

Sexual harassment is a form of employment discrimination which violates Title VII of the Civil Rights Act of 1964. Pantzer Operations takes all necessary measures to prevent and correct sexual harassment in the workplace in order to protect our employees and prevent any liability resulting from sexual harassment claims.

According to the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as any unwelcome sexual advances, requests for sexual favors, or any verbal or physical harassment of a sexual nature when: "1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create an intimidating, offensive, or hostile work environment." (EEOC)

Standard

Scope

- This policy applies to all Pantzer employees doing business on behalf of Pantzer in the "workplace," which is defined as the following:
 - All locations on or off Pantzer premises where company business or company-related activities are conducted, including but not limited to client job sites, while traveling for company business, and company-sponsored events or parties.
 - All forms of communication through which Pantzer business is conducted, including but not limited to in-person interactions, over calls, via texts, emails, or social media messages, and any other means used during working or nonworking hours and on company-owned or personal devices.

Sexual Harassment

- Sexual harassment is a form of harassment based on sex.
- Some examples of sexual harassment are:
 - Submission to sexual conduct is made either explicitly or implicitly a term or condition of an individual's employment (for example, a supervisor takes an applicant out for a drink, they engage in sexual conduct, and the supervisor offers the applicant the job).
 - Submission to or rejection of sexual conduct or advances by an individual is used as the basis for employment decisions (for example, if you go on a date with me, I will consider you for a promotion).
 - Conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment (e.g., using, displaying or communicating sexually suggestive or offensive words, objects, pictures, calendars, articles, letters, email messages, computer programs or internet sites).
- Sexual harassment can be physical and/or psychological in nature. An aggregation of a series of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.
- The Company will not tolerate any form of sexual harassment, regardless of whether it is:
 - Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, suggestive or obscene letters, unwelcome sexual advances or requests for sexual favors).
 - Physical (for example, assault, inappropriate physical contact or impeding, or blocking movements).
 - Visual (for example, displaying sexually suggestive posters cartoons or drawings, sending inappropriate adult-themed gifts, leering or making sexual gestures).
- Sexual harassment of employees occurring in the workplace or in other settings will not be tolerated, and those who are found to have engaged in such behavior can be subject to discipline, up to and including termination.

Policy Requirements

- Employees are prohibited from engaging in any form of sexual harassment in the workplace towards individuals, regardless of their sex or gender, who are conducting business with or on behalf of Pantzer, including but not limited to coworkers, interns, applicants for employment, independent contractors/vendors, customers, clients, residents, and visitors.
- Employees should understand that sexual harassment is a form of discrimination. See [Nondiscrimination/Anti-Harassment and Retaliation](#) for more information.
- Employees must also be familiar with and comply with any state and/or local laws regarding sexual harassment.
- Any employee who engages in sexual harassment in the workplace will be subject to remedial action (e.g., counseling) and/or disciplinary action, up to and including termination.

- Employees are prohibited from retaliating against a coworker who makes a good-faith claim of sexual harassment or who assists in an investigation.
- Any employee who believes he or she has experienced sexual harassment, has witnessed it occurring, or suspects it is occurring in the workplace is encouraged to report it to a supervisor, manager, or the HR Director.
- Any manager or supervisor who receives a complaint of alleged sexual harassment or otherwise learns of a possible occurrence is required to report it to the HR Director, which is responsible for investigating all reports.
 - Managers and supervisors are also required to refer to the HR Director any reported claims of a non-employee sexually harassing an employee in the workplace.
- All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment as necessary.

Policy Awareness

- Pantzer requires all employees to complete sexual harassment prevention training annually.
- A copy of this policy must be provided to each new employee upon hiring, and the employee must sign and return the attached Acknowledgment of Sexual Harassment Prevention Policy.
- A copy of this policy must be posted prominently with other government-required signage at all Pantzer work locations.
- Employees should contact the HR Director with any questions regarding this policy.

Procedure**Supervisor Responsibilities**

1. Supervisors have an obligation to report all forms of harassment, discrimination, and retaliation as soon as they become aware of such conduct. Supervisors who observe such conduct or who receive any complaints of misconduct must report the conduct or complaint to the HR Director or Senior Vice President of Operations so that the Company can investigate the allegations and take corrective action, if appropriate.

Complaint Procedure

1. To ensure that we are providing you with a safe and respectful work environment, we must learn of issues in order to correct them. The effectiveness of our efforts depends in part on you telling us about inappropriate workplace conduct. If you feel that you or someone else may have been subjected to conduct that violates this policy, you must report it immediately.
2. If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly report the conduct, either orally or in writing. You may speak to, write or otherwise contact any of the following resources at the Company:
 - a. Your direct supervisor
 - b. The HR Director
 - c. The Senior Vice President of Operations
3. If you do not report discriminatory, harassing or retaliatory conduct, the Company may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action.

Investigations

1. The Company will promptly conduct a fair and impartial investigation of any complaint of discrimination, harassment, or retaliation.
 - a. The Company will keep the investigation as confidential as possible and disclose the complaint of discrimination or harassment only to the extent necessary to make a thorough investigation or as necessary to take appropriate corrective measures. Only those who need to know about a complaint will be advised of its existence.
 - b. If it is determined that conduct in violation of the anti-discrimination or anti-harassment policy has occurred, the Company will act promptly to take corrective action to stop the offending conduct, and where appropriate, disciplinary action will be taken, up to and including termination of employment.
2. Employees who make good-faith reports or participate in the investigation will not be penalized for following these procedures.
3. Any individual who knowingly and intentionally makes a false accusation of discrimination, harassment, or retaliation against another individual for the purpose of harming, embarrassing, or retaliating against the individual will be subject to disciplinary action, up to and including termination.

Resources**Related Attachment**

- Acknowledgment of Sexual Harassment Prevention Policy

Last Updated 09/02/2021 13:20:58 ET

Attachments

Acknowledgment of Sexual Harassment Prevention Policy



Conflict of Interest - Property Management

Purpose

You have previously indicated that you have read and understand the Pantzer Properties (the "Company") employment Manual. The Company has adopted a policy of reaffirmation regarding specific portions of the Manual, although all provisions are important.

Standard

Professionalism

Employees must understand and comply with all applicable laws, rules, and regulations of any government, regulatory organization, licensing agency, or professional association governing their professional activities. In the event of a conflict, Employees must comply with the more strict law, rule, or regulation. Employees must not knowingly participate or assist in and must dissociate from any violation of such laws, rules, or regulations.

Employees must use reasonable care and judgment to achieve and maintain independence and objectivity in their professional activities. Employees must not offer, solicit, or accept any gift, benefit, compensation, or consideration that reasonably could be expected to compromise their own or another's independence and objectivity.

Employees must not engage in any conduct involving dishonesty, fraud, or deceit or commit any act that reflects adversely on their professional reputation, integrity, or competence.

Duties to the Company

Employees must not accept gifts, benefits, compensation, or consideration that competes with or might reasonably be expected to create a conflict of interest with the Company's interest unless they obtain written consent from all parties involved.

Employees are NOT permitted to purchase or sell securities issued by real estate OR purchase or sell IPOs or private placements (including investing in any private equity/hedge funds) unless they have first received pre-approval from the Chief Compliance Officer.

Contact the Chief Compliance Officer at least three days before making a political contribution and provide information about the proposed contribution, such as the intended recipient of the contribution, the amount of the proposed contribution, and any other pertinent information.

Employees must make reasonable efforts to ensure that anyone subject to their supervision or authority complies with applicable laws, rules, regulations, and the Manual.

Conflicts of Interest

Employees must make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with their respective duties.

Concurrent employment by or holding an interest in an organization that is a competitor of or supplier to the Company or any affiliate; accepting free/discounted goods from any organization that does or seeks to do business with the Company or any affiliate; being employed/retained or serving on the board of an organization that does or seeks to do business with Company or any affiliate is considered a conflict of interest and prohibited. If an employee has questions regarding whether a particular relationship is a conflict of interest, the employee should contact the Chief Compliance Officer prior to engaging in any such relationship.

Personally profiting (monetary or otherwise) from an organization, entity or person that does or seeks to do business with the Company or any affiliate is prohibited. Employees may not give or receive money or gifts with a value of \$25 or more from a customer, vendors, government official, or any person, entity or organization doing or seeking to do business with the Company or

any affiliate. In this instance, the employee must take the gift to management or the HR Director so that it can be used in a manner benefiting the entire organization such as an employee raffle, donated to charity, and so forth.

Exceptions may be made for business-related meals, and for gifts of nominal value that are customary and lawful, and are authorized in advance.

Employees are responsible to report any real or potential conflicts of interest that may exist between their immediate family and the Company or any affiliate. Immediate family members include spouse, children, and anyone else living in the same household as the member or employee. Employees should report any real or potential conflicts of interest to their direct supervisor, the HR Director or the Chief Compliance Officer.

Last Updated 03/20/2023 10:55:27 ET

**Conflict of Interest - Analyst****Purpose**

You have previously indicated that you have read and understand the Pantzer Properties (the "Company") employment Manual. The Company has adopted a policy of reaffirmation regarding specific portions of the Manual, although all provisions are important.

Standard**Professionalism**

Employees must understand and comply with all applicable laws, rules, and regulations of any government, regulatory organization, licensing agency, or professional association governing their professional activities. In the event of a conflict, Employees must comply with the more strict law, rule, or regulation. Employees must not knowingly participate or assist in and must dissociate from any violation of such laws, rules, or regulations.

Employees must use reasonable care and judgment to achieve and maintain independence and objectivity in their professional activities. Employees must not offer, solicit, or accept any gift, benefit, compensation, or consideration that reasonably could be expected to compromise their own or another's independence and objectivity.

Employees must not knowingly make any misrepresentations relating to investment analysis, recommendations, actions, or other professional activities.

Employees must not engage in any conduct involving dishonesty, fraud, or deceit or commit any act that reflects adversely on their professional reputation, integrity, or competence.

Integrity Of Capital Markets

Employees who possess material nonpublic information that could affect the value of an investment must not act or cause others to act on the information.

Employees must exercise due care to ensure that any material, non-public information in their possession remains secure at all times. Evidence of any improper handling of, or any tampering with the security of, material, non-public information must be reported immediately.

If an employee believes that they may have received material, non-public information, you must immediately consult the Chief Compliance Officer and must refrain from trading in the related securities personally or for a client and refrain from disclosing the information to anyone inside or outside the Company pending further instructions.

Duties to Clients

Employees have a duty of loyalty to the Company's clients and must act with reasonable care and exercise prudent judgment. Employees must act for the benefit of the Company's clients and place clients' interests before the Company's or their interests.

Employees must deal fairly and objectively with clients when providing investment analysis, making investment recommendations, taking investment action, or engaging in other professional activities.

Where employees are responsible for managing a portfolio to a specific mandate, strategy, or style, they must make only investment recommendations or take only investment actions that are consistent with the stated objectives and constraints of the portfolio.

When communicating investment performance information, Employees must make reasonable efforts to ensure that it is fair, accurate, and complete.

Employees must keep information about current, former, and prospective clients confidential unless:

- i. The information concerns illegal activities on the part of the client or prospective client,
- ii. disclosure is required by law, or
- iii. The client or prospective client permits disclosure of the information.

Duties to the Company

Employees must not accept gifts, benefits, compensation, or consideration that competes with or might reasonably be expected to create a conflict of interest with the Company's interest unless they obtain written consent from all parties involved.

Employees are NOT permitted to purchase or sell securities issued by real estate OR purchase or sell IPOs or private placements (including investing in any private equity/hedge funds) unless they have first received pre-approval from the Chief Compliance Officer.

Contact the Chief Compliance Officer at least three days before making a political contribution and provide information about the proposed contribution, such as the intended recipient of the contribution, the amount of the proposed contribution, and any other pertinent information.

Employees must make reasonable efforts to ensure that anyone subject to their supervision or authority complies with applicable laws, rules, regulations, and the Manual.

Investment Analysis, Recommendations, and Actions

Employees must exercise diligence, independence, and thoroughness in analyzing investments, making investment recommendations, and taking investment actions. Recommendations and analysis must have a reasonable and adequate basis, supported by appropriate research and investigation.

Employees must use reasonable judgment in identifying which factors are important to their investment analyses, recommendations, or actions and include those factors in communications with clients and prospective clients. Fact and opinion should be clearly distinguished in the presentation of investment analysis and recommendations.

Employees must develop and maintain appropriate records to support their investment analyses, recommendations, actions.

Conflicts of Interest

Employees must make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with their respective duties.

Concurrent employment by or holding an interest in an organization that is a competitor of or supplier to the Company or any affiliate; accepting free/discounted goods from any organization that does or seeks to do business with the Company or any affiliate; being employed/retained or serving on the board of an organization that does or seeks to do business with Company or any affiliate is considered a conflict of interest and prohibited. If an employee has questions regarding whether a particular relationship is a conflict of interest, the employee should contact the Chief Compliance Officer prior to engaging in any such relationship.

Personally profiting (monetary or otherwise) from an organization, entity or person that does or seeks to do business with the Company or any affiliate is prohibited. Employees may not give or receive money or gifts with a value of \$25 or more from a customer, vendors, government official, or any person, entity or organization doing or seeking to do business with the Company or any affiliate. In this instance, the employee must take the gift to management or the HR Director so that it can be used in a manner benefiting the entire organization such as an employee raffle, donated to charity, and so forth.

Exceptions may be made for business-related meals, and for gifts of nominal value that are customary and lawful, and are authorized in advance.

Employees are responsible to report any real or potential conflicts of interest that may exist between their immediate family and the Company or any affiliate. Immediate family members include spouse, children, and anyone else living in the same household as the member or employee. Employees should report any real or potential conflicts of interest to their direct supervisor, the HR Director or the Chief Compliance Officer.

Last Updated 03/20/2023 10:54:16 ET



Purpose

Safeguarding confidential business information is critical to protecting Pantzer Operations's interests and success. Confidential information is any and all information about Pantzer that is not generally known by people outside of the company. Because of the importance of maintaining the confidentiality of certain information, and because effective confidentiality protocols require employees' involvement and cooperation, the Company expects all employees to comply with this policy.

Standard

Confidentiality and Non-Disclosure

- The Company keeps certain types of information confidential for important business and legal reasons including maintaining the Company's competitive edge, protecting the Company's rights and safeguarding the sensitive information of our tenants, employees, and the Company.
- During the term of employment, employees will have access to and become acquainted with confidential business information that is vital to the interests and the success of the Company.

Definition of Confidential Information

- Confidential information includes, but is not limited to, all information belonging to the Company and not generally known in spoken, printed, electronic or any other form or medium relating, directly or indirectly to business practices, policies and procedures, plans of the Company, strategies, agreements and contracts, pending or future transactions, trade secrets, negotiations, computer and IT Resources information, accounting information and records, personnel information, financial information, tenant identities, tenant balances, tenant activities, vendor information.
- Confidential information also includes other information that is marked or otherwise identified as confidential or proprietary, or information that would otherwise appear to a reasonable person to be confidential or proprietary in the context and circumstances in which the information is known or used, other than the employee's terms and conditions of employment.

Protecting Confidential Information

- Employees should treat the Company's trade secrets, intellectual property, financial information, information regarding tenants, vendors and fellow employees as confidential and not do anything to jeopardize or unwittingly disclose that information through the use of social media and online activities.
- Additionally, employees should avoid misappropriating or infringing on the intellectual property of other companies and individuals, which can create liability for the Company.

Protocols for Maintaining Confidentiality

- Employees must safeguard, and are expressly forbidden to disclose, any of this information, directly or indirectly, or use this information in any way, whether during their employment (except, of course, as required in fulfilling one's responsibilities) or after termination of employment. Should an employee improperly use or disclose confidential business information, he or she will be subject to disciplinary action, up to and including termination of employment and/or legal action.
- The Company limits disclosure of its confidential information to:
 - Employees with a need to know in order to perform their jobs.
 - Third parties requiring the information for a legitimate business purpose.
- To maintain the confidentiality of the Company's confidential information, employees must follow these protocols except as otherwise provided by this policy:
 - Employees should not access or use any confidential information to which the Company has not provided them access or authorization to use.
 - Employees should not directly or indirectly disclose, publish, communicate, or make available confidential information to any entity or person that does not have a need or the authority to know and use the information, except as required to perform authorized job duties or otherwise permitted by this policy.
 - If authorized job duties require sharing confidential information with a third party, employees must not do so until the Company gives consent or authorization. Confidential information cannot be removed from Company premises unless specifically authorized to do so.
 - Employees should not discuss confidential information in public where it may be overheard, including elevators, restaurants, cabs, and public transportation.

- In the event of an inadvertent disclosure of Confidential Information, employees must immediately inform their supervisor so that measures can be taken to minimize damage to the Company.
- Departing employees must return any Confidential Information in their possession to the HR Director upon separation from employment with the Company, and will be required to sign a form acknowledging their return of confidential information.
- This policy is not intended to restrict employee communications or actions that are protected or required by state or federal law, including discussing terms and conditions of employment/exercising protected rights under the National Labor Relations Act (e.g., discussing wages and terms and conditions of employment), or otherwise disclosing information as permitted or required by law.
 - Additionally, this policy does not prohibit or restrict any employee from initiating communications with, responding to any inquiry from, or providing testimony before the Securities and Exchange Commission (SEC), the Financial Industry Regulatory Authority (FINRA), any other self-regulatory organization, or any other state or federal regulatory authority regarding a possible securities law violation.
- If unsure whether information should be kept confidential, employees should always check with their supervisor or the HR Director before disclosing the information or taking any other action.
- Any employee who violates this policy may be subject to disciplinary actions, up to and including termination of employment.

Last Updated 09/02/2021 10:17:57 ET

**6040**

Open Communications with Management

Purpose

Pantzer Operations strives to create a culture where employees may speak openly with members of the management team.

