

Needham Risk Management Resource Group, LLC

Employee Handbook
Revised December 17, 2025

1955 Ferndale Road, Castleton-on-Hudson NY 12033

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1 Section 1

1.1 Introduction

Needham Risk Management Resource Group, LLC (hereafter known as "Needham Risk Management" or "the Company"), was formed in 2003 and offers a full spectrum of industrial hygiene, health and safety and risk management services to both private and public sector employees.

We have a committed and dynamic workforce. Our staff of dedicated and talented individuals prides themselves on providing the top level of service that our clients deserve. We hope that your employment with the company will be enjoyable and rewarding. We would also like to say thank you for joining us.

1.2 Important information about this handbook

This handbook is provided to you as a summary of our policies and practices. While we have taken measures to include the information you need to know, it is not the intent of this handbook to cover every possible situation or question that could occur. If at any time you have some questions regarding the content of the handbook or about something not addressed in the handbook, please ask the General Manager.

1.3 This handbook is not a contract

There is nothing in this handbook nor in any other communication by a representative of management, whether oral or written, that is in any way intended to create a contract of employment, express or implied, or as a promise of treatment in any particular situation. The company does not enter into contracts of employment with regular full-time and regular part-time employees. Any information outlined in this handbook or in any other company document does not modify the employment at will policy and should not be interpreted to mean that termination will occur only for "just cause".

1.4 Employment at Will

Needham Risk Management is an "at will" employer, which means employment is voluntarily entered into. You are free to resign at any time and the company may terminate your employment at any time and for any reason, with or without notice.

1.5 Equal Opportunity

Needham Risk Management is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, pregnancy-related conditions, and lactation), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances. The company's management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs, and general treatment during employment.

Pay discrimination between employees of the opposite sex performing substantially similar work, as defined by state and federal law, is prohibited. Pay differentials may be valid in certain situations defined by law. Employees will not be retaliated against for inquiring about or discussing wages. However, the company is not obligated to disclose the wages of other employees.

All personnel actions such as compensation, benefits, company-sponsored training, apprenticeships, internships, volunteer opportunities, transfer, demotion, termination, layoff, and return from layoff, shall be administered without regard to any protected characteristic stated under federal, state, or local laws.

In addition, the company has numerous policies that are designed to achieve important General objectives. We recognize, however, that an otherwise legitimate workplace policy can have unintended consequences to individuals in a particular group or class. If you feel that one of our policies adversely impacts you, you should report your issue(s) regarding the particular policy to a member of the management team.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of a member of management. Needham Risk Management will not allow any form of retaliation against employees who raise issues of equal employment opportunity. If employees feel they have been subjected to any such retaliation, they should contact Michael Needham, owner of Needham Risk Management. To ensure the workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations conducted pursuant to this policy.

1.6 Pregnancy Accommodations

In compliance with New York law, Needham Risk Management will not discriminate against employees in relation to pregnancy, childbirth or related conditions and will endeavor to provide reasonable accommodations for any pregnancy-related conditions, unless doing so would impose an undue hardship on the operation of the company's General Manager.

Reasonable accommodations that may be provided include:

1. occasional breaks to rest or drink water;
2. a modified work schedule;
3. leave for related medical needs;
4. available light duty assignments; and
5. transfers away from hazardous duty.

The employee must cooperate in providing medical or other information that is necessary to verify the existence of the pregnancy-related condition or that is necessary for consideration of the accommodation. Such medical information will be kept confidential by the company.

The company will not require any employee to take leave because the employee is pregnant. If the employee takes medical leave due to a pregnancy-related condition or childbirth, the company will

hold the employee's job for the employee as long as the company does for employees who take medical leave for other reasons.

The company will not retaliate against any employee because the employee is pregnant or may become pregnant or change the terms, conditions and privileges of employment because of pregnancy, childbirth or related conditions. The company also will not refuse to hire or to promote a candidate because the individual is pregnant or may become pregnant.

Employees with questions or concerns regarding this policy or who would like to request a reasonable accommodation pursuant to this policy should contact the General Manager.

1.7 Reproductive Health Decision Making Discrimination

Needham Risk Management may not:

- discriminate or take any retaliatory personnel action against employees with respect to compensation, terms, conditions or privileges of employment because of, or on the basis of, the employee's or dependent's reproductive health decision making, including but not limited to a decision to use or access a particular drug, device or medical service; or
- require employees to sign a waiver or other document that purports to deny employees the right to make their own reproductive health care decisions, including use of a particular drug, device, or medical service.

The company also may not access the employee's personal information regarding the employee's or the dependent's reproductive health decision making, including but not limited to the decision to use or access a particular drug, device, or medical service without the employee's prior informed affirmative written consent.

Employees may bring a civil action in any court of competent jurisdiction against the company for any alleged violations of this policy. In any civil action alleging a violation of this policy, the court may: award damages, including, but not limited to, back pay, benefits and reasonable attorneys' fees and costs incurred to a prevailing plaintiff; afford injunctive relief against the company if it commits or proposes to commit a violation of the provisions of this policy; order reinstatement; and/or award liquidated damages equal to 100 percent of the award for damages unless the company proves a good faith basis to believe that its actions in violation of this policy were in compliance with the law.