Standard

- Employees are encouraged to discuss any questions, concerns, or ideas they may have with their manager and/or anyone in a management role, including company executives and the HR Director.
- If any work issue is causing an employee concern, he or she has the responsibility to address the concern with a manager.
- If the employee is not comfortable discussing the concern with his or her supervisor, the employee should contact the Regional Vice President, Senior Vice President of Operations, or the HR Director.

Last Updated 08/17/2020 00:05:16 ET



Purpose

Pantzer Operations has established cybersecurity guidelines as part of our commitment to protect the confidentiality of our customers' personal information and to safeguard sensitive, proprietary company information.

Standard

- This policy applies to all employees who are authorized to access to Pantzer's electronic systems, networks accounts, and databases, whether through company-issued computers/devices or personal electronic devices.
- In order to minimize the risk of cyberattack, employees must:
 - Complete all assigned cybersecurity training in Grace Hill and follow all recommendations provided.
 - Take all necessary precautions to prevent security breaches as outlined in the below procedures.
 - Implement and maintain all applicable security technology as directed by the IT department.
- Employees are prohibited from providing usernames, passwords, passphrases, PINs, or other means of access to Pantzer's IT resources (computers, devices, systems, accounts, databases, etc.) to individuals who are not authorized by Pantzer to receive such access.
- Any employee who discovers a security breach, or suspects one may have occurred, is required to report it immediately to his or her supervisor or the IT department.
- Also see Conduct – Use of IT Resources.

Procedure

General Safeguards

1. Turn off or lock your computer before leaving your desk or work area.
2. Lock laptops in a secure area before leaving for the day.
3. Never leave your laptop or handheld device unattended.
4. While traveling, carry devices in a bag.
5. If you must leave your laptop in the car, lock it in the trunk.
6. When away from the office, connect to the internet via virtual private network (VPN) or personal/mobile hotspot whenever possible. Never use public wireless networks that are not password protected.
7. Never turn off antivirus protection software or remove security features without approval from the IT department.

Password/Passphrase Security

1. Create strong passwords of at least eight characters with a mix of letters, numbers, and characters.
 - a. Do not use personal information that might be easy to guess (e.g., your name, birthday, pet's name, etc.).
2. Whenever extra security is required, create longer passphrases with phonetic replacements or deliberate misspellings (e.g., EyeLuv2WeRk17#@).
3. Do not use the same password/passphrase for all of your company accounts.
4. Do not use the same passwords for company accounts that you use for personal accounts.
5. Click "No" when sites ask to remember your password.
6. Never enter your passwords/passphrases into emails, text messages, or other forms of electronic communication.
7. Do not store passwords/passphrases in a computer files or on mobile devices without encryption.
8. Never share your passwords/passphrases with anyone.
9. Whenever possible, enable two-factor authentication (i.e., a fingerprint scan, receiving a text message, or using a PIN).

Electronic Links and Attachments

1. If you receive an email, text, or social media message from a sender you do not recognize, do not respond to the message or click on any links or attachments.
 - a. If it is an email requesting sensitive, private information, it may be someone attempting to install a virus by "spoofing" the return address. Validate the email by doing the following:
 - Hover over the name of the sender. If valid, the correct email address will show.
 - Find a legitimate phone number for the company the sender may be spoofing, and call the company directly to inquire about the message.
2. If you have any doubts about the legitimacy of a message, delete it and report the situation to the IT department.

Mobile Device Security

1. Disable wireless functions (e.g., Bluetooth) when you are not using them.
2. Enable remote tracking on your device in case it is lost or stolen.
3. Set the lock feature to immediately lock when not in use.
4. Turn on the feature that erases all of your data if someone tries and fails to log in 10 consecutive times.
5. Document the device's serial number to assist with identification if the device is stolen.

Disposal of Data

1. Upload sensitive data to Pantzer's shared drive rather than your computer's hard drive.
2. Set your computer to automatically empty the recycle bin on your hard drive.
3. Before discarding a personal device or returning a company-owned device to the IT department, run the Secure Erase command to overwrite all data on your hard drive.

Last Updated 11/01/2021 18:07:11 ET



6044

Pre-Employment – Reference Checks, Background Checks, and Drug Screening

Purpose

In order to obtain the highest quality job candidates, Pantzer Operations includes reference checks, criminal background checks, credit checks and drug screens as a standard part of the hiring process.

Standard

Reference Checks

- The manager will check references before extending a contingent offer of employment.
- A minimum of two references or two most recent employers must be obtained.
- If a manager wishes to hire a candidate who has a negative reference, the manager must discuss the hiring decision with the Regional Manager and Regional Vice President regardless of the number of positive references the candidate has.
- References are confidential and should not be shared with the applicant.

Background Check

- Human resources will conduct a background check through a third-party including the following searches:
 - Criminal Records Search
 - Social Security Death Master Search
 - National Sex Offender Registry
 - Government Sanctions Registry
 - TransUnion Credit Report
 - Motor Vehicle Records

Drug Screening

All candidates who have received a written offer of employment will be required to undergo testing for commonly abused controlled substances in accordance with this policy.

- Upon receipt of an offer of employment, candidates must complete required drug testing within 72 hours. All testing will be conducted by a licensed independent medical laboratory, which will follow testing standards in accordance with state law. Testing will be conducted on a urine sample provided by the candidate to the testing laboratory under procedures established by the laboratory to ensure privacy of the employee, while protecting against tampering/alteration of the test results.
- **Pantzer Operations** will pay for the cost of the testing, including the confirmation of any positive test result by gas chromatography. The testing lab will retain samples in accordance with state law, so that a candidate may request a retest of the sample at his or her own expense if he or she disagrees with the initial test result.
- Candidates will be tested for use of the following:
 - THC (with the exception of candidates who reside in MA, NJ, NY, VA, PA, CT, ME, DC)
 - Cocaine
 - Opiates
 - Amphetamines (amphetamine and methamphetamine)
 - Phencyclidine (PCP)
 - Barbiturates
 - Benzodiazepines
 - Methadone
 - Propoxyphene
 - Chemical derivatives of these substances
- Candidates must advise the testing lab of all prescription drugs taken in the past month before the test and be prepared to show proof of such prescriptions to testing lab personnel.
- Candidates who refuse to submit to a drug test or who fail to show up for a drug test within 24 hours of an offer of employment will no longer be considered for employment, and any offer of employment will be rescinded.

Procedure

Reference Checks

1. Make every effort to obtain candidate information from references, understanding, however, that many employers refuse to give references.

Approval

1. Once the candidate has been approved for hire, confirm the contingent offer.
2. Establish a start date with the candidate.

Resources

- Reference Check – Form and Questions

Last Updated 06/24/2026 13:52:17 ET

Attachments

Reference Check Form



6045

Employment – Employee Classification

Purpose

Pantzer Operations is committed to paying all employee wages accurately and timely, and maintains compensation practices consistent with all laws governing wages and hours, including the Fair Labor Standards Act (FLSA). Accordingly, each job within the company is classified per the FLSA.

Standard

- An employee's status will be categorized as follows:
 - **Exempt:** Employees are paid on a salaried basis and are not eligible for overtime pay.
 - **Nonexempt:** Employees are typically paid on an hourly basis and are eligible to receive overtime pay for overtime hours worked.
 - **Regular, Full-Time:** Employees (exempt and nonexempt) who work on average 40 hours per week and are eligible for full benefits, subject to the terms of each benefit program.
 - **Regular, Part-Time:** Employees who are regularly scheduled to work less than 40 hours a week. Those employees who work more than 30 hours a week are generally eligible to receive Company-paid health and life insurance coverage on the same basis as full-time employees, subject to the terms set forth in applicable plan documents. Employees who work less than 30 hours per week are not eligible to participate in any Company insurance program.
 - **Temporary:** Employees who are employed on a seasonal, project, or other temporary basis. Temporary employees are not eligible for benefits.
- The company will notify the employee upon initial hire as to whether the position is considered exempt or nonexempt.
- If the employee changes positions during employment as a result of promotion, transfer, or otherwise (including a change in current position duties), the employee will be informed by the manager and/or the HR Director of any exemption status change.

Procedure

1. Contact the HR Director with any questions regarding employee classification or compensation practices and philosophy.

Last Updated 09/02/2021 10:07:06 ET

**Purpose**

Pantzer Operations encourages the use of direct deposit for all payroll checks.

Standard

- Employees are paid on a biweekly basis with 26 paydays in the year.
- Paychecks are directly deposited to the employee's personal checking and/or savings account each payday.
 - It is the responsibility of the employee to complete the Direct Deposit information if he or she wishes to change the deposit amount or bank account to which the paycheck is deposited. Failure to update information could result in a delay of the employee's payroll funds.
- If an employee chooses not to participate in direct deposit, live checks will be sent to the property.
- Pay statements itemize deductions from gross earnings. Mandated deductions include Social Security, federal/state income tax, other appropriate taxes, as well as any court-ordered garnishments.

Procedure**Setting Up Direct Deposit**

1. Complete the Direct Deposit information located within [ADP](#).
2. If you wish to deposit a portion of your pay into a checking account and a portion into a savings account, indicate the amount to be deposited into each account.
3. If you change bank accounts or want to change your deposit amount, make the change within [ADP](#).
4. After setting up direct deposit, allow approximately two pay periods for the direct deposit benefit to go into effect. The Payroll will process a "pre-note" test before the actual automatic deposit is processed.

Reviewing Your Pay Statement

1. Review your pay statements biweekly (statement details are available online).
2. Notify the Payroll Manager of any errors or concerns.

Resources

- [ADP](#)

Last Updated 09/02/2021 10:07:21 ET



Employment – Recording Time

Purpose

Pantzer Operations utilizes time- and attendance-reporting software to ensure employees record all hours worked, as well as all time off, in an accurate and timely manner.

Standard

General

- For timekeeping purposes, the standard workweek begins at 12:01 a.m. on Sunday and ends the following Saturday at midnight.
- For nonexempt employees:
 - Hours worked should be recorded daily and must reflect all time worked, even if it is more or less than the scheduled hours.
 - The employee reporting the time is solely responsible for the accuracy of the reported hours.
 - Employees must not start work until their scheduled start time, and must not work off the clock for any reason. This includes reading or responding to any form of communication (electronic, in person, and/or third-party) unless the time is preapproved by the manager.
 - Employees may not log into the time-reporting software to record time for other employees. The employee should notify the appropriate manager and/or the HR Director for assistance.
 - Manager approval is required for overtime.
 - The only exception is when an emergency situation occurs that requires unscheduled overtime. In this case, the manager may be informed of the overtime after the fact.
 - Employees may be disciplined for incurring overtime if the time is not preapproved by the manager.
- All employees must record time off using ADP.
- Adjusting, manipulating, or falsifying time records in any way is unacceptable and will result in disciplinary action, up to and including termination.
- Employees should notify the manager and/or the HR Director immediately of any errors, corrections, or questions related to entering their time.

On Call

- Any "on-call" work should be reflected as a minimum of 60 minutes per on-call request; travel time between their home and the property is included with the minimum 60 minutes of on-call work.
- The total on-call hours will be automatically added to the employee's total hours for the day the work was performed.

Procedure

Employee Responsibilities

1. Record hours worked electronically:
 - a. Utilize ADP to record your hours daily.
2. Record "on-call" work:
 - a. Enter "on-call" hours into the system as they occur. Record a minimum of 60 minutes for on-call work; travel time is included with the minimum 60 minutes of on-call work.
 - a. Example #1 - Employee lives onsite; on-call work totaled 15 minutes; enter 60 minutes in ADP
 - b. Example #2 - Employee lives 15 minutes from the property; on-call work totaled 15 minutes; enter 60 minutes in ADP
 - c. Example #3 - Employee lives 30 minutes from the property; on-call work totaled 15 minutes; enter 1 hour, 15 minutes in ADP
3. Record time off:
 - a. Record PTO or floating holiday time in the software as such.
 - b. Record bereavement time, jury/witness duty, and any other time off required by law in the system.
4. Note: The HR Director will process and record any leaves of absence. For questions or assistance, contact the HR Director.

Manager Responsibilities

1. On a daily basis, review and monitor the number of overtime hours worked.
2. At the end of each pay period, verify the totals for each week.

Last Updated 04/24/2025 08:46:23 ET

**6060**

Employment – Overtime Compensation

Purpose

Pantzer Operations complies with all federal and state wage and hour laws with respect to overtime. Pantzer will make every effort to provide employees with as much notice as possible when overtime work is required.

Standard

Nonexempt Employees

- Nonexempt full-time employees are normally scheduled to work eight hours per day.
 - Despite the existence of schedules, there may be circumstances where, due to operating conditions or the absence of other employees, in which an employee may be required to work additional hours. Absent good cause, employees are expected to work when needed.
 - Nonexempt employees who work over 40 hours in a payroll week (Sunday through Saturday), are paid overtime at a rate of time and one-half for hours worked over 40.
- All overtime (including work before and after the scheduled start and end times) must be approved in writing, in advance, by the supervisor.
 - Whether or not approved or authorized, all hours worked by nonexempt employees must be reported, and employees will be paid for all overtime hours worked.
 - When a supervisor initiates urgent or time-sensitive work with a nonexempt employee after normal business hours, and that work results in overtime to complete the urgent or time sensitive request, the overtime will be considered approved.
- Working overtime without permission violates Company policy and may result in disciplinary action up to and including termination.

Last Updated 09/02/2021 12:22:06 ET



Employment –Travel and Training Time

Purpose

Pantzer Operations is committed to accurately compensating nonexempt employees for travel and training time according to federal and state regulations.

Standard

General

- The standards and procedures below apply to nonexempt employees.
- Employees are responsible for accurately capturing their work time in the time-and-attendance system.

Travel

- Determining whether time spent traveling is considered "work" time (and therefore paid) depends on the type, duration, and reason for the travel.
 - Per the Department of Labor, time spent outside of regular working hours as a passenger on an airplane, train, boat, bus, or automobile is not considered compensable work time.
- Local travel:
 - Round-trip travel from home to the employee's regular work site is unpaid. If the employee is required to go to a different work site when leaving home or going home, the portion of the trip in excess of the regular commute is paid.
 - Time spent traveling from one job site to another job site during the workday is paid.
- One-day travel:
 - Employees who travel out of town for a one-day assignment and return home the same day are paid for all travel time, including travel from the employee's home to the airport, bus, or train.
- Overnight travel:
 - Employees will be paid for time spent traveling during their normal working hours on regular working days and also during corresponding hours on nonworking days (such as weekends).
 - Employees will be paid for any time spent performing job duties during otherwise non-compensable travel time; however, such work should be approved by the manager in advance.
- Travel across time zones:
 - Actual time is counted, not the artificial time indicated by the clock changes.

Training

- Employee attendance at lectures, meetings, and training programs is work time and will be paid if management requires and authorizes attendance.
- Training time is unpaid when **all** of the criteria below are met:
 - Attendance is outside of the employee's regular working hours.
 - Attendance is in fact voluntary.
 - The course, lecture, or meeting is not directly related to the employee's job.
 - The employee does not perform any productive work during such attendance.

Procedure

1. Record your work time in ADP.
2. For questions about what is and is not compensable time, contact the Payroll Manager.
3. Review your electronic Time Sheets and pay stubs regularly to ensure proper payment. Notify the Payroll Manager immediately of any errors.

Last Updated 09/02/2021 10:08:08 ET

**6070**

Employment – Safe Harbor for Exempt Employees

Purpose

Pantzer Operations is committed to accurately compensating employees in accordance with all state and federal laws.

Standard

- Exempt employees receive a salary for all hours they may work for Pantzer and are generally expected to put in the amount of time needed to carry out their responsibilities in a timely way.
- The salary is subject to deductions in accordance with state and federal laws. Unless otherwise prohibited, the salary may be reduced for the following reasons:
 - State, federal, or local taxes
 - Employee portions of medical, dental, and life insurance premiums; retirement plan contributions; or other benefits as authorized by the employee
 - Full-day absences for personal reasons other than sickness or disability
 - Full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy, or practice of providing compensation for salary lost due to illness (such as paid sick leave and/or short-term disability)
 - Full-day absences for disciplinary suspensions due to safety and conduct infractions
 - Full-day or partial-day absences for FMLA
 - The first or last week of employment if the employee works less than a full week

Procedure

1. Review pay stubs each pay period for accuracy.
2. Immediately identify and report any errors or improper deductions to the Payroll Manager.

Last Updated 09/02/2021 10:08:15 ET

**6085**

Employment – Updates to Personal Information

Purpose

Pantzer Operations maintains accurate employment records as part of good management, as well as to ensure compliance with various government recordkeeping requirements.

Standard

- To ensure that pay correctly reflects the proper deductions and that benefits include all eligible dependents and beneficiaries, employees MUST notify the HR Director and/or update relevant information within ADP. This includes changes to the following information:
 - Legal name
 - Address
 - Home telephone number
 - Income tax exemptions
 - Social security number
 - Marital status
 - Insurance coverage (dependents)
 - Beneficiaries (for life insurance and 401(k))
 - Work authorization documents

Last Updated 08/13/2020 15:03:38 ET



6086

Employment – Driver's License and Annual DMV Check

Purpose

All employees who drive a vehicle for company business must possess appropriate documentation to operate these vehicles.

Standard

General

- Any employee who drives a vehicle (company-owned, personal, or rental) for Pantzer business, on or off Pantzer property, must always have a current, valid driver's license (for the appropriate class of vehicle).
- This document must be presented at the time of hire or transfer/promotion to the manager and/or the HR Director.
- A motor vehicle check (DMV) is part of the pre-employment background screening and conducted annually for all employees that drive a company vehicle.

Loss, Suspension/Restriction of License, Loss of Insurance

- Any employee who loses his or her license, or who has a suspended/restricted license, must not drive a vehicle for company business, on or off the company's property.
 - Employees are responsible for notifying management and/or the HR Director immediately.
 - The suspension of driving for company business takes immediate effect upon Pantzer's notice to the employee, or as soon as the employee's driver's license has been revoked or suspended, whichever occurs first.
- If the employee's job requires driving, the inability to drive legally may be grounds for termination.
- In some situations, it may be possible to place the employee in a position that does not require driving if such a position is available and the employee is qualified.

Last Updated 03/28/2023 14:52:45 ET

**6090****Employment – Rehires****Purpose**

When an employee voluntarily resigns from Pantzer Operations and is later rehired, certain provisions may apply to the employee's eligibility for benefits.

Standard

- To be eligible to receive credit for prior service, a former employee must have been previously employed for 12 continuous months or more.
- If the period of separation is less than six months:
 - For the purpose of calculating paid time off (PTO), the employee is credited with his or her original hire date and will begin accruing PTO for the length of service that is applicable.
 - If the employee was covered under the group medical insurance plan for the 12 months immediately preceding the date of his or her voluntary termination, the employee's insurance coverage will be reinstated on the first of the month after the new hire date.
 - If the employee was not previously participating in voluntary benefits, he or she will have the same eligibility as a new hire and will receive the enrollment paperwork in the new hire packet.
- If the period of separation is more than six months, the employee is treated as a new hire.

Procedure

1. If you have been away from the company for less than six months, contact the HR Director.

Last Updated 08/13/2020 15:53:03 ET

**6095**

Employment – Verification and References

Purpose

In certain situations, Pantzer Operations will provide employment and pay information, or work-related references, for current and former employees to outside organizations.

Standard

- All requests for references and employment/pay information should be directed to the HR Director or the Payroll Manager. Employees and managers should not provide employment verification data or work-related references.
- The HR Director and the Payroll Manager will only verify dates of employment and the title of the last position held.

Last Updated 08/21/2020 15:57:45 ET



Purpose

Pantzer Operations's benefits program is designed to provide eligible employees and their dependents with competitive health and welfare benefits.

Standard

Employee Benefits Overview

- Pantzer provides a wide range of benefits. Applicable plan documents, which contain eligibility requirements, a complete description of benefits, and answers to benefit questions, are available from the HR Director.
- The terms in the applicable plan documents, if any, supersede any conflicting provisions of this Handbook or any other written or oral communication about such benefits.
- Pantzer reserves the right to modify, eliminate, or otherwise change any and all benefits, in its sole discretion, with or without notice.

Health Benefits

- Pantzer provides health benefits, including but not limited to, medical, dental, vision, and prescription benefits.
 - Employees contribute to their benefits at the current rates established by Pantzer.

Employee Retirement Plan

- Pantzer has an optional 401(k) Retirement Plan. This plan allows employees to save for retirement through convenient payroll deductions.
 - The Plan offers several different investment options which allow for tax deferred savings to compound, while also reducing current income taxes.
 - There is a matching contribution of 25% on the first 6% of the participants' compensation which is deferred as an Elective Deferral. Matching contributions are subject to a vesting schedule.
 - There is also a loan feature available.

Continuing Education

- Pantzer offers tuition reimbursement on classes, certificates and designations which are industry related and approved by management. Pantzer will reimburse up to \$1,000 per calendar year and is subject to the terms set forth for that particular agreement. In most cases, industry related certifications will be reimbursed at the full tuition amount with a requirement to maintain full time employment with Pantzer for at least one year after the completion of the course(s). If tenure is not completed per the arrangement set forth in the agreement, the employee will be required to reimburse Pantzer for monies provided for that coursework.
 - Employee must obtain Regional Manager and Regional Vice President approval prior to registering for the course(s). Employees should discuss any desire to pursue the Continuing Education benefits with their Property Manager and Regional Manager in a timely manner so that budget considerations may be made.
 - Employees must complete the Pantzer Education Assistance Approval Form. A copy of the approved form must be sent to HR.
 - Eligibility applies to all Pantzer employees who work at least 30 hours per week and are actively at work. Employees on leaves of absence or employees that work less than 30 hours per week are not eligible to participate.
 - Upon completion of the approved course(s), the employee must provide proof of completion from an accredited educational institution or industry association, receives a passing grade (if applicable), and proof of payment.
 - Education expense reimbursements will be submitted through Concur, refer to Conduct – Travel and Expenses Reimbursement.

Procedure

1. Contact Human Resources if you have questions about your Pantzer benefits.

Resources

Related Attachments

- Benefits Guide (English)
- 401(k) Enrollment Instructions
- Education Assistance Approval Form

Last Updated 06/22/2026 12:11:47 ET

Attachments

401K Education and Enrollment Instructions

Pantzer Education Assistance Approval Form



Benefits – Eligibility and Waiting Periods

Purpose

Pantzer Operations has eligibility requirements and waiting periods for medical, dental, vision, life insurance, accidental death and dismemberment, and short- and long-term disability coverage.

Standard

Eligibility

- All full-time employees are eligible for coverage under the company's benefits programs.
 - For benefits purposes, full-time employees are defined as employees who, on average, work 30 or more hours per week.
- Part-time employees are not eligible for 401(k) but are eligible to participate in the Employee Assistance Program only.
- If employees move between full- and part-time, their eligibility for certain benefits programs will be impacted.

Waiting Periods

- Medical, dental, vision, life insurance, accidental death and dismemberment, and long-term disability (LTD) coverage become effective after a 14-day wait period.
- The 401 (k) Plan has a 90-day wait period.
- Employees are eligible to participate in the short-term disability plan during the annual open enrollment period.
 - Employee Assistance Program (EAP) – Free, comprehensive counseling service paid for by Pantzer.

Procedure

1. For questions about benefits, contact the HR Director.
2. For enrollment information, please refer to [Benefits – Enrollment Periods](#).

Last Updated 09/02/2021 10:08:35 ET

**Benefits – Enrollment Periods****Purpose**

Pantzer Operations offers a benefits program in a defined plan year and adheres to a variety of benefit requirements and guidelines.

Standard**General**

- Employees can only enroll and/or make changes to their benefits during new hire enrollment, annual open enrollment, or special enrollment due to a qualifying life event.
- Benefits selected during enrollment will remain in effect until the end of the defined plan year and cannot be changed during that period unless there is a qualifying life event.

New Hire Enrollment

- Within 30 days of hire, eligible employees must enroll or waive medical coverage. Benefits are effective after a 14-day wait period.
- If the employee misses this enrollment eligibility period, the employee must wait until open enrollment or until there is a qualifying life event.

Annual Open Enrollment

- The company sponsors open enrollment once per year at the time of the benefits plan renewal.
- During open enrollment, the company provides employees with information to make benefit selections.
- During open enrollment, employees may drop benefit coverage or change from one plan to another. Employees may also make changes to dependent coverage.
- If the employee misses this enrollment eligibility period, the employee must wait until the next open enrollment or until there is a qualifying life event.

Special Enrollment Due to a Qualifying Life Event

- Family and life status changes like getting married, having a baby, or losing health coverage can qualify an employee for a special enrollment period, allowing the employee to enroll in health insurance outside of the annual open enrollment period.
- Within 30 days of a qualifying life event, the employee is responsible for notifying and providing proof by submitting the Qualifying Life Event Form to the HR Director. There are no exceptions to this deadline.

Procedure**To Enroll in the Benefits Program**

1. When eligible to enroll, you will receive notification from the company.
2. Enroll or waive coverage in ADP.
 - a. Designate your beneficiaries as this is required.
 - b. Enroll any eligible dependent for benefits.
3. After receiving a confirmation of the benefits you have selected, review it carefully. Report any errors to the HR Director or the Payroll Manager immediately.

Qualifying Life Event

1. Within 30 days of a family/life change, contact the Employee Service Center within ADP.

Last Updated 09/02/2021 10:08:46 ET



6135

Benefits – Employee Referral Program (ERP)

Purpose

Pantzer Operations encourages employees to refer qualified candidates for open positions and be eligible for monetary incentive through the Employee Referral Program (ERP).

Standard

- All employees are eligible to participate in the ERP. Exceptions include:
 - All members of the HR Department
 - Regional Managers and above
- For an employee to be considered eligible for a referral award, the applicant must identify the employee as the referral source on the job application.
- If the candidate is hired and completes 30 days of service, the referring employee is eligible to receive a monetary award. The referring employee receives half of the award amount and the remaining half following the new hire's completion of six months of service.
- The referring employee must be actively employed with Pantzer at the time of the ERP payment.
- Award amounts vary.
- ERP payments are considered supplemental wages and are taxable as defined by the IRS.

Procedure

To Make a Referral

1. Complete the Employee Referral Form and submit to the HR Director and the Payroll Manager.
2. Contact the HR Director or Payroll Manager for questions or payment status.

Resources

- 2026 Employee Referral Form

Last Updated 06/03/2026 11:36:18 ET

Attachments

2026 Employee Referral Form

**Benefits – Housing Discounts****Purpose**

Pantzer Operations offers full- and part-time employees an apartment rental discount.

Standard

- For further information, please see the Employee Housing Discounts policy found within the Management and Operations Manual.
- Property Manager must complete a PAF for all employee leases for any changes, including move-in, move-out, transfers, and rent changes on or before the effective date of the changes

Last Updated 08/15/2024 15:55:17 ET

**Purpose**

Pantzer Operations observes several holidays and provides time off with pay for eligible employees.

Standard

- Pantzer observes the following paid holidays for all employees unless otherwise indicated:
 - New Year's Day
 - Martin Luther King, Jr. (MLK) Day
 - Memorial Day
 - Independence Day
 - Labor Day
 - Thanksgiving Day
 - Day after Thanksgiving (Corporate only)
 - Christmas Day
 - President's Day (Corporate only)
 - One Floating Holiday (Corporate only).
 - Two Floating Holidays (On-Site Employees only) prorated to one floating holiday if hired after June 30. On-site employees hired after November 30 will not receive floating holidays until the following calendar year
- At the beginning of each year, Pantzer will publish and share with employees the dates that holidays will be observed.
 - Generally, holidays that occur on a Saturday will be observed on the preceding Friday, and holidays that occur on a Sunday will be observed on the following Monday.
 - Pantzer reserves the right to adjust the day the holiday is observed when the holiday falls on a weekend.
- Regular, full-time, active employees are eligible for paid holidays from their date of hire.
- Part-time employees are eligible for holiday pay if they are normally scheduled to work on such days and shall be paid on a pro-rated basis based on their work hours.
- Holiday pay is not considered hours worked in the computation of overtime unless the employee works on the company-observed holiday.
- Holidays that occur during scheduled and approved time off are counted as paid holidays and will not be counted against other time off.
- In order to provide adequate coverage, some employees may be asked to work on a holiday.
 - Nonexempt employees who are requested to work during a paid holiday will receive holiday pay plus regular pay, or whatever is required by state law.
 - Exempt employees who are requested to work during a paid holiday will be given an alternate day off during the same pay period.
- Employees who wish to observe other religious holidays may use their paid time off, or may be granted such time off without pay, at the Company's discretion.
- Company-recognized holidays are subject to change.

Last Updated 01/02/2024 13:32:08 ET



Time Off – Paid Time Off (PTO)

Purpose

Pantzer Operations provides a paid time off (PTO) bank to give eligible employees the flexibility needed to balance professional and personal schedules. Employees should use accrued PTO for vacation, sick leave, personal leave, family illness, or any approved time off. Pantzer complies with all state and local laws and regulations with respect to time off.

Standard

General

- PTO is granted to eligible full- and part-time employees.
- PTO may be taken in one-hour increments.
- Retaliation against employees for exercising rights under state and local paid sick leave laws is strictly prohibited. Any employee who believes that he or she has been subjected to retaliation for requesting or taking PTO covered by state or local paid sick leave laws should notify the HR Director immediately.
- Employees will be provided with notice describing their rights where required by law. Please also refer to state notices for more information.
- PTO is not included in over-time calculations. Upon termination of employment, employees will be paid for accrued but unused PTO time earned through the last full pay period worked, and any unused floating holidays. If an employee has a negative PTO balance, they are responsible for paying back the balance to the Company and, to the extent permitted by law, the Company may deduct the balance from the employee's final paycheck.

Accrual

- PTO accruals begin to credit eligible employees upon their hire date and will adjust appropriately per the below chart. (PTO accruals reset each year in January with an allowed 56 max carry over hours into a new year.)

Full-time (FT) Years of Service	Annual PTO Allotment	
FT Years 0 through 4	17 days	136 hours
FT 5 to 12 years	22 days	176 hours
FT over 13 years +	27 days	216 hours

Part-Time Employee PTO

- **Part-time employees will accrue PTO at the rate of one hour of PTO for every 30 hours worked up to a maximum of 56 hours of PTO in a calendar year.**

Carryover

- Every effort should be made to use earned PTO time during the calendar year. In the event that accrued PTO time is not used by the end of the year (December 31st), employees may carry over up to 56 hours of unused time into the next calendar year.
- PTO in excess of 56 hours may not be carried over and will not be paid out in lieu of carry-over or taking time off, unless prohibited by applicable law.

Reasons for Time Off

- In addition to the reasons stated above, PTO may also be utilized for the following:
 - Time needed for diagnosis, care, or treatment of, or recovery from an employee's mental or physical illness, injury, or other adverse health condition or for preventative care for the employee;
 - Time needed for the employee to aid or care for a family member for any of the reasons listed above;
 - Absence necessary due to an employee or a member of the employee's family being a victim of domestic or sexual violence, if the leave is to allow the employee or family member an opportunity to receive medical attention due to an injury (physical or psychological) resulting from the violence, obtain victim services, psychological or other counseling, relocate, obtain legal services, or participate in a legal proceeding related to the violence;
 - Time during which the employee is not able to work because, due to a public health emergency and by order of a public health authority, their normal work place or his or her child's school childcare provider has closed; or
 - Time needed to attend a school-related conference, meeting, or event regarding the employees' child, or to attend a school-related meeting regarding the child's health.

- If illness or injury requires to an employee to be absent from work for more than seven consecutive days, the employee may be eligible for state short-term disability benefits that pay a portion of compensation while out on a disability-related leave of absence.

Procedure

Requesting PTO – Employee Responsibilities

1. When requesting PTO in ADP, provide as much notice as possible:
 - a. For PTO request of one day, please provide at least 48 hours advance notice.
 - b. For PTO requests of five consecutive days or more, please provide at least two weeks' advance notice.
 - c. If the time off requested is unforeseeable (such as the need for sick time), contact your manager by telephone before the beginning of the scheduled shift. If you are incapacitated, a family member must contact your manager as soon as possible.
 - d. For time off covered under a paid sick leave law of three or more consecutive days, medical documentation may be required.
 - Notify your supervisor if more than seven consecutive days of leave is taken due to injury or illness.

Scheduling PTO – Manager Responsibilities

1. Upon notification of the employee's request:
 - a. Consider business and scheduling needs.
 - b. Approve or deny the request within ADP.

Last Updated 03/27/2024 14:55:07 ET



Time Off – Family and Medical Leave Act (FMLA)

Purpose

Pantzer Operations complies with the federal Family and Medical Leave Act (FMLA), which requires certain employers to provide up to 12 weeks of unpaid, job-protected leave per year to eligible employees for qualified medical and family-related reasons. Pantzer abides by all state laws regarding employee leaves.

Standard

Reasons for Taking Leave

- In compliance with the federal Family and Medical Leave Act, eligible employees can take time off for the following reasons:
 - To care for the employee's newborn child or for the adoption or foster placement of a child (within 12-months of the birth, adoption or placement);
 - To provide necessary care for the serious health condition of the employee's spouse, parent, or a minor or disabled child,
 - For the employee's own serious health condition, including pregnancy and on-the-job illnesses or injuries, that makes the employee unable to perform the essential functions of the job.
 - Due to any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member who is a member of a regular component of the armed Forces on active duty or has been notified of an impending call or order to active duty status for deployment to any foreign country in the regular or reserve components of the Armed Forces, including the National Guard or Reserves.
- A serious health condition is defined as an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents employees from performing their job, or prevents the qualified family member from participating in school or other daily activities.
 - Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition.
 - Other conditions may meet the definition of continuing treatment. Reach out to the HR Director for more information.
- Qualifying exigencies may include attending certain military events, arranging for alternative childcare, arranging for alternative parental care for the parent of a covered servicemember, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

Eligibility

- To qualify for FMLA, employees must meet the following requirements:
 - Work at a location where Pantzer has at least 50 employees within 75 miles.
 - Have been employed at the Company for at least 12-months.
 - Have worked at least 1,250 hours during the 12-month period preceding the leave.
- If employees do not meet the eligibility requirements listed above, they may request an unpaid leave of absence if such leave does not present an operational hardship on the Company.
 - In addition, if FMLA has been exhausted, an employee may be granted an additional unpaid medical leave as a reasonable accommodation, in the sole discretion of the Company.
 - Since some states grant additional leave, employees should contact the HR Director for further information.
- If two employees who are spouses both work for Pantzer Operations, they are limited to taking a combined 12 weeks of unpaid leave for any of the following instances:
 - To bond with their child after birth or placement for adoption or foster care.
 - To care for a parent who has a serious health condition.
 - To care for a covered servicemember (either the spouse or a son, daughter, or parent of one of the employees) with a serious injury or illness.
 - Spouses are entitled to a total of 26 workweeks during a single 12-month to care for a covered servicemember.

Form of Leave

- Leave may be taken in one consecutive period of up to 12 weeks or intermittently (in separate blocks of time) or on a reduced schedule (fewer hours in a day or days in a week), when medically necessary.