Any act of retaliation for employees exercising any rights granted under this policy shall subject the company to separate civil penalties. For the purposes of this policy, retaliation or retaliatory personnel action means discharging, suspending, demoting or otherwise penalizing employees for: making or threatening to make a complaint to the company, co-worker or to a public body, that rights guaranteed under this policy have been violated; causing to be instituted any proceeding under or related to this policy; or providing information to or testifying before any public body conducting an investigation, hearing or inquiry into any such violation of a law, rule or regulation by the company.

Employees with issues or concerns regarding this policy or who feel they have been subjected to any alleged violation of this policy should contact the General Manager.

1.8 Genetic Information Non-Discrimination (Gina) Policy

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits covered employers from requesting or requiring genetic information of an individual or an individual's family member, except as specifically allowed by this law. To comply with GINA, the company asks that employees not

provide any genetic information when responding to a request for medical information for purposes of leaves of absence or otherwise.

“Genetic information” as defined by GINA, includes an individual’s family medical history, the results of an individual’s or family member’s genetic tests, the fact that an individual or an individual’s family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services. If you have any questions about the information to be provided, please contact the General Manager.

1.9 Immigration Law Compliance

In accordance with the Immigration Reform and Control Act of 1986 (IRCA), the company only employs individuals who are legally authorized to work in the United States. Furthermore, the company does not continue to employ any individual whose legal right to work in the United States has been terminated.

The Form I-9 is used to verify an individual’s identity and employment eligibility. You must complete the form and provide the required documentation supporting your identity and employment eligibility before you begin working.

1.10 Background Checks

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

All offers of employment are conditioned on receipt of a background check report that is acceptable to the company. All background checks are conducted in conformity with the Federal Fair Credit Reporting Act, the Americans with Disabilities Act, and state and federal privacy and antidiscrimination laws. Reports are kept confidential and are only viewed by individuals involved in the hiring process.

If information obtained in a background check would lead the company to deny employment, a copy of the report will be provided to the applicant, and the applicant will have the opportunity to dispute the report’s accuracy. Background checks may include a criminal record check, although a criminal conviction does not automatically bar an applicant from employment.

The company complies with Article 23-a of New York State Labor Law in considering employment of individuals who have a previous criminal conviction. In making a determination the following factors shall be considered:

- The public policy of this state, as expressed in Article 23-a, is to encourage the employment of persons previously convicted of one or more criminal offenses.
- The specific duties and responsibilities necessarily related to the employment sought or held by the person.
- The bearing, if any, the criminal offense or offenses for which the person was previously convicted will have on his fitness or ability to perform one or more such duties or responsibilities.
- The time which has elapsed since the occurrence of the criminal offense or offenses.
- The age of the person at the time of occurrence of the criminal offense or offenses.
- The seriousness of the offense or offenses.
- Any information produced by the person, or produced on his behalf, in regard to his rehabilitation and good conduct.
- The legitimate interest of the employer in protecting property, and the safety and welfare of specific individuals or the general public.

In making a determination, the company shall also give consideration to a certificate of relief from disabilities, or a certificate of good conduct issued to the applicant, which certificate shall create a presumption of rehabilitation in regard to the offense or offenses specified therein.

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

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

A verification of an applicant's past work performance, which is gained through phone contacts of past supervisors and/or co-workers will be conducted by the General Manager and/or the supervisor for the position and is not subject to the requirements of the Fair Credit Reporting Act.

1.11 National Labor Relations

Nothing in this Employee Handbook is intended to unlawfully restrict an employee's right to engage in any of the rights guaranteed them by Section 7 of the National Labor Relations Act, including but not limited to, the right to engage in concerted protected activity for the purposes of their mutual aid and/or protection. Nothing in this Employee Handbook will be interpreted, applied or enforced to interfere with, restrain or coerce employees in the exercise of Section 7 rights.

1.12 Handbook Modifications

The terms and policies contained in this manual are subject to change at the sole discretion of the management of Needham Risk Management. Management may change any provision in this manual unilaterally at any time. No department head, supervisor or individual is authorized to change any

provision in this manual without prior approval from the Principal of the Company or General Manager.

When changes to this manual occur, reasonable efforts will be made to distribute written changes to all employees. Employees are required to sign the attached certification acknowledging receipt of the policy and return the completed acknowledgement to the General Manager.

It is understood that any policy change is effective as of the date designated by management and replaces any previous policy.

The language contained in this manual shall not be construed so as to give any employee the right or guarantee of continuous employment.

2 Section 2- Employment Policies and Procedures

2.1 Employment Classification

2.2 Introductory Period

If you are a new employee, the first three months of your employment is considered an introductory period. This period is intended to give you an opportunity to demonstrate your skills and abilities and to achieve a satisfactory performance level in your new job. During this period, or at any time thereafter, you may be given different tasks or responsibilities. You and the General Manager will discuss your performance during, and/or near the end of the introductory period.

Sometimes the company finds that an individual does not possess the required knowledge or skills to perform the job, is unable to adapt to the work, or is not conforming to prescribed standards of performance. The company reserves the right to terminate an individual's employment at any time during the introductory period, or after its completion in accordance with the at-will provisions.