- However, intermittent or reduced schedule leave to care for a newborn or newly-adopted or foster-placed child may only be taken if granted at the discretion of the Company.
- Intermittent or reduced schedule leave (including medical treatment causing such leave) must be scheduled so as not to disrupt the Company's operations to the extent possible.
- Leave to care for a servicemember shall only be available during a single 12-month period and, when combined with other FMLA-qualifying leave, may not exceed 26 weeks during the single 12-month period.
- The single 12-month period begins on the first day an employee takes leave to care for the injured servicemember. Contact the HR Director for more information.

Payment During Leave

- While FMLA is unpaid, employees may be entitled to receive payment under certain circumstances.
 - Full-time employees that have been employed for a minimum of one year, are entitled to up to four weeks paid leave provided the Company has received all required paperwork, at 100% of base salary, less applicable withholdings and deductions.
 - This leave is only applicable to leave needed for an employee's own serious health condition. Pay related to FMLA leave taken for pregnancy, pregnancy related conditions, or for bonding with a child is covered in the Time Off – Pregnancy and Parental Leave.
- Employees on an extended continuous medical leave, may be entitled to short-term disability benefits, disability benefits under applicable state law, paid family leave under applicable state and local law, or workers' compensation benefits.
 - These benefits will run concurrently with FMLA to the extent permitted by applicable law.
 - Employees not receiving such benefits must use all paid time off (PTO) concurrent with any unpaid leave of absence, including FMLA absences.
 - Use of PTO will not serve to extend the FMLA period, but rather to compensate employees during their leave.

Maintenance of Benefits

- During approved FMLA leave, the Company will maintain eligible employees' health benefits as if the employees continue to be actively employed.
 - If paid leave (e.g., PTO, pregnancy and/or parental leave) is used concurrently with FMLA leave, as is required when it is available, the Company will deduct the employee's portion of the health plan premium as a regular payroll deduction.
- If the leave is unpaid, the employee must pay their portion of the premium by providing a check to the Company. Employees should contact the HR Director to check state and local laws that provide different guidance or make arrangements for the payment of premiums.
 - The health care coverage will cease if the employee's premium payment is more than 30 days late.
 - If an employee's premium payment is more than 15 days late, the Company will send the employee a letter to this effect. If payment is not received within 15 days after the date of this letter, the employee's coverage will cease.
 - If the employee elects not to return to work for at least 30 calendar days at the end of the leave period, they will be required, in most cases, to reimburse the Company for the cost of the health benefit premiums paid on their behalf for maintaining coverage during leave, unless the employee cannot return to work because of a serious health condition or other circumstances beyond their control.
- 401(k) and/or Flexible Spending contributions (if applicable) will cease once employees begin unpaid status. Upon return to work, contributions will be reinstated. Flexible Spending contributions that were not deducted during FMLA leave will be deducted upon return to work.

Certification of Serious Health Conditions

- Employees may be asked to provide the Company with a medical certification from a health care provider when requesting FMLA.
 - Medical Certification Forms are available from the HR Director. The Company reserves the right to require employees or family members, to obtain second or third medical opinions at its expense, in order to determine the necessity of leave.
 - Failure to provide the certification required by the Company in a timely manner may result in the delay or denial of leave and/or denial of benefits, or in some circumstances, denial of reinstatement due to unauthorized absence.
- Upon return to work following leave due to an employee's serious health condition, a medical release must be submitted stating that the essential functions of the job can be performed with or without reasonable accommodation.

Reinstatement

- After up to 12 weeks of FMLA leave (in some cases, longer depending upon state law), the Company will reinstate employees with the same or an equivalent position, with no loss in salary, benefits, or other terms and conditions of employment.
 - Employees are permitted to remain on leave beyond 12 weeks, they may be reinstated to a position, which may or may not be equivalent to their prior position to the extent permitted under applicable law.
 - Employees subjected to termination of employment had they not taken leave, are not entitled to reinstatement.

- Employees should contact the HR Director for further information about entitlement to FMLA leave and the required procedures.

Procedure

Requesting FMLA Leave

1. Submit a completed Request for Leave of Absence Form to the HR Director as far in advance of the anticipated leave date as possible.
 - a. Provide a 30-day advance notice when the need for leave is foreseeable.
 - b. When a 30-day notice is not possible, provide notice as soon as possible, and comply with the company's call-in procedures.
2. Provide:
 - a. Anticipated timing and duration of the leave
 - b. Sufficient information that shows the leave qualifies for FMLA, such as:
 - Your inability to perform your job function
 - A family member's inability to perform daily activities
 - A need for hospitalization or continuing healthcare treatment
 - A need for military family leave
3. Next, the HR Director will:
 - a. Inform you as to whether your leave will be designated as FMLA-protected, and indicate the amount of leave counted against your leave entitlement.
 - b. If the HR Director determines that your leave is not FMLA-protected, a member of the HR Director will notify you.

While on Leave

1. Inform the HR Director and/or your manager of any changes in your contact information, telephone numbers, and/or address that occur during a leave.
2. Notify the HR Director of the status of your anticipated return-to-work date.
 - a. If there is a change in your return-to-work date, obtain the necessary certification giving the reason for the change.

Return to Work

1. If you have taken FMLA leave for your own serious health condition, provide the HR Director with your healthcare provider documentation before you return to work.
2. If you require an extension of your leave, contact the HR Director.

Resources

Related Attachment

- Request for Leave of Absence Form

Last Updated 02/05/2026 15:22:00 ET

Attachments

Leave of Absence request form 2026



6165

Time Off – Pregnancy and Parental Leave

Purpose

Pantzer Operations recognizes that welcoming a child is a life-changing event, and encourages all eligible employees to take full advantage of pregnancy and/or parental leave. The Company offers new or expectant mothers pregnancy leave to recuperate from childbirth and other medical conditions related to their pregnancy as well as offering parental leave to allow parents to bond with their child.

Standard

Eligibility

- Employees are eligible if they have been employed with the Company for a minimum of one year and worked 1,250 hours during the twelve months preceding the leave.
- Employees who have not been employed for one year will be able to apply for an unpaid leave of absence, as well as any federal and/or state-provided benefits.
 - In addition, these employees will be able to use accrued but unused paid time off.

General Provisions

- Eligible employees will receive up to four weeks of paid leave at 100% of their salary for each leave, less applicable withholdings and deductions.
 - Based on the above, employees who are eligible for both Pregnancy and Parental Leave may receive up to eight weeks of paid leave.
- Employees may also use any accrued, unused paid time off in addition to the paid Pregnancy and/or Parental Leave. This may result in a maximum of 12 weeks of paid leave for some employees.
 - Paid leave must be taken consecutively and will run concurrently with the FMLA and other unpaid leave required by state law, to the extent permitted by applicable law.
 - Employees may be eligible for additional paid leave under state or local law.
 - However, employees will not receive more than 100% of their base salary for any period of paid leave.
- Refer to the notification requirements within Time Off – Family and Medical Leave Act (FMLA) when requesting leave.
- Contact the HR Director with any questions about the benefits under this policy or applicable law.

Procedure

1. Submit a completed Parental Leave Request Form to the HR Director as far in advance of the anticipated leave date as possible.

Resources

Related Attachment

- *Parental Leave Request Form*

Last Updated 09/02/2021 10:53:05 ET

Attachments

Parental Leave Request Form 4-2019



Time Off – Military Leave

Purpose

Pantzer Operations appreciates, respects, and supports employees who serve in the uniformed services, and complies with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and any applicable federal and state laws. As such, Pantzer will not discharge or deny an individual of employment, reemployment, promotion, or any benefit due to an individual's membership, application for membership, performance of voluntary or involuntary service, application for service, or obligation to perform service in a uniformed service.

Standard

- USERRA applies to persons who perform duty, voluntarily or involuntarily, in the "uniformed services," which include the Army, Navy, Marine Corps, Air Force, Coast Guard, and Public Health Service commissioned corps, as well as the reserve components of each of these services.
- Employees called into active military service are eligible for an unpaid military leave of absence.
- Employees must provide management with as much notice as possible of military service orders unless it is impossible or unreasonable to do so. In the event the employee cannot provide notice, a family member should notify Pantzer immediately.
- Employees who are required to attend Reserves or National Guard duty can apply for an unpaid temporary military leave of absence.
 - Including travel, the time off cannot exceed the number of days allowed by law.
 - The employee should provide Pantzer with as much notice as possible in order to ensure smooth business operations.
- Paid time off (PTO) may be used during the leave if desired by the employee; otherwise, the leave will be unpaid. PTO leave does not accrue while the employee is away from work.
- For military service less than 31 days, Pantzer will continue to provide health care coverage. For military service beyond 31 days, employees should contact the HR Director for benefit details.
- Employees may accumulate a total absence of five years for military service and retain reemployment rights, accruing seniority and benefits per federal and state laws.
- Following the completion of military service, failure to report to work within the designated time frame will be considered a resignation.
- Employees should contact the HR Director if they have questions or for more detailed information about military leave.

Procedure

Requesting Military/Reserve Duty Leave

1. Submit a Request for Leave of Absence Form (along with copies of relevant military orders or instructions) to your manager as soon as practical and within a reasonable time frame of receiving these documents.

Resources

Related Attachment

- Leave of Absence Request Form

Last Updated 09/02/2021 13:31:56 ET

Attachments

Leave of Absence Request Form 2021

**Time Off – Bereavement****Purpose**

Pantzer Operations provides full- and part-time employees paid time off for the death of a close relative. Bereavement time off is in addition to other time-off programs.

Standard

- At the discretion of the Company, employees may take up to three days off with pay upon the death of a member of the immediate family or household.
 - For the purpose of this policy, "immediate family" is defined as: spouse (including domestic partner or civil union status partner), child, stepchild, parent or stepparent, sister, brother, step sister, step brother, mother-in-law, father-in-law, brother-in-law, sister-in-law, grandparent, grandchild, and an individual who raised or was raised by the employee.
- For the death of a relative not in an employee's immediate family, employees may take one day of paid bereavement leave.
 - Employees have the option to use paid time off if more time off is needed.
- Any time off must be approved by an employee's immediate supervisor and entered into ADP.

Last Updated 11/10/2023 15:59:11 ET



Time Off – Jury and Witness Duty

Purpose

Pantzer Operations supports employees in their civic duty to serve on a jury or as a witness.

Standard

- Employees will be paid the difference between the jury duty pay and regular pay for a reasonable period as determined by the Company, consistent with applicable law.
 - The Company will review each case individually in order to determine a reasonable amount of time that will be paid, if any, for jury duty.
- Employees will not be penalized, terminated, or disciplined based on time served for jury duty.

Procedure

Witness or Jury Duty

1. If you receive a notice to report for jury or witness duty, immediately notify your manager and present the jury/witness summons.
2. If you are not required to serve as a juror on a scheduled workday, or you are released prior to the end of the regular work day, you must return to work.

Last Updated 08/04/2020 10:57:29 ET

**Purpose**

Pantzer Operations encourages employees to vote in all national, state, and local elections.

Standard

- Pantzer encourages employees to vote outside of working hours.
- If suitable time for voting is not available before or after normal work hours, two hours with pay will be provided to the employee as required by state law.

Procedure

1. If possible, try to vote before or after the workday.
2. If you need to use work time to vote, make arrangements in advance with your manager.

Last Updated 07/09/2020 11:28:02 ET

**6200****Time Off – Nursing Break****Purpose**

Pantzer Operations complies with the Patient Protection and Affordable Care Act ("PPACA") and the amendment to the Fair Labor Standards Act with respect to nursing mothers.

Standard

- The Company shall provide reasonable unpaid break time or permit employees to use paid break time or meal time each day to allow employees to express breast milk for a nursing child.
- Pantzer will provide a private and functional location for an employee to take a nursing break.
 - The private and functional location may be the employee's private office, if applicable, and cannot be a designated bathroom.
- An employee may take nursing breaks, as necessary, up to three years after the birth of the child.

Procedure

1. Advise management or Regional Vice President if you need a private area for a nursing break.

Last Updated 09/02/2021 10:10:55 ET



Purpose

Pantzer Operations is committed to a positive, productive, and professional work environment.

Standard

- All employees and individuals doing business with Pantzer Operations play a key role in creating and maintaining a positive and professional workplace through their words, actions, and behaviors.
 - If employees become aware of behavior that is either questionable or in direct violation of Company policies, they individual should report the behavior to the supervisor or the HR Director.
- The following are examples of some, but not all, behaviors that are unacceptable and subject to disciplinary actions:
 - Dishonesty, theft, or embezzlement, or acting as an accessory to theft or embezzlement (including but not limited to theft of information or time), unauthorized removal or possession of property, or conviction of a crime.
 - Unprofessional conduct, including but not limited to vulgarity or offensiveness in mannerism or speech, and sexual activity on Company time or premises. Use of foul and/or abusive language or otherwise abusive, discourteous or inconsiderate treatment of others.
 - Misrepresentation, either verbal or written, or falsification or careless completion of Company documents, including but not limited to employment applications, work authorization and expense and time records (including those of others).
 - Making untruthful statements about the Company or its employees, competitors or tenants.
 - Harassment or discrimination against others, including but not limited to co-workers, subordinates, suppliers, or tenants.
 - Use, possession, manufacture, distribution, purchase, or sale of, or impairment caused by, controlled dangerous substances, drugs or alcohol on Company time or in Company facilities.
 - Possession, use, or distribution of dangerous weapons, including but not limited to knives, guns, explosives, or any other devices that jeopardize the safety or security of individuals and/or property on Company premises. Intimidating or dangerous conduct of any kind, including but not limited to threats (express, implied, or in jest), horseplay, fighting or attempting to inflict bodily injury on another person or damage to property.
 - Gambling. Illegal or illicit gambling during work hours on Company premises is strictly prohibited. The use of legal gaming apps, websites and other mediums during non-work time, that is consistent with applicable state and local laws, is permitted pursuant to and in accordance with the Company's Proper Use of Company Equipment and Services policy.
 - Unauthorized or improper personal use or abuse, removal, sabotage, loss of, or damage to, property of the Company (including but not limited to electronic or voice mail, computers telephones, postage, copy and facsimile machines), its tenants, or co-workers.
 - Unauthorized access, divulgence, or use of Company, employee or tenant information or record, and disclosing tenant or employee lists, telephone numbers, or other confidential or proprietary information (not to include the disclosure or discussion of wages, hours, and other conditions of employment as protected by the National Labor Relations Act).
 - Involvement in or knowledge of situations involving conflicts of interest or the appearance of impropriety, including but not limited to questionable interactions with or relationships with tenants, vendors, or co-workers.
 - Insubordination, including but not limited to refusal to perform work assigned, as well as disrespectful conduct toward superiors, co-workers, suppliers or tenants, unless he/she has a concern of illegal or dishonest fraudulent activity or a safety issue.
 - Engaging in behavior that creates discord and lack of harmony, including but not limited to spreading malicious gossip and/or rumors, interfering with other employees on the job, or restricting work output or encouraging others to do so.
 - Incompetence, inefficient or careless performance of duties, failure to maintain proper work or safety standards, or other poor performance or poor judgment, as determined by the Company.
 - Performing tasks other than Company work during working hours.
 - Excessive absenteeism or lateness, or failure to report absences from work or provide documentation in a timely manner or in accordance with Company requirements.
 - Leaving assigned work area or premises during working hours or leaving early without management permission. Loitering, loafing, taking unauthorized or overextending authorized breaks, sleeping or being inattentive to duties

during working hours.

- Failure to project a professional image, including but not limited to failing to maintain proper hygiene, failing to wear appropriate attire and engaging in unprofessional conduct, including but not limited to with or in front of tenants, or conduct that could damage the Company's reputation.
- Audio taping a supervisor or co-worker without their consent or management authorization (not to include activity protected by the National Labor Relations Act).
- Failure to treat co-workers and tenants with the utmost of courtesy and respect at all times.
- Failure to report immediately all injuries or accidents to the employee's supervisor.
- A violation of any law of other Company policy, procedure, or rule.
- Unauthorized entry of occupied or unoccupied apartments.
- Violation of Fair Housing Laws or discrimination when leasing apartments.
- Failure to comply with these standards or to report violations, may, at the sole discretion of the Company, result in disciplinary action up to and including termination of employment.
- NOTHING HEREIN SHALL MODIFY THE AT-WILL NATURE OF EMPLOYMENT AT THE COMPANY.

Last Updated 09/02/2021 10:56:26 ET



Conduct – Whistleblower Protection

Purpose

Pantzer Operations provides an avenue for all employees (full-time, part-time, temporary, and contract) to report any illegal or fraudulent business activities occurring in the workplace. Pantzer is also committed to protecting any employee who reports such activities (a "whistleblower") from retaliation.

Standard

- The Company encourages employees to report any conduct observed at work that may be a violation of a law, rule, or regulation or is fraudulent, criminal, or unethical in nature. Employees should report such conduct to one or more of the following individuals:
 - Property Manager or Immediate Supervisor
 - Senior Vice President of Operations
 - The HR Director
- Managers will not take any retaliatory action against employees for doing any of the following:
 - Disclosing or threatening to disclose to a supervisor or to a public body an activity, policy, or practice of the Company or another Company with whom there is a business relationship, that may be in violation of the law or a rule or regulation issued under the law.
 - Providing information to or testifying before any public body conducting an investigation, hearing, or inquiry into any violation of law or a rule or regulation issued under the law by the Company or another Company, with whom there is a business relationship.
 - Objecting to or refusing to participate in any activity, policy or practice which:
 - May be in violation of a law, or a rule or regulation issued under the law
 - Is fraudulent or criminal
 - Is incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment
- Any questions regarding this policy should be addressed to the HR Director.

Procedure

1. If you suspect a situation that you believe warrants reporting under this policy, report it to the Property Manager, Senior Vice President, or the HR Director immediately.
2. For any employment-related concerns other than those relating to this policy, submit reports through your normal channels such as your supervisor or the HR Director.