2.3 Employee Classifications

Regular Full-Time is an employee who is regularly scheduled to work forty (40) or more hours per week. Regular full-time employees may be either non-exempt (hourly) or exempt (salaried) employees.

Regular Part-time is an employee who is scheduled to work less than forty (40) hours per week. Part-time employees are non-exempt (hourly) employees.

Contract Employee is an employee who is hired for a certain length of time, or specific job function, is paid for only their hours worked and is subject to an employment contract. A contract employee will not be eligible to receive any benefits, paid holidays or paid time off.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay; they generally receive the same weekly salary regardless of hours worked. Such salary may be paid less frequently than weekly. The employee will be informed of these classifications upon hire and informed of any subsequent changes to the classifications.

2.4 Outside Employment

Needham Risk Management considers itself to be your primary employer. Employees who wish to engage in other employment may do so, so long as the secondary employment does not impact the work or scheduling of Needham Risk Management's business. If a conflict arises, Needham Risk Management will expect to take precedence. During employment with the company, no employee is permitted to take a second position whether considered temporary, seasonal or otherwise, with a competitor of Needham Risk Management.

2.5 Hire Date

The first day that you report to work is your official hire date. This date is used to compute various conditions and benefits as described in this handbook and other company policies and procedures. Temporary employees or employees who work for employment agencies are not provided with an official hire date.

2.6 Personal Information

Your personnel file contains information that you provide to us, including your application, resume, and personal information required for payroll purposes. We place a great deal of importance on the accuracy and truthfulness of this information. Anyone who is found to falsify, omit, or misrepresent information may be excluded from employment consideration, or if already employed, may be discharged from employment.

It is your responsibility to keep us informed of updates to your personal information so that we can keep our files up to date. Please notify us immediately when there is a change in your name, marital status, home address and/or telephone number, emergency contact, or a change in dependents.

While you are an employee of Needham Risk Management, we may receive requests for, or verification of, information about you from entities with whom you may be conducting personal business (such as a mortgage company), or from the authorities. We will respond to such inquiries only when we have your permission to do so, unless we are otherwise required to respond by law. Managers and Supervisors, other than the General Manager may only have access to personnel file information on a need-to-know basis. Current employees may review their personnel file within three days of making such a request. Personnel files are to be reviewed in the General Manager's office and may not be removed. A reasonable amount per page will be charged for copies of information from your file if requested.

Former employees are not permitted access to their files.

2.7 Working Time

Employees are generally scheduled to work a specified number of hours each work week. However, the company cannot guarantee a particular number of hours of work, the specific days of the work week, or the shift schedule. The company reserves the right to modify or change work hours, days, and/or shifts.

Our regular business hours for field and office personnel are generally between 8:00 a.m. to 4:30 p.m. subject to scheduling needs. We expect employees to arrive before the start of their regularly scheduled shift, so they are ready to start at the beginning of their assigned shift. Arrival after the scheduled start time is considered "tardy". Excessive tardiness may result in disciplinary action up to and including termination. Employees who are going to be late should text or call the General Manager immediately.

The scheduled workweek begins Sunday and ends the following Saturday. Employees are required to take a $\frac{1}{2}$ hour unpaid lunch at times which are flexible and dependent on work currently in process. Scheduling of your lunch period should be discussed with the General Manager. Employees who work through their lunch period are required to report this on the daily timesheet. Continued and repeated working through lunch without authorization from the General Manager may lead to disciplinary action.

2.8 Timekeeping

We are required to keep accurate records of time worked by each employee for the purposes of complying with wage and hour laws. If you are a non-exempt employee, your time worked every day must be accurately recorded. Additionally, we require that you keep an accurate record of any time away from work including vacations, bereavement, or sick time.

Employees are responsible for keeping attendance records and submitting these records bi-weekly. If attendance records are not submitted for specific days in the appropriate timeframe, it will be assumed that the employee did not work those dates and the employee will not be paid for any hours worked on those dates. On receipt of the appropriate timesheets, adjustments will be made to the employee's payroll in the following pay period. Any employee who repeatedly fails to turn in time sheets in a timely manner may be subject to disciplinary action.

2.9 Pay Periods

Employees will be paid bi-weekly for all the time worked during the past pay period.

Paychecks are issued on Friday for the previous work period. Any changes that affect payroll must be appropriately completed and handed in by Monday morning of the payroll week. Adjustments for late changes/amendments will be made in the following pay period.

Please review your paycheck for errors. If you find a mistake, report it immediately.

Payroll stubs itemize deductions made from gross earnings. By law, Needham Risk Management is required to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also may include any court-ordered garnishments. Payroll stubs will also differentiate between regular pay received and overtime pay received.

Paychecks will be given only to the employee, unless the employee requests that they be mailed or authorizes in writing that another person may accept the check.

It is Needham Risk Management's policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure proper payment and that no improper deductions are made, employees must review pay stubs promptly to identify and report all errors.

If employees believe they have been subject to any improper deductions, they should immediately report the matter to the General Manager. If the General Manager is unavailable or if the employee believes it would be inappropriate to contact that person (or if the employee has not received a prompt and fully acceptable reply), they should immediately contact the Principal of the company.

2.10 Safe Harbor Policy For Exempt Employees

Those classified as exempt salaried employees will receive a salary which is intended to compensate them for all hours they may work for Needham Risk Management. This salary will be established at the time of hire or classification as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work performed.

Under federal and state law, salary is subject to certain deductions. For example, unless state law requires otherwise, salary can be reduced for the following reasons:

- full-day absences for personal reasons;
- full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing wage replacement benefits for such absences (deductions also may be made for the exempt employee's full-day absences due to sickness or disability before the employee has qualified for the plan, policy or practice or after the employee has exhausted the leave allowance under the plan);
- full-day disciplinary suspensions for infractions of our written policies and procedures;
- Family and Medical Leave Act absences (either full- or partial-day absences);
- to offset amounts received as payment from the court for jury and witness fees or from the military as military pay;
- the first or last week of employment in the event the employee works less than a full week; and
- any full work week in which the employee does not perform any work.

Salary may also be reduced for certain types of deductions such as a portion of health, dental or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a 401(k) or pension plan.

In any work week in which the employee performed any work, salary will not be reduced for any of the following reasons:

- partial day absences for personal reasons, sickness, or disability;
- an absence because the company has decided to close a facility on a scheduled work day;

- absences for jury duty, attendance as a witness, or military leave in any week in which the employee performed any work (subject to any offsets as set forth above); and
- any other deductions prohibited by state or federal law.

However, unless state law provides otherwise, deductions may be made to accrued leave for full- or partial-day absences for personal reasons, sickness, or disability.

2.11 Direct Deposit

Needham Risk Management strongly encourages employees to use direct deposit. Authorization forms are available from the General Manager.

2.12 Overtime

If you are an hourly employee and work more than 40 hours in a week, you are eligible for overtime pay for the hours worked in excess of 40 in a workweek. Only hours actually worked are calculated for the payment of overtime. Holiday, paid time off, and other paid time off hours are not included as time worked when calculating overtime hours. The General Manager must approve all overtime.

2.13 Travel

Overnight, Out-of-Town Trips

Non-exempt employees will be compensated for time spent traveling (except for meal periods) during their normal working hours, on days they are scheduled to work and on unscheduled workdays (such as weekends). Non-exempt employees also will be paid for any time spent performing job duties during otherwise non-compensable travel time; however, such work should be limited absent advance management authorization.

Out-of-Town Trips for One Day

Non-exempt employees who travel out of town for a one-day assignment will be paid for all travel time, except for, among other things: time spent traveling between the employee's home and the local railroad, bus or plane terminal; and meal periods.

Local Travel

Non-exempt employees will be compensated for time spent traveling from one job site to another job site during a workday. The trip home, however, is non-compensable when the employee goes directly home from the final job site, unless it is much longer than the regular commute home from the regular worksite. In such a case, the portion of the trip home in excess of the regular commute is compensable.

Commuting Time

Under the Portal-to-Portal Act, travel from home to work and from work to home is generally non-compensable. However, if a non-exempt employee regularly reports to a worksite near their home but is required to report to a worksite farther away than the regular worksite, the additional time spent traveling is compensable.

If compensable travel time results in more than 40 hours worked by a non-exempt employee, the employee will be compensated at an overtime rate of one and one-half (1-1/2) times the regular rate.

To the extent that applicable state law provides greater benefits, state law applies.

2.14 Training and Employee Responsibility

You will be paid for training class attendance for the duration of the training class for a given day in accordance with the travel time procedures listed above. Although the company may pay for the classes, your training certifications are your responsibility to maintain. Failure to maintain any required certifications and licenses may result in your inability to work until such certifications and/or licenses are renewed.

Periodically, the company may financially support employees in achieving training programs, educational programs, license, or certification. If the employee leaves employment voluntarily within 6 months of completing a training, educational or licensing program paid for by the company, employees are required to reimburse the company for 75% of the expenses paid by the company. Any training materials the company owns or has paid for, must be signed out by the General Manager before leaving the premises. Upon completion of the certification or training program, materials will be promptly returned to the Company.

2.15 Garnishments

When an employee's wages are garnished by a court order, the company is legally bound to withhold the amount indicated in the garnishment order from the employee's paycheck. The company will honor applicable federal and state guidelines that protect a certain amount of an employee's income from being subject to garnishment.

2.16 Salary Advances

Needham Risk Management does not permit advances on paychecks or against accrued paid time off.

2.17 Discretionary Bonus

At times Needham Risk Management pays a discretionary bonus to employees. It is not intended to make up for or add to an employee's regular hourly wage or compensation for meeting the minimum standards of the job position. It is at the sole and total discretion of management whether there is any bonus, the amount, timing, and whether individual employees are rewarded. It should not be assumed that past payments have established a pattern for future payments. In other words, there is no guarantee of any bonus.

2.18 Attendance and Punctuality

Your co-workers depend on your being at work on time. Without this commitment from everyone, team members must change their schedules to make up for someone else's absence or tardiness. Therefore, you are expected to be reliable and punctual in arriving to work, to work your entire scheduled day and not to leave before the end of your scheduled shift or regular workday.