Last Updated 09/02/2021 10:56:59 ET

**Purpose**

To ensure smooth business operations and outstanding customer service, Pantzer Operations expects employees to report to work on time and be ready to work on their scheduled workday. Punctual attendance is an essential function of the work.

Standard

- Arriving late, leaving early and frequent unscheduled absences are costly, disruptive, and place an undue burden on coworkers and management.
- Pantzer understands there are instances when tardiness and absences cannot be prevented. Employees should keep these instances to a minimum, and they should notify their manager immediately prior to their scheduled start time.
 - Employees must notify the supervisor as soon as possible so that arrangements can be made to ensure coverage.
 - Absent an emergency that would prevent the employee from doing so, such notification should occur at least one hour prior to the start time. If the supervisor cannot be located, employees must contact the supervisor on duty.
- Employees should contact the HR Director regarding any extended (more than three days) absence.
- The Company may require a physician's certification verifying the need for absence and the anticipated length of absence.
 - Contact the HR Director if the duration of the leave of absence changes.
- Excessive tardiness or absences will result in disciplinary action, up to and including termination.

Last Updated 09/02/2021 10:11:12 ET



6220

Conduct – Dress (On-Site Employees)

Purpose

As representatives of Pantzer Operations, employees are expected to maintain a professional appearance at all times while at work.

Standard

- Employees must dress in attire that is appropriate for a professional business office at all times. Some employees may be required to meet special dress, grooming, and hygiene standards, such as wearing uniforms or protective clothing, depending on the nature of their job.
- Employees must wear the Pantzer name tag or ID badge at all times, either on a jacket or shirt lapel, or lanyard. This is a key part of Pantzer's standard for professionalism, as well as safety and security.
- It is the manager's responsibility to ensure that all staff members maintain the proper attire.
- Employees who are not properly dressed or groomed may be asked to return home to change; this time is unpaid. Additionally, disciplinary action may be taken.
- Pantzer will consider modifications to this policy when requested as an accommodation for an employee's sincerely held religious belief and/or national origin. Employees should contact the HR Director for any request for accommodation.
- Pantzer considers the following attire unacceptable for all employees:
 - Any clothing that exposes the body: revealing tops or bottoms, tight-fitting clothing, "see-through" clothing
 - Halter tops, tank tops, midriff tops, tee shirts, muscle shirts, gym or yoga attire, crop tops, camouflage shirts
 - Denim jeans (unless authorized), overalls, shorts (unless company-issued uniform shorts), camouflage pants, pants worn below the waist or hip, stretch pants, leggings/jeggings
 - Shirts with business advertising (excluding the Pantzer logo), offensive pictures, or obscene language
 - Spaghetti-strap sundresses, halter dresses, maxi dresses, and miniskirts
 - Fleece, sweatshirts, and sweatpants of any style or color
 - Flip flops, slippers, Croc-like shoes, stilettos with four-inch heels or taller
 - Baseball caps or hats (unless part of the Pantzer uniform)
- For questions, complaints, or concerns about dress and grooming, employees should contact the HR Director.

Procedure

General Guidelines for all Employees

1. Ensure your appearance is not overly casual or dramatic; avoid extremes in dress and grooming.
2. Make sure that your clothing is clean, pressed, and fits appropriately.
3. Shoes should be in good condition, polished, and clean. Heel height should be appropriate for walking, climbing stairs, touring the property, etc.
4. If you wear jewelry, please make sure it is not distracting or disruptive in terms of style and quantity. Body piercings (other than ear piercing) should not be visible.
5. Tattoos must be discreetly displayed or covered completely at work at all times. Tattoos must not be in violation of any other company policy.
6. Groom yourself in a professional manner consistent with good hygiene, safety, and a clean appearance.
7. Hair must be neatly groomed and a natural-looking color. Keep facial hair neat and trimmed.
8. Fingernails must be neat, clean, and of acceptable length. Fingernails should be manicured, with no chipped polish.
9. Keep accessories and makeup professional.
10. Limit personal fragrance as others may be highly allergic to it.

Service Team

1. Belts should be black or brown with a conservative buckle.
2. Watches and wedding bands may be worn.
3. If hats are worn, they should identify Pantzer, not advertise a product or other company.
4. Wear freshly laundered uniforms. Ensure they are in good repair and free of stains and tears, with no missing buttons. Shirts must be tucked in at all times.
5. Steel-toed shoes are recommended, but rubber-soled shoes and sneakers are acceptable. Wear socks at all times. Sandals are not permitted.

Last Updated 08/11/2020 14:54:12 ET

**6230**

Conduct – Personal Calls and Visits

Purpose

To avoid disruption and work delays, Pantzer Operations expects employees to limit personal calls and visits, and to moderate the use of their cell phones and other communication devices (tablets, iPads, etc.) during working time.

Standard

- Personal calls, communication device usage, and personal visits should be limited to lunch or break time, and they should take place at a location that will not disturb coworkers. Emergencies are an exception.
- Employees must keep their cell phones/devices on silent mode while on company premises, including while at workstations and in offices.
- Although Pantzer supports the use of cell phones by some employees who must conduct business while out of the office, Pantzer strictly prohibits cellular usage, including texting, while driving a motor vehicle. Refer to [Safety – Operating Vehicles](#) for additional information.
 - Except for emergencies, employees may conduct a telephone call from a vehicle only if they have pulled the vehicle over to a safe place or they use a hands-free device while operating the vehicle, if allowed by law.

Last Updated 09/02/2021 10:11:24 ET

**6235**

Conduct – Personal and Family Relationships

Purpose

Pantzer Operations wants to ensure that corporate practices (including employee hiring, promotion, and transfer) do not create situations such as a conflict of interest or favoritism.

Standard

Employee Relationships

- While it is not the Company's intent to unreasonably pry into employees' personal lives, many problems result when employees are involved in personal relationships (including but not limited to romantic and family relationships) with other employees or vendors.
 - Such problems can include, but are not limited to, conflicts of interest and the appearance of favoritism and/or coercion.
- In general, there shall be not direct reporting relationship between any two individuals with a personal relationship as defined above.
- Employees are required to report all personal relationships to the HR Director so that the Company can assess whether such relationship necessitates an operational change (e.g., transfer to other department) or other business action to avoid potential issues and risk.
- Failure to do so may be grounds for termination of employment.

Last Updated 08/06/2020 12:49:33 ET

**6240****Conduct – Solicitation and
Distribution****Purpose**

Pantzer Operations is committed to ensuring that all employees work in an environment free from unnecessary distractions and work interference.

Standard

- Solicitation by an employee of another employee and/or resident is not permitted while either individual is on work time. This is to minimize interruptions and distractions and to protect employees, customers, and visitors.
 - "Work time" is defined as the time an employee is performing, or should be performing, work tasks. Meal and rest breaks are not considered work time.
- Employees are not permitted to distribute any materials that would personally profit the employee, such as written materials, handbills, advertising materials, or any other type of literature on work time and in work areas. Work areas do not include break rooms, parking lots, or common areas shared by employees during nonworking time.
- Non-employees are not permitted to trespass, solicit, or distribute materials on Pantzer property at any time.

Last Updated 09/02/2021 10:11:41 ET

**Conduct – Bulletin Boards****Purpose**

Pantzer Operations utilizes bulletin boards to post important notices, including required government postings and other items of general interest.

Standard

- Bulletin boards are typically located in common areas such as break rooms or near rest areas. Some bulletin boards may be virtual in nature and accessible via the company intranet.
- Bulletin boards are intended for required government postings, as well as official, approved company notices and announcements. Employees should not post or remove these items from the bulletin board.

Last Updated 07/09/2020 12:39:52 ET



Purpose

Pantzer has established guidelines to help employees understand their responsibilities with respect to personal social media use as it relates to the company and our customers, partners, and employees. These guidelines serve to safeguard Pantzer's business interests and reputation while protecting employees from any liability resulting from violations of Pantzer's policies and/or applicable laws.

Standard

General Guidelines

- The Company recognizes that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, LinkedIn, Twitter, Instagram, Snapchat, Pinterest, Tumblr, blogs, and wikis.
 - Employees use of social media can pose risks to the Company's confidential and proprietary information, can expose the Company to discrimination and harassment claims, and can jeopardize the Company's compliance with business rules and laws.
 - Social media can also jeopardize employees personally by exposing their confidential information and exposing them to discrimination and harassment claims.
- All of the Company's other policies that might apply to social media use and online activities remain in full force and effect. In particular, the following policies should always be adhered to:
 - Nondiscrimination/Anti-Harassment and Retaliation
 - Employment – Verification and References
 - Conduct – Behavior
 - Conduct – Use of Company Property
 - Confidentiality
- Before engaging in social media use and online activities, consider some of the risks and rewards that are involved.

Personal Use of Social Media

- The Company understands that many employees operate personal social media accounts.
- Employees must adhere to the following rules when engaged in personal social media use and online activities:
 - **During the Workday** – The use of internal, company-hosted social media accounts is for business use only. Employees are permitted to engage in personal social media use and online activities during nonworking time including lunch breaks, scheduled and approved work breaks, and before and after normal business hours.
 - **Keep Personal Social Media Use Personal**
 - The lines between personal and for-business social media use can easily become blurred. Not having a clear distinction between the two poses greater legal risks to both the employees and the Company.
 - When engaged in personal social media use and online activities, employees must be sure that they are not and do not appear to be representing the Company or making statements on behalf of the Company.
 - Employees must not use company-provided email addresses when registering personal social media accounts.
 - An employee should always disclose that he or she is an employee of the Company when promoting our facilities and services on social media platforms.
 - If an employee's personal social media profile mentions employment with the Company, a disclaimer must be issued prior to making any post that the post is not on behalf of the Company.
- Keep in mind that any conduct that adversely affects job performance or the performance of fellow employees, or otherwise adversely affects our tenants, vendors, business associates or the Company's legitimate business interests may result in disciplinary action, up to and including termination of employment.

Last Updated 08/15/2020 14:14:40 ET



6265

Conduct – Use of Company Property

Purpose

Pantzer Operations is committed to safeguarding its physical property from damage and unapproved uses and protecting the integrity of business and proprietary data that resides within the Company's technology infrastructure.

Standard

Proper Use of Company Equipment and Services

- Electronic communication systems, including electronic mail (email), voicemail, and internet are essential for business.
- Acceptable uses of these electronic resources make communication more efficient and effective while unacceptable uses put the Company at risk.

Resources

- In order to assist employees in job performance, the Company provides access to a variety of services and equipment including:
 - Mail service (U.S. Postal Service, overnight delivery and messenger services, etc.)
 - Telephone service (including voicemail, etc.)
 - Web-based services (e-mail, Internet access, etc.)
 - Equipment (computers, telephones, photocopiers, postage and facsimile machines, etc.)
- Employees are not permitted to remove any Company information technology resources without authorization from their supervisor.

Personal Property/Property Inspection

- The Company does not assume responsibility for the loss, theft, or destruction of any personal property that is brought onto Company premises. Employees should take care in safeguarding personal belongings on Company premises.
- The Company reserves the right to inspect all packages, briefcases, bags, and other containers brought onto Company premises.

Last Updated 08/06/2020 13:41:59 ET



Conduct – Use of IT Resources

Purpose

Pantzer Operations has established guidelines to help employees understand the restrictions on their use of the company's information technology (IT) resources. Appropriate use of such resources safeguards the integrity of our technological infrastructure and data while protecting employees from any liability resulting from violations of Pantzer's policies and/or applicable laws.

Standard

No Expectation of Privacy

- All contents of the Company's IT resources and electronic communications systems are the property of the Company. Employees should have no expectation of privacy whatsoever in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, document, or any other kind or form of information or communication transmitted to, received or printed from, or stored or recorded on the Company's electronic information and communications systems.
- The Company reserves the right to monitor, access, intercept, review, and disclose, without further notice, all employee activities using the Company's IT resources and electronic communication systems, including but not limited to email (both outgoing and incoming), telephone conversations and voicemail recordings, files, documents, instant messages and internet and social media postings and activities.
 - For example, the Company may monitor network computer files, computer and internet usage, and the email system, to ensure compliance with this or any other applicable rule or procedure, to investigate misconduct, for legitimate business reasons, or as required by legal process.
 - Employees consent to such monitoring by acknowledgement of this Handbook and employee use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, documents, files, recordings, and other uses of the systems as well as keystroke capturing and other network monitoring technologies.
- Deleting an email message does not guarantee that it has been erased from the system. The Company may also store copies of such data and communications for a period of time after they are created, and may delete such copies from time to time without notice.

Use of Email/Internet/Video Recordings

- Employees must be aware of the following:
 - Software purchased by the Company may only be installed on Company computers or workstations, and only on those units for which it was purchased. Software is often governed by strict copyright and trademark laws and may not be copied unless authorized by its publisher in writing.
 - Downloading of any programs, data, or other material, unless expressly approved by management, is prohibited. Not only is the Company concerned about inappropriate materials and copyright infringement, but special care is especially needed to protect against the spread of viruses.
 - Since confidentiality cannot be assured when using the internet or email, transmission of confidential or proprietary information is discouraged unless appropriate precautions are taken. Sending encrypted information or documents without proper authority or permission, or sending Company documents, data, lists programs, or any other proprietary information to anyone outside the Company or without the "need to know," is prohibited.
 - The Company's policy against harassment applies fully to the use of the internet and email.
 - Accordingly, acquisition and/or dissemination of inappropriate materials, including but not limited to those that contain sexual innuendo, pornographic material, improper jokes, harassing or threatening statements, or any statement that could be negatively perceived by others or considered hostile or offensive based on membership in any protected classification, including but not limited to sex, race, creed, color, age, religion, national origin, marital or domestic partnership or civil union status, affectional or sexual orientation, gender identity or expression or disability, is strictly prohibited.
 - No abusive, profane or offensive language is to be transmitted through the internet or email. No fraudulent or illegal activities should be engaged in using Company systems or equipment.
 - Employees should not share passwords or access codes with anyone inside or outside the Company.
 - Visiting any game or entertainment sites is prohibited.

- The sending of "chain letters" or "broadcast" messages to lists of individuals, or any other use that, knowingly or unknowingly, may cause congestion of or harm to, the Company's computer systems or databases, is prohibited. Delete all such messages immediately upon receipt.
- All messages transmitted on the internet and via email should have the employee's name attached and no messages should be transmitted under an assumed name.
- All emails are Company records and can be used as evidence in a court of law.
- Employee use of the internet and email is a privilege that may be revoked at any time.
- Employees are prohibited from sharing any video recordings from the property surveillance cameras with anyone outside of Pantzer Operations.
 - Follow SOP 1070 Law Enforcement Information Request if any requests to view recordings are from the police.

Personal Use

- Pantzer recognize that employees might work long hours and may desire, from time to time, to use Company-provided email or the Company's computers, networks and other IT resources and communications systems for occasional personal use. Such use is allowed, consistent with this policy, as long as it does not involve unprofessional or inappropriate content, violate other Company policies, and does not interfere with employment responsibilities or productivity.
 - Occasional personal use means infrequent, incidental use that does not interfere with the Company's business, employee performance, or the availability of IT resources and electronic communications systems. Please refer to the Conduct – Social Media policy for more information about personal use of social media.

Business/Internal Use of Social Media

- The Company maintains social media accounts that may require certain employees to maintain those accounts or make postings on those accounts. Employees required to use social media as part of job duties for the Company's marketing, public relations, recruitment, corporate communications, or other business purposes must follow all guidelines.
 - Employees are required to provide all log-in information for all Company accounts to their supervisor, including any updates to such information.
- If job duties require an employee to speak on behalf of the Company in a social media environment, approval from the supervisor must be received for such communication.
 - Training may be required prior to posting on Company social media accounts.
- If an employee is contacted for comment about the Company for publication, including in any social media outlet, please direct the inquiry to the HR Director and do not respond without written approval.

Last Updated 02/28/2023 17:07:00 ET



6275

Conduct – Travel and Expenses Reimbursement

Purpose

The Pantzer Employee Travel & Business Expense Reimbursement Policy is intended to provide reasonable uniform guidelines for appropriate, necessary and approved travel and business-related costs and activities. Employees are expected to exercise prudent business judgment regarding expenses covered by the Policy. While the Policy does not cover every possible situation, it should be utilized to make appropriate judgments about travel and other business expenditures. This policy applies to all Pantzer employees. **Employees are to submit only one expense report per employee through Concur monthly.**

Standard

The American Express Corporate Card (AMEX Card) provides a payment method for employee business expenses for employees expected to travel on Pantzer business multiple times a year or incur significant travel expenses. The AMEX Card is to be used exclusively for Travel and Entertainment. In addition, employees are expected to assist in cost control efforts by using prudent judgment and staying within company guidelines.

General Responsibilities

Use of American Express Card: Pantzer employees who use the AMEX Card bear ultimate responsibility for the Card. This means ensuring American Express is paid on time (by the statement due date) for all charges incurred, regardless of the status of reimbursement. The AMEX Card must only be used for approved business purchases. Personal purchases are not allowed. Pantzer will audit the use of the AMEX Card on a regular basis and report and take appropriate action on any discrepancies. Upon termination of employment, you must return the Card immediately and the credit card account must be reconciled prior to your departure. If the Card is lost or stolen, you must notify the Corporate Card Administrator directly and American Express immediately.