We recognize that you may experience an illness or personal emergency that requires time away from your job. When this occurs, you must notify the General Manager as soon as possible. A pattern of absences or repeated late arrivals to work may lead to disciplinary action and if not corrected as requested by the company, may result in further consequences, up to and including termination of employment.

Routine appointments (doctors, personal, etc.,) should be scheduled at the beginning or end of the day to minimize inconvenience and disruption to the work schedule. Employees should provide at least fourteen (14) days notice of scheduled, routine appointments to the General Manager.

The company is committed to establishing and maintaining work schedules on a fair and consistent basis and providing opportunities for the employee and the General Manager to jointly manage attendance.

Events that are not considered an unscheduled absence are:

Authorized bereavement leaves, military leave and civic responsibility leave (jury duty).

- Other leaves of absence or time off approved by the General Manager or direct Supervisor such as attendance at seminars, workshops, etc. Time off covered by Worker's Compensation Policy is not chargeable under this policy for disciplinary action purposes.

Expectations of Employees

Employees are expected to be on time, dressed appropriately and ready for work at their work location, at the start of their assigned shift.

- Employees are expected to notify the General Manager when he or she will be absent due to illness or other unexpected reasons. The notification should be no later than one (1) hour before the start of the shift unless proper excuse is presented for his or her inability to call or text. If the General Manager cannot be reached, the employee should work up the chain of command. Failure to comply with company procedures may be cause for denial of Paid Time-Off (PTO) and administration of disciplinary action.
- If the absence is to continue beyond the first day, the employee must notify their immediate supervisor on a daily basis unless otherwise arranged. Absence for three consecutive workdays without notification is considered a voluntary termination.
- Employees who have not worked because of personal illness for more than three (3) consecutive days may need to provide a doctor's note to the General Manager, along with a return to work slip.

Expectations of Managers

The General Manager is responsible for maintaining optimal attendance and the resolution of absenteeism. The General Manager is responsible for the following:

- Notifying employees of what the rules are regarding expected attendance in advance and keeping accurate records of all disciplinary notices to employees;
- Monitoring those expectations outlined above, and assuring adequate employee counseling and/or discipline when warranted; and, developing and maintaining work schedules to meet the needs of the Company while ensuring that the needs of the employee and work duties are balanced.

2.19 Employee Benefits Plans

References to employee benefits plans in this handbook are summaries only and the plans are governed by the plan documents. Employees should refer to the actual plans to obtain details with respect to any benefit.

2.20 Benefits Overview

In addition to good working conditions and competitive pay, it is Needham Risk Management's policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits include time-off benefits, such as vacations and holidays, and insurance and other plan benefits. We are constantly studying and evaluating our benefits programs and policies to better meet present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

The next few pages contain a brief outline of the benefits programs Needham Risk Management provides employees and their families. Of course, the information presented here is intended to serve only as guidelines.

The descriptions of the insurance and other plan benefits merely highlight certain aspects of the applicable plans for general information only. The details of those plans are spelled out in the official plan documents, which are available for review upon request from the Director, Administrative Services. Additionally, the provisions of the plans, including eligibility and benefits provisions, are summarized in the summary plan descriptions ("SPDs") for the plans (which may be revised from time to time). In the determination of benefits and all other matters under each plan, the terms of the official plan documents shall govern over the language of any descriptions of the plans, including the SPDs and this handbook.

Further, Needham Risk Management (Managers who are responsible for administering the plans) retains full discretionary authority to interpret the terms of the plans, as well as full discretionary authority with regard to administrative matters arising in connection with the plans and all issues concerning benefit terms, eligibility and entitlement.

While the company intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If employees have any questions regarding benefits, they should contact the General Manager.

2.21 Paid Time-Off (PTO)

Needham Risk Management appreciates how hard employees work and recognizes the importance of providing time for rest and relaxation. Needham Risk Management fully encourages employees to get this rest by taking paid time off. Time off under this policy includes extended time off, such as for a vacation, and incidental time due to sickness or to handle personal affairs.

The company provides a Paid Time Off (PTO) time bank for eligible full and part-time employees. This time benefit is used for:

- Scheduled vacation
- Illness
- Scheduled time for personal business
- Disability waiting period
- Waiting period for Workers' Compensation
- Substitution for paid family leave

Paid Time Off is made up of accrued hours worked.

New employees begin accruing PTO effective from their date of hire.

Hourly/Non-Exempt Accrual Rates: PTO accrual rates are based on hours worked per week and length of service as listed below. Paid Time Off does not accrue on overtime hours worked.

Employees earn Paid Time-Off (PTO) based on length of service. All anniversary dates for PTO are based on the employees anniversary date.

Salaried Employees

| Length of Service? | PTO Accrual Rate | PTO days/hours available to roll-over |
|--------------------|------------------|---------------------------------------|
| 0-5 years | 96 hours/year | 48 hours |
| >5 years | 136 hours/year | 68 hours |

Hourly Employees

| Length of Service? | PTO Accrual Rate | Maximum PTO Accrual Limit / year | PTO days/hours available to roll-over |
|--------------------|------------------|----------------------------------|---------------------------------------|
| 0-5 years | .047/Hour worked | 136 | 5 days/48 hours |
| >5 years | .066/Hour worked | 176 | 7.5 days/68 hours |

Employees with 5 years or less of service earn ten (12) PTO days (96 hours) on July 1st of each year. Employees with more than 5 years of service earn fifteen (17) PTO days (136 hours) on July 1st of each year. PTO hours can be used in any manner the employee chooses.

While the company encourages its employees to use their PTO, we recognize that due to staffing and work commitments that this may not always be possible. Employees will be permitted to roll-over one half of PTO hours earned in a year if the full amount is not used by the roll-over date of July 1st. The Company recommends that employees maintain a minimum balance of 20 hours to allow for unscheduled and unplanned absences, such as illness.

If you wish to use PTO, you must submit a request to the General Manager for approval. All requests should be submitted to the General Manager two (2) weeks in advance. Approval will be granted on a first come, first served basis to avoid multiple employee leaves during peak periods.

Conditions for Using PTO

To ensure adequate staffing in all departments, the following conditions apply to employee use of PTO:

- PTO must be scheduled in advance with General Manager approval.
- Employees reporting for work late or leaving work early will be charged PTO.
- PTO may be used to care for the illness or medical needs of the employee or a member of their immediate family (spouse, child, stepchild, sibling, or parent) in accordance with the rules and requirements of Family Medical Leave and Paid Family Leave as applicable.
- Employees are required to comply with the call-in procedure when utilizing PTO in the event of illness (refer to "Attendance" policy).
- PTO will not be available to use until the employee's 90-day introductory period has been successfully completed.
- Employees are not allowed to take unpaid leave time if PTO accruals are available (i.e., an employee may not take a week of vacation without pay in order to save PTO accruals for an absence at a later date).

PTO Payout Upon Separation

Unused PTO will be paid out upon separation of service provided that the following conditions are met:

- Submission of proper notice of resignation as specified in the policy on "Resignations" – in most cases this is a minimum of two weeks. The employee is required to work as scheduled for the duration of the period of notice.
- Once a notice of resignation is submitted, no PTO may be scheduled or used except with the approval of the General Manager.

Unused PTO will not be paid out in the event that an employee is terminated for a violation of any of the policies contained within this handbook or behaviors inconsistent with the mission and core values of Needham Risk Management.

2.22 Holidays

The company observes the following holidays:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- The Friday after Thanksgiving
- Christmas Day
- The Monday after Superbowl Sunday

Full time exempt (salaried) and non-exempt (hourly) employees are eligible for holiday pay. Non-exempt employees who have worked for the company for less than 3 months (i.e. are still in the Introductory Period) may not be eligible for holiday pay.

Part-time employees are eligible for holiday pay if it falls on one of their regularly scheduled work days.

Holiday pay is paid based on an 8-hour day. To receive benefits, an employee must work his/her full scheduled shift immediately before and after the holiday unless prior approval has been given by the General Manager. If the workload does not permit an employee to take off the holiday, another day off will be substituted.

Part-Time Employees: An employee who works less than 37.5 hours per work week and who is classified as part time will receive holiday pay for holidays that fall on a regularly scheduled day of work and will be compensated at the holiday rate of "double time" (hours worked at the regular rate of pay plus an additional equal amount of hours paid at the regular rate of pay) for their shift. Part-time employees are not eligible for an alternate day off. No holiday pay will be paid nor will an alternate day off given for holidays which fall on a part-time employee's normally scheduled day off.

Per Diem Employees: Per diem employees are routinely called to work to fill a specific need. Payment for holidays worked will be at "double time" (hours worked at the regular rate of pay plus an additional equal amount of hours paid at the regular rate of pay) for their shift when they are scheduled to work a holiday and are not eligible for an alternate day off.

Exempt Employees: Exempt employees who are paid for holidays will be paid straight time based on a regular 5 day work week and will typically receive their full weekly salary for weeks in which holidays occur.

Weekend Holidays: Normally, holidays are observed on the calendar day of the holiday. Those employees who are not required to work weekends may observe the holiday on the Friday before a Saturday holiday and the Monday after a Sunday holiday respectively.

Other Holiday Conditions:

- Employees who are absent due to medical leave of absence, disability or disciplinary suspension will not be eligible to receive holiday pay.

- When a paid holiday falls on or during an employee's scheduled and approved PTO, the employee will receive pay for a holiday and not PTO pay.
- In order to be eligible for the holiday options listed, an employee is required to work a full day on their regularly scheduled day before and after the holiday. Employees who are absent or tardy on either of these days will not be paid for the holiday unless the absence has been previously arranged and approved by the General Manager.
- Employees who are scheduled to work year-end holidays (i.e., Thanksgiving Day, Christmas Day) and wish to schedule an alternate day off may schedule these days into the following calendar year on or prior to February 25th in compliance with the sixty (60) day grace period.
- Holiday pay will not be considered as time worked for the purpose of overtime calculations.
- Holiday time off may not be "banked" as part of PTO. Any unused substituted holiday days will not be paid out at the time of separation.

3 Section 3- Benefits

3.1 Statutory Short-Term Disability Benefits

The company bears the bulk of the cost to provide statutory, short term disability benefits for employees . All employees contribute .5% of their gross wages (maximum of \$.60 per week) through payroll deduction.