Corporate/Regional Employees: Pantzer employees who use the AMEX Card are entrusted with a valuable tool and will be making financial commitments on behalf of the company. While using the Card, employees must strive to obtain the best possible value for the company. It is imperative to follow the Travel and Expense Policy and other relevant procedures established, as we have a fiduciary responsibility to the funds, our investors, and our partners. Failure to do so may result in either revocation of your Card privileges, or other disciplinary action. If for valid business reasons an employee cannot comply with the Company's Business Travel and Expense Reimbursement policies, the reason for exception should be noted and initialed by the employee and the person approving the expense account. As a matter of general Company policy governing business expenses, the Company will not provide expense reimbursement for any entertainment or business expenses that the Company deems, in its sole and absolute discretion, to be offensive to our employees and/or members of our community and/or generally shows a lack of judgment with respect to how we conduct our business:

- Employees will be required to submit only one monthly expense report within two business days after the AMEX Card billing cycle ends along with supporting receipt documentation monthly in Concur to receive reimbursement for out-of-pocket expenses and charges made to the AMEX Card for approval.
- Each expense must include the proper Expense Category, the date, amount and business purpose of the expense, the name and location of the business and name of all attendees, if applicable.
- The business purpose field of each expense must be clearly stated. If the description is not clear, your expense report will be returned and your reimbursement may be delayed.
- Acceptable documentation to support expense reimbursement requests includes the following:
 - A copy of the passenger/guest receipt should be provided as a receipt for air, rail, and hotel travel expenses.
 - The itemized receipt for meal and entertainment expenses must be provided. This is the copy of the receipt typically provided prior to or at the time of payment that lists the food and beverages purchased (not just the signature page).
 - The summary page of telephone, cellular phone, and internet statements identifying the current period charges.
 - Receipt Requirements: Corporate Card expenses Itemized receipts must be provided for all hotel, car service, and car rental expenses Non-Corporate Card expenses (cash or personal card) Receipts must be provided for all business expenses greater than \$25. If you lost a receipt, it is your responsibility to obtain a copy of it from the merchant/provider.

- Acceptable travel and business expenses: **If multiple employees are attending an event or having a meal together, the most senior title employee attending will pay and submit on their monthly expense report.**
 - Air Travel:
 - Best efforts should be made to book air travel at least 7 days prior to travel
 - Add-On Fees including but not limited to bag fees and advanced seat selections
 - AMTRAK:
 - Refundable Coach and Business fares
 - Lodging:
 - Hotel room rates not to exceed \$300/night or \$450/night in major metropolitan areas (New York, Philadelphia, Boston, Washington, DC Area, South Florida)
 - Car Rental and Gas:
 - Full-size vehicle or SUV are the maximum size allowed to be rented.
 - Whenever possible, carpool with your fellow Pantzer co-workers.
 - Obtain insurance offered through the car rental agency
 - Parking and Tolls: In connection with the operation of personal or rented vehicles for business purposes.
 - Internet Connectivity
 - Mileage equal to the length of the trip minus the employee's normal commute will be reimbursed at current IRS rate.
 - Cancellations must be completed in time to avoid a "no-show" charge. Any fees assessed for failure to cancel a reservation will be the employee's responsibility.
 - Business Meals and Entertainment, must include all attendees, including titles in description.
 - Property/Employee Meals:
 - Breakfast \$25/person
 - Lunch \$35/person
 - Dinner \$75/person
 - Business/Client Meals:
 - Breakfast \$35/person
 - Lunch \$65/person
 - Dinner \$150/person
 - Employees working approved overtime after 8pm may order dinner to the office, \$35 limit per person per night
 - Tipping - Tips included on meal receipts will be reimbursed. However, tips should be based on the quality of the service received and should be no more than the accepted norm: 15%-20% of the bill in the US. Some hotels and restaurants include a gratuity in the bill, in which case an additional tip is not necessary. Any tips considered lavish, excessive or unreasonable in relation to the guidelines noted above may not be reimbursed. As a general rule, employees should not tip more than they would if meal was on a personal level.
- Acceptable Property Related Business Expenses: Properties should make every effort to have all vendors paid via invoice through OPS Technology and enrollment in Compliance Depot
 - Property Staff Meetings/Events
 - Emergency Maintenance Supplies
 - Hardware, Keys and Locks
 - Postage

Policy Exceptions: If an employee would like to be reimbursed for an amount outside of the items identified above, he or she must receive approval from your Supervisor. Employees should plan ahead when possible to avoid unnecessary "Emergency" purchases for general office and maintenance supplies.

- The AMEX Card must not be used to pay any vendor that requires a Certificate of Insurance.
- The AMEX Card must not be used as a reimbursement payment to a resident.
- The AMEX Card must not be used to reimburse employees for mileage, an expense report must be submitted through Concur.
- The AMEX Card must not be used to purchase any gift cards for resident promotions and concessions or employee awards and incentives.
- **Non-acceptable travel and business expenses:**
 - Cost of a family member accompanying an employee on a business trip
 - Air/Ground/Hotel upgrades
 - Side trips and additional hotel nights for personal use
 - Honor Bar Purchases
 - Personal Recreational Activities
 - Calls placed from the hotel room, unless a Company or personal cell phone is not available
 - Dry-Cleaning/Laundry (unless hotel stay is three or more consecutive nights)
 - Trip Interruption Coverage
 - Travel Related Accidental Death and Dismemberment or Life Insurance Coverage

- ATM Fees
- Late fees
- Damaged, stolen, or lost personal funds or property/lost baggage
- Haircuts, personal grooming and toiletries
- Luggage, briefcases, and computer cases
- Personal entertainment expenses (including but not limited to in-flight movies, headsets, hotel pay-per-view movies)
- Personal subscriptions, sponsorships, contributions, and donations
- Shoeshine services
- Speeding or Parking Ticket/Towing or other fines
- Inappropriate entertainment dues and expenses
- Resident gifts/concessions
- Staff incentives/gifts – to be paid through ADP/Payroll only

Task Breakdown

1. **The total amount of your Concur report, minus any out of pocket expenses, MUST equal the American Express Credit Card Statement ending balance. You should not submit a concur report until you receive an email from American Express that your Credit Card Statement is ready.**
2. **Monthly expense report to be submitted for approval within two business days after the AMEX Card billing cycle ends to ensure expenses are processed to correspond with the monthly credit card statement and due date. Any late charges or interest charges as a result of a late expense report submission will be the employee's responsibility. Employees are to submit only one expense report to include both personal and AMEX charges through Concur monthly.**
3. Log in to www.concursolutions.com
4. During the initial log in, employee will need to click on the Profile Settings to link their personal bank account > Bank Information
5. To create an expense report, click on "Start a Report"
6. Add the "Report Name", click on "Create Report"
7. Click on "Add Expense"; all sections with the red * are required fields
8. Choose a Category > Expense Type
9. Enter Transaction Date
10. Enter Business Purpose; must include specific details for the expense/trip.
 - a. Ex: Hotel - Travel to NY office to review 2022 Budget, 10/15-10/17
11. Enter Vendor
12. Enter Payment Type (Out-of-Pocket, Company Paid)
13. Enter Amount
14. Enter the Location the expense will be charged:
 - a. If expense is to be split to the total portfolio OR multiple properties, click on "Allocate" to charge each property the correct amount based on unit count, to determine the allocation percentages:
 - Divide the property unit count by the total portfolio (RVP, RPM, RMS, SPM, or Total Portfolio) unit count;
 - Allocations will need to be updated as property assignments change, property acquisitions and dispositions
 - b. Travel related to specific properties should be billed to the properties (All Employees)
 - c. Travel to corporate offices (NY, NJ, Philadelphia):
 - PM, RPM, RMS, RVP – Charge to the properties they oversee; in Concur, use any of the properties included in the allocation for location, allocate expense by unit count
 - Corporate Employees – Travel billed to Total Portfolio, in Concur, use "NJ Office" for location, allocate expense by unit count
 - d. Travel related to acquisitions/due diligence should be billed to the FUND, until property is acquired, then it would be billed to the property
15. Attach receipt image
16. For Personal Car Mileage, click on Mileage Calculator to calculate the total miles and click on "Deduct Commute" to reduce the standard daily commute to your home office/property; click on "Add Mileage to Expense"
17. Click Save Expense or Save and Add Another if there are additional expenses for the report.
18. Once all expenses and supporting documents have been entered, click on Print/Share Detailed Report to review your expenses. If the report is complete and all AMEX charges have cleared (no pending charges), click on "Submit Report". Should be submitted within two business days after the AMEX Card billing cycle ends to ensure enough time for payment to be sent by the AMEX due date.
19. Report will be sent to your direct supervisor for approval
20. Personal out-of-pocket expenses will be paid via direct deposit to your bank account.

Last Updated 06/24/2026 09:28:56 ET

**6300****Safety – General****Purpose**

Pantzer Operations is committed to maintaining the highest standards of workplace safety for all employees and visitors.

Standard

- The Company may provide information about workplace safety and health issues through meetings with the supervisor or written communications.
 - Any ideas, concerns, or suggestions for improved safety in the workplace, may be presented to the supervisor.
- Employees are expected to obey safety rules and to exercise caution in all work activities.
 - Unsafe conditions must be immediately reported to the appropriate supervisor.
- Employees who violate safety standards, or fail to report such situations, may be subject to disciplinary actions, up to and including termination of employment.

Last Updated 08/06/2020 13:26:03 ET



Safety – Drugs and Alcohol

Purpose

Pantzer Operations is committed to providing a safe and productive environment to employees, vendors, and tenants. Employees under the influence of drugs and/or alcohol at work are a hazard to themselves and others and reduce morale, productivity, and efficiency.

It is a violation of Company policy to work under the influence of any alcohol, non-prescribed drugs, or any substance that results in either physical or mental impairment in any way so as to interfere with the safe performance of one's job duties. It is also a violation of Company policy to manufacture, distribute, dispense, buy, sell, possess or use alcohol, illegal drugs, or drug paraphernalia on Company time or premises or at Company events.

While the Company is committed to a work environment free from drug and alcohol abuse, it is also committed to assisting employees that voluntarily request rehabilitation before a work-related problem arises.

Standard

Prescription Drugs

- Abuse of prescription drugs includes using a lawfully prescribed medication other than in accordance with the prescribed instructions, taking a prescription medication prescribed for someone else, and/or distribution, dispensing, buying, or selling prescribed medication.
- The use of prescription or over-the-counter medication which could suppress, alter, or diminish normal reflexes, or attentiveness, and pose a direct threat to health and safety during working hours, should be reported to the HR Director.
 - This report is intended to facilitate a discussion with an employee about whether it is necessary to have a temporary change in work assignment, at the discretion of the Company, or a period of leave during the time the medication is used.
- Employees may possess and use a prescription medication or over-the-counter medication while at work in accordance with the prescription or instructions for such medication.

Substance Abuse Testing

- The Company reserves the right and may, at its discretion, test for the presence of drugs and/or alcohol after offering employment to an applicant, as well as when it has "reasonable suspicion" to believe that an employee has violated this policy.
- Employees that violate this policy in any way, including but not limited to reporting to work under the influence of drugs and/or alcohol, refusing required testing, having a confirmed positive test, or tampering with a testing specimen, shall be subject to disciplinary action, up to and including termination of employment.
- The Company encourages employees with a drug and/or alcohol abuse problem to obtain early assistance.
 - Employees that suffer from personal drug or alcohol problems, can request assistance from the Company's confidential Employee Assistance Program (EAP). When appropriate, the Company may engage in an interactive process with an employee to determine how best to address any drug or alcohol problems.
 - Employees that voluntarily admit to a supervisor that they have a drug and/or alcohol problem, and ask for help prior to committing an act or engaging in behavior warranting testing and/or disciplinary actions, may be granted a medical leave of absence to participate in a rehabilitation program approved by the Company.
 - In that case, employees may be required to provide information regarding participation in the rehabilitation program, and may be subject to continuing post-treatment random testing in accordance with applicable law.
 - Request for assistance will not be treated as voluntary if the Company suspects impairment or is about to send or has sent, an employee for testing.
- Testing will be in compliance with applicable federal and state law, and information and results will not be disclosed to anyone who does not have a legitimate, bona fide need to know. Any action taken under this policy will be consistent with applicable state law.

Last Updated 09/01/2021 14:28:04 ET



Safety – Operating Vehicles

Purpose

Pantzer Operations is committed to employees driving safely on all roadways and within our properties while conducting business for Pantzer.

Standard

General

- Employees driving a vehicle (company-owned, rented/leased, or a personal vehicle) on behalf of Pantzer must have a valid driver's license, appropriate insurance per state requirements, and an acceptable driving record.
 - Employees must immediately report any change in license status or driving record to management.
- Employees are responsible for following all traffic laws, speed limits, and parking regulations, and for driving safely at all times while conducting business for Pantzer.
- Employees should wear seat belts at all times while traveling by car on company-approved business.
- Smoking is not permitted within company vehicles.
- Employees are not permitted to take company vehicles home at the end of the business day.
- Employees should practice defensive driving techniques to proactively protect themselves and others from accidents.
- Violations of any aspect of this policy may be cause for disciplinary action, up to and including termination.

Distracted Driving

- Employees must avoid all forms of distracted driving while operating any vehicle on behalf of Pantzer.
- Employees' use of handheld phones or other handheld electronic devices while driving can pose a significant risk to motorists, their passengers, and others on the road. Pantzer considers employee distraction by such devices while driving a significant concern and a violation of company policy.
- The company does not allow employees to use handheld phones or devices while operating a vehicle on Pantzer time. This includes, but is not limited to:
 - Answering, making, or engaging in phone calls
 - Reading or responding to emails and text messages/texting
 - Taking pictures
 - Surfing the internet/intranet
- If a call or text must be made or received while on the road, the employee must first pull off the road away from traffic and come to a complete stop before continuing the call. The employee must remain there for the duration of the communication.
- **Exception:** The only exception to the use of a cellular phone or other portable device while operating a vehicle is if a hands-free headset is used to conduct a phone call, if permitted by law.

Procedure

Practice Defensive Driving

1. Use defensive driving skills to avoid dangers on the road:
 - a. Look ahead, and expect the unexpected.
 - b. Control your speed.
 - c. Maintain a safe following distance.
 - d. Prepare for the reactions of other drivers.
 - e. Drive safely for weather and/or road conditions.
 - f. Be alert and distraction free.
 - g. Watch and respect other drivers.

Last Updated 09/02/2021 11:01:37 ET

**6320**

Safety – Accidents, Injuries, or Illnesses

Purpose

Pantzer Operations is committed to maintaining the highest standards of workplace safety for all employees and visitors.

Standard

- If an employee, a tenant, or other member of the public is injured in any way or becomes ill while on Company premises, assistance and proper medical attention should be sought immediately.
 - If emergency treatment is required, 911 should be called by the ill/injured person or those assisting him or her.
- If an accident or injury occurs during the authorized performance of business away from Company premises, employees should seek immediate assistance and, if necessary, medical treatment at the nearest medical facility.
- All accidents, regardless of how minor, must be reported to the department supervisor and the HR Director as soon as possible, even if there appears to be no personal injury.
 - A written report of the accident must be completed by the involved parties as soon as possible following the accident and submitted to the appropriate insurance administrator.
 - Failure to report any injury may jeopardize insurance coverage and delay necessary medical treatment.

Procedure

1. Seek assistance and proper medical attention if you, a tenant, or other member of the public is injured in any way or becomes ill while on Company premises.
2. Seek immediate assistance and, if necessary, medical treatment at the nearest medical facility if an accident or injury occurs during the authorized performance of business away from Company premises.
3. A completed report of the accident must be submitted to the appropriate insurance administrator as soon as possible following the accident.

Last Updated 08/19/2020 11:56:58 ET

**Purpose**

Pantzer Operations allows smoking in designated areas only. "Smoking" includes the use of tobacco-like products such as e-cigarettes, vaping devices, etc.

Standard

- Employees may not smoke in front of customers, vendors, or residents while on company property.
- Smoking is not permitted within any company buildings or company vehicles, including the following:
 - Occupied or vacant apartments
 - Maintenance shop
 - Common areas
 - Golf carts
 - Pantzer-provided vehicles
 - In or around the leasing office
- Employees must throw away any smoking debris carefully and properly.

Last Updated 09/02/2021 10:12:21 ET

**Safety – Violence Prevention****Purpose**

Pantzer Operations is committed to providing a safe workplace that is free from violence.

Standard

- Acts or threats of physical violence, including intimidation, harassment and/or coercion that involve or affect the Company, employees, or third parties that occur on or off Company property, will not be tolerated.
- Specific examples of conduct that may be considered threats or acts of violence under this policy include, but are not limited to, the following:
 - Directly or indirectly threatening physical or aggressive contact directed toward another individual
 - The intentional destruction or threat of destruction of Company property or another's property
 - Harassing or threatening phone calls
 - Surveillance and/or stalking
 - Horseplay
 - Any activity that can be perceived as intended to inflict, or that may potentially result in, physical harm or property damage
- Employees are strongly encouraged to immediately report to the police any incidents of potentially threatening, harmful, or criminal behavior of co-workers, supervisors, tenants, or visitors that may negatively affect the safety, security, productivity, or financial interests of the Company or its workplace.
- Violations of this policy by any individual may lead to disciplinary and/or legal action as appropriate.

Last Updated 08/03/2020 14:37:41 ET



Termination – Resignations

Purpose

A voluntary termination occurs when the employee chooses to resign from Pantzer Operations.

Standard

- Employees should give written notice to their manager at least 10 working business days in advance.
 - Paid time off does not count towards the notice period.
 - Employees who choose not to give sufficient notice are not eligible for rehire.
- The decision to allow the employee to work out his or her notice is determined by the management team and the HR Director.
- Employees leaving the company should do so in a professional manner, consistent with Pantzer's values, ethics, and expected conduct.
- Departing employees are encouraged to participate in the exit interview, and to provide candid and constructive feedback so that Pantzer can continuously improve the workplace experience.

Procedure

To Resign from Pantzer

1. Send your notice in writing to your manager with the appropriate notice period.
2. Participate in the exit interview, as appropriate.
3. Ensure your home address, email, phone, and other contact information are current with the Payroll Manager.
4. Contact the HR Director with any questions regarding pay and benefits.
 - a. If applicable, Pantzer will send information regarding benefit continuation to your home address on file.
5. Turn in all company items (computer, cell phone, badge, keys, security cards, parking passes, credit cards, etc.) as well as any confidential information (hard or soft copy) to your immediate manager.
6. Submit any outstanding business expenses and receipts.

Resources

- [Termination – Exit Interview](#)

Last Updated 07/28/2020 16:18:08 ET

**Termination – Exit Interview****Purpose**

Pantzer Operations typically conducts an exit interview when an employee resigns. The exit interview gives employees the opportunity to describe their experiences at Pantzer, as well as contribute ideas and make recommendations for improvement.

Standard

- Employees who resign are encouraged to participate in the exit interview and to be honest with both positive and constructive feedback.
- The exit interview may occur in person, via phone, or online on or before the employee's last day.
- When notified of the employee's resignation, the HR Director will schedule the exit interview with the departing employee prior to his or her last day. Employees are also encouraged to proactively contact the HR Director for the exit interview.

Last Updated 09/02/2021 10:12:39 ET



6350

Acknowledgment – Handbook**Standard**

I have received a copy of the Employee Handbook date February 2020 for use and reference during my employment at the Company. I understand that this Handbook is intended to provide information regarding the Company's employment practices and policies, and that this Handbook and the practices and policies it contains, except the Company's employment-at-will policy, are subject to change at any time, with or without notice, at the company's sole and absolute discretion. I also understand that this Handbook replaces all previously issued handbooks and policy statements on the subjects contained herein. **THIS HANDBOOK DOES NOT CONSTITUTE A CONTRACT OR OBLIGATION ON THE PART OF THE COMPANY, AND DOES NOT GUARANTEE MY EMPLOYMENT FOR ANY SPECIFIC DURATION.**

I ACKNOWLEDGE THAT EMPLOYMENT WITH THE COMPANY IS "AT WILL," WHICH MEANS THAT IT IS FOR NO DEFINITE PERIOD, AND MAY BE TERMINATED AT ANY TIME BY EITHER MYSELF OR THE COMPANY WITH OR WITHOUT CAUSE AND WITH OR WITHOUT ADVANCED NOTICE. NEITHER THIS HANDBOOK, NOR ANY OTHER COMPANY POLICY, PROCEDURE OR COMMUNICATION, SHALL CREATE ANY RIGHT FOR MYSELF OR GUARANTEE EMPLOYMENT FOR ANY PERIOD. NO REPRESENTATIVE OF THE COMPANY, OTHER THAN THE CHIEF EXECUTIVE OFFICER, AND IN WRITING, MAY ENTER INTO ANY AGREEMENTS, OR MAKE ANY REPRESENTATIONS, WRITTEN OR ORAL, TO ALTER MY AT-WILL STATUS OR OTHERWISE CREATE A CONTRACTUAL OBLIGATION.

I have read and understand the above statements, and I understand that it is my responsibility to read and comply with the policies contained in this Handbook and any revisions made to it, as a condition of continued employment.

If there is anything in this Handbook that I do not understand or have a question about, I will contact my supervisor or the HR Director.

Date of Receipt: _____

Employee Signature and Date

Employee Printed Name

Last Updated 09/02/2021 10:21:11 ET

**State Addendum – Delaware****Purpose**

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

Neither this document nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by the Company, or may resign for any reason at any time.

The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard**Crime Victim Leave**

- Employees may take unpaid time off from work for participation at the prosecutor's request in preparing for a criminal justice proceeding, attendance at a criminal justice proceeding if the attendance is reasonably necessary to protect the interests of the victim, or attendance at a criminal justice proceeding in response to a subpoena.
- Employees are eligible for time off for the following:
 - The victim of the crime at issue in the proceedings
 - The parent, guardian, or custodian of a victim who is unable to meaningfully understand or participate in the legal process due to physical, psychological, or mental impairment
 - The spouse (includes same-sex civil unions, domestic partnerships, and marriages), adult child or stepchild, parent, or sibling of the victim if the victim is deceased
 - The legal representative of the victim (i.e., a member of the victim's family or an individual designated by the victim or by the court)
- Employees may, but are not required to, use accrued paid time off.
- Employees are not eligible for time off if they are a defendant, codefendant, or co-conspirator with respect to the crime.

Jury Duty Leave

- In addition to the Time Off – Jury and Witness Duty policy, employees may take unpaid leave to respond to a summons.

Election Duty Leave

- Employees that serve as an election official, will be granted unpaid leave to perform the duties of the election official position. Proper documentation of appointment and the dates of the required service must be furnished to the Company in advance.

Employment Protection During Quarantine

- Employees will not be terminated because of isolation or quarantine by the public safety authority.
- These protections do not apply to a person who is quarantined as a result of refusing to comply with an examination, treatment or vaccination program, or to a person whose conduct caused the state of emergency that necessitated the isolation or quarantine.

Meal Periods

- Nonexempt employees are provided with one meal period of 30 minutes in length each workday when seven and one-half or more hours are worked.
- Supervisors will schedule meal periods to occur after the first two hours of work and before the last two hours of work.
- Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time.
- Failure to return on time for breaks or lunch may subject employee to disciplinary action.

Volunteer Emergency Responder Leave

- Employees may be eligible for time off work to serve as a volunteer of the fire department, ladies' auxiliary of a volunteer fire company, emergency medical technician, or police officer as follows:
 - Up to seven consecutive days while responding to a Governor-declared state of emergency.
 - Up to 14 consecutive days while responding to a President-declared state of emergency.
 - Absence due to an injury sustained while acting as a volunteer emergency responder.
- Employees must contact their supervisor as soon as they are aware that they expect to be late to work, or are unable to report to work due to the emergency dispatch.
- If requested, provide the supervisor with a statement from the appropriate department/organization documenting the response to an emergency call.
- Time off for this leave will be unpaid for nonexempt employees. Exempt employees will be paid in accordance with federal and state wage and hour laws.

Sexual Harassment

- The Company strictly prohibits the harassment of employees, interns, independent contractors, other non-employee service providers, or any other covered person based on that individual's sex or gender (including pregnancy and status as a transgender or transsexual individual) and regardless of the harasser's sex or gender.
- Please refer to the [Nondiscrimination/Anti-Harassment and Retaliation](#) policy for more information.

Last Updated 11/01/2021 18:09:49 ET



State Addendum – Maryland

Purpose

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

Neither this document nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by the Company, or may resign for any reason at any time.

The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard

Accommodations for Disabilities Due to Pregnancy

- If employees are pregnant and may need an accommodation, please contact the HR Director. The Company will consider possible accommodations, including:
 - Changing an employee's job duties
 - Changing an employee's work hours
 - Relocating an employee's work area
 - Providing mechanical or electrical aids
 - Transferring an employee to a less strenuous or less hazardous position
 - Providing leave
- If an employee requests a transfer to a less strenuous or less hazardous position as a reasonable accommodation, the Company will honor the request of the healthcare provider if the transfer will not result in the following:
 - Creation of an additional position
 - Discharge of existing employees
 - Transfer of any employee with more seniority than the requesting employee
 - Promote any employee who is not qualified to perform the job

Civil Air Patrol Leave

- Employees may request up to 15 days of unpaid leave per year to respond to an emergency operational mission of the Maryland Civil Air Patrol.
- Employees must have been employed for at least 90 days immediately preceding the commencement of leave.
- Upon expiration of the leave, employees will generally be reinstated to their position with equivalent seniority, benefits, pay and other terms and conditions of employment.
- Employees must notify their supervisor as soon as becoming aware of the need for such leave. Leave approval is based upon receipt of certification from the proper Civil Air Patrol Authority of eligibility to take such leave. Failure to provide the required certification will result in denial of leave.
- Employees may, but are not required to, use any accrued paid time off.

Crime Victims Leave

- Employees may take unpaid time off from work to respond to a subpoena or other court order or to attend any proceeding in which the defendant or juvenile has the right to appear, including (but not limited to) a trial or adjudicatory hearing.
- Employees are eligible to take leave if they are:
 - The victim of the crime or juvenile delinquent act at issue in the proceedings
 - The victim's next of kin or guardian when the victim is deceased or disabled
 - The victim's representative appointed by the court
- Employees may, but are not required to, use any accrued paid time off.

Voting Leave

- The Company encourages employees to exercise their voting privileges in local, state, and national elections. However, employees are encouraged to vote before or after regular working hours.
- If an employee's work schedule interferes with polling hours, he or she may be eligible to take up to two hours of paid time off from work to vote.
- Exempt employees may be provided time off with pay when necessary to comply with federal and state wage and hour laws.

Jury Duty Leave

- In addition to the Time Off – Jury and Witness Duty policy, employees will not be penalized, terminated, or disciplined based on taking jury leave in response to a summons.
- If an employee appears for jury duty for four or more hours in one day, including travel time, they may not be required to start any work shift that begins on or after 5:00 p.m. on the day of or before 3:00 a.m. on the day after appearing for jury duty.

Deployment Leave

- Eligible employees are able to take leave on the day that an immediate family member is leaving for, or returning from, active duty outside the United States as a member of the armed forces of the United States.
 - Eligible employees include those who work full- or part-time, have worked for the employer for the last 12 months, and have worked at least 1,250 hours during the last 12 months.
 - Immediate family members include employees' spouse, parent, stepparent, child, stepchild, or sibling.
- Employees may not be required to use paid time off when taking leave under this section. However, the Company may require employees to submit proof verifying that the leave is being taken in accordance with this section.

Paid Sick Leave

- The Company's paid time off policy provides paid time off benefits sufficient to meet or exceed the requirements of Maryland's law regarding safe and sick leave.
- Please contact the HR Director with any questions.

Last Updated 11/01/2021 18:05:16 ET



State Addendum – Massachusetts

Purpose

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

Neither this document nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by the Company, or may resign for any reason at any time.

The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard

Veterans Day and Memorial Day Leave

- Employees who are veterans, or a member of a department of war veterans, are eligible to take leave to participate in a Veterans Day or Memorial Day exercise, parade, or service.

Paid Family Medical Leave

- Employees are eligible for leave when they have either completed the initial probationary period of no more than three months, or if there is not a set probationary period, been employed full-time by the same employer for at least three consecutive months.
- Employees may take leave for up to eight weeks. However, if both parents work for the same employer, they are entitled to a combined eight weeks.
- Employees are able to take leave for the birth of a child or for the placement of a child with the employee, if the employee is adopting or intending to adopt a child under the age of 18 or under the age of 23, if the child is mentally or physically disabled.
- Employees are eligible if they meet the financial eligibility requirements for receiving unemployment compensation under Massachusetts law (have earned 30 times the weekly unemployment benefit amount the employee would be eligible to receive and earned at least \$4,700 during the last four calendar months).
- There is a seven-day waiting period before leave can be used, except if the employee seeks medical leave during pregnancy or recovery from childbirth where the need for such leave is immediate and supported by documentation from a health care provider.
 - During the waiting period, employees may use accrued paid time off or other paid leave.
- All leave will run concurrently with other applicable paid and/or unpaid leave, as permitted by law.
- Employees may not take more than 26 weeks in the aggregate in a given benefit year. The amount of the weekly benefit is determined by State law.
- Beginning in 2021, eligible employees will be permitted to take:
 - Up to 20 weeks of job-protected paid medical leave to care for their own serious health condition
 - Up to 12 weeks of job-protected paid leave to care for a family member with a serious health condition
 - Up to 12 weeks of job-protected paid family leave during the first 12 months after the birth of a child, or the first 12 months after the placement of the child for adoption or foster care with the employee
 - Up to 12 weeks of job-protected paid family leave for a qualifying exigency arising out of a family member being on active duty or notification of an impending call or order to in the armed forces
 - Up to 26 weeks of job-protected paid family leave to care for a covered service member
- Employees will be reinstated to their original position upon return from leave.
- Contact the HR Director for any questions regarding this policy.

Paid Sick Leave

- The Company's paid time off policy provides paid time off benefits sufficient to meet or exceed requirements of the Healthy Workplaces/Healthy Families Act of 2014 Paid Sick Leave ("MA Paid Sick Leave Law").

Victim and Witness Leave

- Employees are eligible for unpaid leave under this law if they are a victim of or a witness to a crime or subpoenaed to testify in a criminal proceeding.
- Employees may, but are not required, to substitute any accrued but unused paid time off.

Firefighter and Emergency Medical Technicians Leave

- Employees who are a volunteer member of a fire department or ambulance department are eligible for leave to respond to an emergency as a volunteer member of either a fire department or an ambulance department.
- A volunteer member does not include any person who received compensation for over 975 hours of services rendered as a firefighter or emergency medical technician in the preceding six-month period.

Meal Breaks

- Employees who work more than six hours in a day are entitled to an unpaid meal period of at least 30 minutes and will be relieved of all active responsibilities and restrictions.
- Failure to return on time from breaks or lunch may lead to disciplinary actions, up to and including termination.

Jury Duty and Court Attendance Leave

- Regular employees who serve as a trial or grand juror shall be paid regular wages by the Company for the first three days, or part thereof, of juror service.
- Regular employees include part- and full-time, temporary, and casual employees as long as the employment hours of a juror reasonably may be determined by a schedule or by custom and practice established during the three-month period preceding the term of service of such juror.

Domestic Violence Leave

- Employees are eligible for unpaid leave of up to 15 days during any 12-month period if the employee is a victim or the family member of a victim of abusive behavior.
- Leave can be used to address issues directly related to the abusive behavior against the employee or family member. Such issues include, but are not limited to:
 - Seeking or obtain medical attention, counseling, victim services or legal assistance
 - Securing housing
 - Obtaining a protective court order, appearing in court, meeting with a district attorney or other law enforcement official
 - Attending child custody proceedings
- Employees who are the perpetrator of the abusive behavior against such their family member are not eligible.
- Except in cases of imminent danger to health and safety, employees should provide appropriate notice of the leave to the Company.
- Employees may, but are not required, to substitute any accrued paid time off.

Last Updated 08/15/2020 19:05:02 ET



State Addendum – New Jersey

Purpose

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

Neither this document nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by the Company, or may resign for any reason at any time.

The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard

Conscientious Employee Protection Act (CEPA)

- New Jersey law prohibits the Company from taking any retaliatory action against employees because they:
 - Disclose, or threaten to disclose, to a supervisor or to a public body an activity, policy, or practice of the employer or another employer, with whom there is a business relationship, that the employee reasonably believes is in violation of a law, or a rule or regulation issued under the law, or, in the case of an employee who is a licensed or certified health care professional, reasonably believes constitutes improper quality of patient care.
 - Provide information to, or testify before, any public body conducting an investigation, hearing or inquiry into any violation of law, or a rule or regulation issued under the law by the employer or another employer, with whom there is a business relationship, or, in the case of an employee who is a licensed or certified health care professional, provide information to, or testify before, any public body conducting an investigation, hearing or inquiry into quality of patient care.
 - Provide information involving deception of or misrepresentation to, any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of the employer or any governmental entity.
 - Provide information regarding any perceived criminal or fraudulent activity, policy or practice of deception or misrepresentation which the employee reasonably believes may defraud any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of the employer or any governmental entity.
 - Object to, or refuse to participate in, any activity, policy or practice which the employee reasonably believes:
 - Is in violation of a law, or a rule or regulation issued under the law or, if the employee is a licensed or certified health care professional, constitutes improper quality of patient care.
 - Is fraudulent or criminal.
 - Is incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment.
 - The protection against retaliation, when a disclosure is made to a public body, does not apply unless the employee has brought the activity, policy or practice to the attention of his or her supervisor by written notice and given the Company a reasonable opportunity to correct the activity, policy or practice. However, disclosure is not required where the employee reasonably believes that the activity, policy or practice is known to one or more supervisors of the Company or where the employee fears physical harm as a result of the disclosure, provided that the situation is an emergency in nature.

Domestic Abuse, Sexual Assault, and Related Crimes Leave

- An employee may be eligible for up to 20 days of unpaid leave under the New Jersey Security and Financial Empowerment Act (NJ SAFE Act) during any 12-month period if the employee is the victim of domestic violence or sexually violent offense or if the employee's spouse, partner in a civil union, son, daughter, parent, parent-in-law, sibling, grandparent, grandchild, blood relative, or any individual with whom the employee can demonstrate a close association equivalent to that of a family member was the victim of such act. Leave may be taken for each incident of domestic violence and/or sexual violence.

- To be eligible, employees must have worked at least 1,000 hours in the 12-month period immediately preceding the leave. Further, employees must take the 20 days of unpaid leave within one year of the qualifying event.
- Employees may take time off to:
 - Seek medical attention for, or recovering from, physical or psychological injuries caused by the incident to the employee or a family member.
 - Obtain services from a victim services organization for the employee or a family member.
 - Obtain psychological or other counseling for the employee or a family member.
 - Participate in safety planning, temporarily or permanently relocating, or take other actions to increase the safety of the employee or a family member from future domestic or sexual violence or to ensure economic security.
 - Seek legal assistance or remedies to ensure the health and safety of the employee or a family member, including preparing for, or participating in, any civil or criminal legal proceeding related to or derived from domestic or sexual violence.
 - Attend, participate in, or prepare for a criminal or civil court proceeding relating to an incident of domestic or sexual violence of which the employee or a family member was a victim.
- If an employee requests leave for a reason covered by the NJ SAFE Act and the New Jersey Family Leave Act (NJFLA) or the federal Family and Medical Leave Act (FMLA), the leave counts simultaneously against his or her entitlement under each respective law. This will not conflict with any rights conferred by the NJFLA, New Jersey's Temporary Disability Benefits Law, or the FMLA.
- The Company will not rescind or reduce employment benefits accrued prior to the date on which leave is taken; or rescind or reduce employment benefits, unless the rescission or reduction is based on changes that would have occurred if the employee continued to work without taking leave.
- The Company will not threaten to or actually discharge, harass or otherwise discriminate or retaliate against an employee concerning compensation, terms, conditions or privileges of employment because he or she took or requested NJ SAFE Act leave or because he or she refused to authorize the release of confidential information.
- Employees may, but are not required, to substitute any accrued but unused paid time off.