Disability insurance provides benefits, after a seven-day waiting period, to employees who are out of work due to non-job related illnesses or injuries. An absence of this nature may qualify and run concurrently with Family and Medical Leave as allowed by law.

An employee will be required to utilize Paid Time Off (PTO) accruals during the first seven days of their absence (the waiting period). After the waiting period, employees can choose to use PTO to supplement third party payments to receive full wages. If the employee chooses not to supplement the disability payments with PTO and is not receiving a paycheck from the company, the employee will be required to submit payments for benefits directly to payroll when invoiced to ensure continuation of benefits during the absence.

An employee is not permitted to receive disability and New York State Paid Family Leave benefits at the same time, and the combined weeks of disability and New York State Paid Family Leave may not exceed 26 weeks in a 52-week period.

Disability claim forms may be obtained from the General Manager. The claim must be filed with the insurance carrier to receive a disability payment.

3.2 Workers' Compensation

All employees are protected by Workers' Compensation insurance for any injury or illness arising from and in the course of employment beginning on the first day of employment.

In the event of an on-the-job injury, it is imperative that the employee and/or their supervisor complete an incident report immediately or as soon as possible following the incident. While it is not necessary that every incident be reported to the insurance carrier, in cases where there is loss of work and/or benefit time, it is important that reports be completed in a timely manner to prevent a delay in benefits.

Absences due to work related injuries or illnesses will run concurrently with the guidelines of the Family Medical Leave Act (FMLA) if the employee meets FMLA eligibility. Employees will be required to use Paid Time Off (PTO) for the first 5 days (the waiting period) of a worker's compensation absence. After the first 5 days, the employee can choose if they wish to supplement any worker's compensation payments with the use of PTO to provide a full paycheck. If the employee chooses not to supplement the worker's compensation payments with PTO and is not receiving a paycheck from the Company, the employee will be required to submit payment for benefits directly to the Company when invoiced to ensure continuation of benefits during the absence.

You may not use New York State Paid Family Leave and Workers' Compensation at the same time.

Employees are required to present medical documentation from their health care provider indicating their fitness to return to work when returning from a job-related injury.

3.3 Insurance Programs

Full-time employees may participate in Needham Risk Management's insurance programs. Under these plans, eligible employees will receive comprehensive health and other insurance coverage for themselves and their families, as well as other benefits.

Upon becoming eligible to participate in these plans, employees will receive summary plan descriptions (SPDs) describing the benefits in greater detail. Please refer to the SPDs for detailed plan information. Of course, feel free to contact the General Manager with any further questions.

3.4 Health/Dental Insurance

Full-time employees and part-time employees who work a minimum of twenty (25) hours per week are eligible to enroll in the health, dental, and vision insurance plans offered by the company. Employees become eligible to enroll in these plans on the first of the month following 30 days of employment.

Enrollment packets containing plan information and participating providers are available from the General Manager. Once an employee is enrolled, insurance cards are mailed directly from the health insurance provider. A detailed listing of the current bi-weekly premium costs is also available from the General Manager.

The annual "open enrollment" period for benefits, particularly health, dental and vision insurance, is prior to July of each year. Employees who may have missed enrolling in the insurance plans after their initial hire date may do so during open enrollment with no waiting period penalties. Coverage for employees enrolling during the open enrollment period becomes effective July 1st.

Employees are encouraged to contact the General Manager as soon as they are aware of a "qualifying event" which will have an impact on their insurance coverage. Qualifying events are considered to be:

- Birth or legal adoption of a child
- Marriage
- Divorce
- Death of a Spouse
- A dependent child becomes ineligible due to age or change in student status

Employees are notified of any changes to the cost of insurance premiums as soon as the General Manager receives them from the insurance companies.

Upon termination of employment with the company, health and other voluntary insurance plans cease effective as of the date of termination. Information regarding continuing coverage will be supplied to the employee in compliance with the requirements prescribed by law.

3.5 Section 125 Cafeteria Plan (Flexible Spending Account)

This benefit enables employees to reduce the amount of their taxable gross wages in a plan year and also obtain reimbursement for non-covered health care costs. The plan consists of two sections:

1. Premium Coverage: Employees are able to have their portion of the bi-weekly health, dental, and/or vision premiums withheld on a pre-tax basis.
2. Unreimbursed Medical: Employees may make additional bi-weekly contributions to a separate account with the plan administrator. These payments are also withheld on a pre-tax basis and further reduce an employee's taxable income. Monies in this account may be used to cover out-of-pocket costs not covered by the health, dental and vision plans such as:
 - Doctor office visit co-pays
 - Prescription co-pays
 - Dental Insurance deductibles
 - Eyeglasses

Enrollment is conducted annually in the month of May for a July 1st plan start date only for the following fiscal year.

Employees interested in further details of this plan should contact the General Manager

3.6 Simple IRA Retirement Plan

The company also offers a Simple IRA retirement savings plan to eligible employees. An eligible employee is one who is regularly scheduled to work at least 20 hours per week. Employees may participate in the plan on the date they are first hired, or at the start of any quarter thereafter.