Military Leave

- Members of the National Guard, naval militia, or armed forces reserves are entitled to up to three months of unpaid leave in a four-year period to attend assemblies, annual training, or armed forces service school. Upon return to work, the employee will be reinstated to his or her position with equivalent seniority, benefits, pay and other terms and conditions of employment.
- Employees must notify their direct supervisor as soon as possible after learning the intended dates upon which such leave will begin and end. Employees may, but are not required, to substitute any accrued but unused paid time off.

New Jersey Family Leave Act (NJFLA)

- Employees may be entitled to an unpaid leave of absence under the Family and Medical Leave Act (FMLA) and New Jersey Family Leave Act (NJFLA). This policy is intended to provide the employee with information concerning NJFLA entitlements. Whenever permitted by law, leave under the FMLA will run concurrently with NJFLA leave and any other leave provided under state or local law. Employees should also refer to the federal FMLA policy in addition to this policy.
 - Employees Eligible for NJFLA Leave
 - To be an NJFLA eligible employee, the employee must have been employed by the Company in New Jersey for at least 12 months; and worked at least 1,000 base hours during the 12-month period preceding the leave. Base hours mean the hours of work for which the employee receives compensation including overtime hours and hours for which the employee receives workers' compensation benefits.
 - Basic NJFLA Leave Entitlement
 - NJFLA provides employees with up to 12 workweeks of unpaid leave for certain family reasons during a 24-month period. The 12-month period is determined based on a rolling 12-month period measured backwards from the date the employee's leave will be taken. The total leave shall not exceed 12 weeks in any 24-month period except for leave to care for an injured service member which shall not exceed 26 weeks of leave during a single 12-month period.
- Leave may be taken for any one, or for a combination, of the following reasons:
 - To care for the employee's child, including a foster child, after birth, including by way of gestational carrier, or placement for adoption.
 - To care for the employee's spouse, partner in a civil union, son, daughter, parent, parent-in-law, sibling, grandparent, grandchild, blood relative, or any individual with whom the employee can demonstrate a close association equivalent to that of a family member who has a **serious health condition**.
 - For the employee's own **serious health condition** (including any period of incapacity due to pregnancy, prenatal medical care for childbirth) that makes him or her unable to perform one or more of the essential functions of the employee's job (FMLA only).
 - Because of any **qualifying exigency** arising out of the fact that the employee's spouse, son, daughter or parent is a covered military member on covered active duty or has been notified of an impending call or order to covered active duty status in the armed forces (FMLA only).

- If the Company employs both an employee and his or her spouse, they are together entitled to a total of 12 workweeks in 12 months for any leave taken for the birth, adoption, or placement of a child, or to care for a parent with a serious health condition. Similarly, they are together entitled to a total of 26 workweeks during the single 12-month period mentioned above for any leave taken to care for a covered service member.

Paid Sick Leave

- The Company's paid time off policy provides paid time off benefits sufficient to meet or exceed requirements of the New Jersey Paid Sick leave Act. Please contact the HR Director if there are questions.

Volunteer Emergency Responder Leave

- Employees may be eligible for time off work to serve as a volunteer emergency responder, firefighter, first-aid squad, rescue or ambulance squad, or member of any county or municipal volunteer Office of Emergency Management.
- Employees should contact their supervisor as soon as they are aware that they will be late to work, or unable to report to work due to the emergency dispatch. Upon request, the employee must provide his or her supervisor with a statement from the appropriate department/organization documenting that he or she was responding to an emergency call. Such time off will be unpaid for nonexempt employees. Exempt employees will be paid in accordance with federal and state wage and hour laws.

Lactation Breaks

- New Jersey Breastfeeding Law requires Company to provide reasonable breaks for mothers that are breastfeeding.
- Breastfeeding in New Jersey is protected up to one year after the birth of the child.
- The Company will compensate breastfeeding employees during the break time in the event that other employees are compensated for their breaks.
- Additionally, the Company will provide employees with a place to express and store milk in accordance with the law.

Drug Testing for Marijuana in New Jersey

- If an applicant or employee of the Company in New Jersey tests positive for marijuana as a result of a drug test required by the Company, the applicant or employee will be provided with the opportunity to present the HR Director with a legitimate medical explanation for the positive drug test result.

Last Updated 08/19/2020 11:48:26 ET



State Addendum – New York

Purpose

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

Neither this document nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by the Company, or may resign for any reason at any time.

The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard

Blood Donation Leave

- Employees who work an average of at least 20 hours per week are eligible for up to three hours of unpaid leave in any 12-month period for donating blood.
- Employees must provide at least three working days advance notice, except in emergency situations.
- Employees may use accrued paid time off for this purpose.

Bone Marrow Donor Leave

- Employees who work an average of at least 20 hours per week are eligible for an unpaid leave of absence to undergo a medical procedure to donate bone marrow.
- The combined length of leave is to be determined by the physician, but cannot exceed 24 work hours unless approved by the Company.
- Employees must submit verification by a physician for the purpose and length of each leave requested to donate bone marrow.
- Employees may use accrued paid time off for this purpose.

Crime Victims Leave

- Employees may take unpaid time off from work to comply with a subpoena to testify in a criminal proceeding (including time off to consult with the district attorney), to give a statement at a sentencing proceeding, victim impact statement at a pre-sentencing proceeding, or statement at a parole board hearing.
- An employee is eligible for time off if he or she is:
 - The victim of the crime at issue in the proceedings.
 - The victim's next of kin.
 - The victim's representative (a person who represents or stands in the place of another person, including but not limited to an agent, assignee, attorney, guardian, committee, conservator, partner, receiver, administrator, executor or heir, or a parent of a minor), if the victim is deceased as a result of the offense.
 - A "Good Samaritan" (i.e., a person who acts in good faith (a) to apprehend a person who has committed a crime in his or her presence; (b) to prevent a crime or an attempted crime from occurring, or (c) to aid a law enforcement officer in effecting and arrest).
 - Pursuing an application or enforcement of an order of protection as provided under relevant law.
- Employees may, but are not required, to substitute any accrued but unused paid time off.

New York State Paid Family Leave

- Subject to the requirements of this policy, employees generally become eligible for paid family leave benefits ("PFL") under the same terms as Family Medical Leave Act and consistent with the terms of the Company's Family Medical Leave Act policy, except that PFL is not available for an employee's own serious health condition or an employee's own qualifying military event. In addition, to be eligible for PFL, employees must meet one of the following criteria:

- The employee must work 20 or more hours per week for at least 26 consecutive work weeks¹; or
- If the employee works fewer than 20 hours per week, he or she must work at least 175 days over a 52 consecutive week period.
- Employees will be required to contribute 0.126% of their weekly wage, up to the annualized New York State Average Weekly Wage, as their contribution toward PFL benefits, unless they do not meet the employment eligibility criteria and submit an opt-out waiver form. To be clear, the following employees shall have the option of waving PFL benefits: (a) employees who work 20 or more hours per week, but will not work for 26 consecutive weeks, and (b) employees who work fewer than 20 hours per week, but will not work for 175 days in a 52 week period². Upon executing a waiver of PFL benefits, such time worked by the employee will not count toward the minimum employment and contribution required to be eligible for PFL benefits.

Concurrent Use of PFL and FMLA

- To the extent employees are eligible for both PFL and FMLA, they will be required to take PFL concurrently with their FMLA leave. Employees may be eligible for additional paid benefits beyond those provided by the Company's paid leave policies. Employees will all need to apply for such benefits. However, at no time will employees be eligible to receive more than 100% of their base salary, less withholdings and deductions. Please contact the HR Director for more information on the benefits that may be available.

Military Spouse Leave

- Employees may be eligible for up to 10 days of unpaid leave if their spouse is in the armed forces, National Guard, or reserves and deployed during a period of military combat, to a combat theater or zone of operations. To be eligible, employees must work an average of 20 or more hours per week.
- Employees may, but are not required, to substitute any accrued but unused paid time off.

Jury Duty Leave

- In addition to the Company's general Jury Duty Leave policy, should an employee be excused from jury service before the halfway point of his or her scheduled workday, the employee is required to contact the supervisor/manager to find out if he or she should report for work.
- Employees are entitled to be excused from work for the day or days they served as a juror. Employees must notify their supervisor prior to the commencement of a term of jury duty.

Meal Period

- Nonexempt employees will be provided with one meal period of 30 minutes in length each workday when six or more hours are worked that extend over the noonday meal period (11 a.m. to 2 p.m.). If an employee's shift begins before 11 a.m. and continues until after 7 p.m., he or she will be allowed an additional meal period of at least 20 minutes between 5 p.m. and 7 p.m. Every person employed for a period or shift of more than six hours, starting between 1 p.m. and 6 a.m., will be allowed at least a 45-minute meal period, taken midway between the beginning and end of the shift.
- Supervisor/managers will schedule meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time if the meal period is more than 20 minutes.
- Failure to return on time from breaks or lunch may subject an employee to disciplinary actions, up to and including termination from employment.

Lactation Breaks

- The Company shall provide reasonable unpaid break time or permit employees to use paid break time or meal time each day to allow them to express breast milk for their nursing children for up to three years following childbirth.
- The Company shall make reasonable efforts to provide a room or other location, in close proximity to the work area, where an employee can express milk in privacy.
- The Company will not discriminate in any way against employees for choosing to express breast milk in the workplace.

Pay Transparency

- Employees are not prohibited from, and will not be discharged or discriminated against for inquiring about, discussing or disclosing their own pay. Employees are not prohibited from inquiring about, discussing or disclosing the pay of another employee so long as they have the other employee's permission to do so. However, if an employee has access to the compensation information of other employees or applicants as a part of his or her essential job functions, the employee 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 Company. This policy in no way requires an employee to disclose his or her wages to another employee or another party.

Volunteer Emergency Responder Leave

- Employees may be eligible for time off work to serve as a volunteer firefighter or ambulance service. The employees should contact their supervisor as soon as they are aware that they will be late to work, or unable to report to work due to the emergency dispatch. Upon request, employees must provide their supervisor with a statement from the appropriate

department/organization documenting that they were responding to an emergency call. Such time off will be unpaid for nonexempt employees. Exempt employees will be paid in accordance with federal and state wage and hour laws.

Voting Leave

- The Company encourages employees to exercise their voting privileges in local, state, and national elections. However, since the polls are open for long periods, employees are encouraged to vote before or after regular working hours. If an employee's work schedule interferes with open polling hours, he or she may be eligible to take up to two hours of paid time off from work to vote. Exempt employees may be provided time off with pay when necessary to comply with federal and state wage and hour laws.

All Unlawful Harassment Prohibited

- The Company strictly prohibits and does not tolerate unlawful harassment and discrimination against employees, interns or any other covered persons because of race, color, religion, creed, national origin, ancestry, sex, gender (including gender nonconformity and status as a transgender or transsexual individual), age, sexual orientation (including actual or perceived heterosexuality, homosexuality, bisexuality, and asexuality), physical or mental disability (including gender dysphoria and similar gender-related conditions), citizenship, genetic information or predisposing genetic characteristics, marital status, familial status, domestic violence victim status, military status, including past, current, or prospective service in the uniformed services, or any other characteristic protected under applicable federal, New York, or local law.

Sexual Harassment

- The Company strictly prohibits the harassment of employees, interns, independent contractors, other non-employees, or any other covered person based on that individual's sex, sexual orientation or gender, including pregnancy and status as a transgender or transsexual individual, and regardless of the harasser's sex or gender. Please consult the [Sexual Harassment Prevention](#) policy for more information.

New York City Paid Safe and Sick Leave

- The Company's paid time off policy provides paid time off benefits sufficient to meet or exceed the requirements of the New York City Paid Safe and Sick Leave Law. Please contact the HR Director with any questions.

Procedure

Harassment Complaint Procedure

1. If you are subjected to any conduct that you believe violates the Company's harassment policy or witness any such conduct, you must promptly speak to, write, or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, the HR Director, or the Senior Vice President of Operations. If you have not received a satisfactory response after reporting any incident that you perceive to be harassment, please immediately contact the HR Director. The Company will ensure that a prompt investigation is conducted. For details regarding the complaint and investigatory process, please consult the "Complaint Procedure" and "Investigations" sections of this Handbook.
2. Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. The Company will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take prompt corrective action, if appropriate.
3. Additionally, any manager or supervisor who observes harassing conduct must report the conduct to the HR Director so that an investigation can be made and corrective action taken, if appropriate. Failure to do so may result in discipline, up to and including termination of employment.
4. Aside from the internal process at the Company, which we hope employees will use so that the Company can take prompt remedial action, employees may also choose to pursue legal remedies with the following government entities:
 - a. **New York State Division of Human Rights (DHR)** - A complaint alleging violation of the Human Rights Law may be filed either with 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, within three years of the alleged discrimination. Complaining internally 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 main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400, www.dhr.ny.gov.
 - b. **United States Equal Employment Opportunity Commission (EEOC)** - 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 a 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. If an employee believes that he or she has been discriminated against at work, he or she 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 (1-800-669-6820 (TTY)), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

- c. **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.
- d. **Contact the Local Police Department** - If the harassment involves physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crim. Contact the local police department.

Footnotes

- ¹ Time spent using paid time off will be counted towards this employment eligibility requirement.
- ² Within eight weeks after any change in an employee's regular work schedule that would require an employee to work for 26 consecutive weeks or 175 days in a 52 consecutive week period, any waiver previously filed shall be deemed as revoked and the contributions (including any retroactive amounts due from date of hire) shall be assessed.

Last Updated 09/02/2021 11:33:41 ET

**State Addendum – Pennsylvania****Purpose**

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

Neither this document nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by the Company, or may resign for any reason at any time.

The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard**Crime Victims Leave**

- Employees may take unpaid time off from work to comply with a subpoena or other court order, to serve as a witness in a criminal proceeding, or to attend a criminal proceeding.
- Employees are eligible for time off if they are any of the following:
 - The victim of the crime at issue in the proceedings
 - Related to the victim within the third degree of consanguinity or affinity
 - In a common-law relationship with the victim
 - Residing in the same household with the victim
- Employees may, but are not required, to substitute any accrued but unused paid time off.
- If the employee is the alleged offender, they are not eligible for time off.

Failure to Report During State of Emergency

- If the roads are closed because the Governor declared a state of emergency, employees are not required to come to work.
- Employees cannot be disciplined or terminated for failing to report to work because of a road closure in the county where the employee lives or works.

Volunteer Emergency Responder Leave

- Employees may be eligible for time off work to serve as a volunteer firefighter, fire police, rescue squad, or member of an ambulance service.
- If an employee will be late to work, or unable to report to work due to the emergency dispatch, they should contact their supervisor as soon as possible.
- Upon request, employees must provide their supervisor with a statement from the appropriate department/organization documenting the need for the leave.
- Such time off will be unpaid for nonexempt employees. Exempt employees will be paid in accordance with federal and state wage and hour laws.

Philadelphia Promoting Healthy Families and Workplaces Law

- The Company's paid time off policy meets or exceeds the requirements of the Philadelphia Promoting Healthy Families and Workplaces Law.
- Please contact the HR Director for any questions.

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**Purpose**

This state addendum supplements the Company's handbook dated February 2020. It is intended to be used in conjunction with the Company's Handbook. In the case where a state policy is more generous than its federal counterpart contained in the Company's Handbook, the more generous policy will govern. It is not always possible for all state and local laws to be reflected in this Handbook. However, the Company will comply with all applicable laws.

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The Company reserves the right to revise, supplement, or rescind any policies or portion of the Handbook and/or Addendums as it deems appropriate, in its sole and absolute discretion, except to the extent that provisions in the Handbook are mandated by law or regulation. The Company will make its best efforts to inform employees of any changes as they occur. Changes will be effective on the dates determined by the Company, and after those dates all superseded policies will be void.

Standard**Crime Victims Leave**

- Employees may take unpaid time off from work to be present at all criminal proceedings involving a crime against the victim at which a victim has the right or opportunity to appear.
- Employees are eligible for time off if they:
 - Have suffered physical, psychological or economic harm as a direct result of the commission of a felony, assault and battery, maiming or driving while intoxicated
 - Have suffered physical, psychological or economic harm as a direct result of the commission of stalking, sexual battery, or attempted sexual battery
 - Are the spouse or child of the victim
 - Are the victim's parent or legal guardian if the victim is a minor
 - If the victim is physically or mentally incapacitated or was a homicide victim and the employee is the victim's spouse, parent, sibling, or legal guardian
- Employees may, but are not required, to substitute any accrued but unused paid time off.
- Employees are not eligible for leave if they are the person who committed the crime.

Election Duty Leave

- Employees who serve as an election official are granted unpaid leave in order to perform the duties of the appointed position.
- Employees must provide reasonable advance notice of the dates of the required service.
 - If service is for four or more hours, including travel time, employees will not be required to start any shift that begins on or after 5 p.m. on the day of service or begins before 3 a.m. on the day following election official service.

Jury Duty and Court Attendance Leave

- In addition to the Company's general Time Off – Jury and Witness Duty policy, employees may be absent if summoned for jury duty, subpoenaed to appear in court when a case is to be heard, or required in writing to appear at any future hearing.
- Employees will not be penalized, terminated, or disciplined based on taking this leave.
- If service is for four or more hours, including travel time, employees will not be required to start any shift that begins on or after 5 p.m. on the day of service or begins before 3 a.m. on the day following jury duty.

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