To sign up to make elective deferral contributions to the Simple IRA Plan, you must complete a Simple IRA Plan enrollment form, which you can obtain from the General Manager. Your elective contributions are subject to applicable Internal Revenue Code limits and the terms of the Simple IRA plan.

For more information about the Simple IRA Plan, please request a Summary Plan Description from the General Manager.

4 Section 4 - Leaves Of Absence

4.1 Personal Leave

We realize that leaves of absence due to prolonged illness, accidents, or other compelling reasons are sometimes necessary. Although leaves of absence are uncommon, a leave of absence from work should be properly arranged through your supervisor. The term "leave of absence" means an approved absence from work without pay for a period of time in excess of five (5) working days. The granting of a leave of absence, especially an extended one, does not guarantee that there will be a position available to you after the end of your leave. Each case will be treated individually and upon

your return, every effort will be made to give you the best available job for which you are qualified by experience, ability, and tenure. Employees returning from a leave necessitated by medical reasons may be required to provide a doctor's release. If you have any questions, please speak to the General Manager.

If employees are ineligible for any other company leave of absence, Needham Risk Management, under certain circumstances, may grant a personal leave of absence without pay. A written request for personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and employees are not eligible for leave under the federal Family and Medical Leave Act (FMLA) or any state leave law, medical certification also must be submitted. The request will be considered on the basis of staffing requirements and the reasons for the requested leave, as well as performance and attendance records. Normally, a leave of absence will be granted for a period of up to eight (8) weeks. However, a personal leave may be extended if, prior to the end of leave, employees submit a written request for an extension to management and the request is granted. During the leave, employees will not earn paid time off, personal days, or sick days. Needham Risk Management will continue health insurance coverage during the leave if employees submit their share of the monthly premium payments to the company in a timely manner, subject to the terms of the plan documents.

When the employee's anticipate returning to work, they should notify management of the expected return date. This notification should be made at least one (1) week before the end of the leave.

Upon completion of the personal leave of absence, the company will attempt to return employees to their original job or a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of the availability to return to work, failure to return to work when notified or a continued absence from work beyond the time approved by the company will be considered a voluntary resignation of employment.

Personal leave runs concurrently with any company-provided Short-Term Disability Leave of Absence.

4.2 State Paid Family Leave

New York State Paid Family Leave (PFL) is available to eligible employees for up to 12 weeks within any 52-consecutive-week period. PFL is available for any of the following reasons:

- To participate in providing care, including physical or psychological care, for the employee's family member (child, spouse, domestic partner, parent, sibling, grandchild, or grandparent) with a serious health condition;
- To bond with the employee's child during the first 12 months after the child's birth, adoption, or foster care placement; or
- For qualifying exigencies, as interpreted by the Family and Medical Leave Act (FMLA), arising out of the fact that the employee's spouse, domestic partner, child, or parent is on active duty (or has been notified of an impending call or order to active duty) in the armed forces of the United States.

For purposes of this policy, family members include the employee's child, spouse, domestic partner, parent, grandchild, grandparent, or sibling. "Child" means a biological, adopted, or foster son or daughter, a stepson or stepdaughter, a legal ward, a son or daughter of a domestic partner, or the person to whom the employee stands *in loco parentis*. "Parent" means a biological, foster, or adoptive

parent, a parent-in-law, a stepparent, a legal guardian, or other person who stood *in loco parentis* to the employee when the employee was a child. "Grandchild" means a child of the employee's child. "Grandparent" means a parent of the employee's parent. "Sibling" means a biological or adopted sibling, a half-sibling, or stepsibling.

Employees who have a regular work schedule of 20 or more hours per week and have been employed at least 26 consecutive weeks before the date Paid Family Leave (PFL) begins (or who have a regular work schedule of less than 20 hours per week and have worked at least 175 days to the date PFL begins) are eligible for PFL. Paid time off can be counted toward the employee's eligibility determination. Employees are eligible for PFL regardless of citizenship and/or immigration status. Employees have the option to file a waiver of PFL and therefore not be subject to deductions when their regular employment schedule is:

- 20 or more hours per week but the employee will not work 26 consecutive weeks; or
- Fewer than 20 hours per week and the employee will not work 175 days in a 52-consecutive-week period.

The 52-consecutive-week period is determined retroactively with respect to each day for which PFL benefits are currently being claimed.

PFL benefits are financed solely through employee contributions via payroll deductions.

The weekly monetary benefit will be 67 percent of the employee's average weekly wage, up to 67 percent of the state average weekly wage.

4.3 Bereavement Leave

The death of a family member is a time when employees wish to be with their families. If employees lose a close relative, they will be allowed paid time off of up to 3 workdays to assist in attending to their obligations and commitments. For the purposes of this policy, a close relative includes a spouse, domestic/civil union partner, child, parent (including in-laws and stepparents), sibling, grandparents, or any other relation required by applicable law. Paid leave days only may be taken on regularly scheduled, consecutive workdays following the day of death. Employees must inform their supervisor prior to commencing bereavement leave. In administering this policy, The Company may require verification of death.

Bereavement time may be requested and granted upon the death of other close relatives not listed above at the discretion of the General Manager. If additional time is required for travel or unusual circumstances, Paid Time Off (PTO) may be used (if available) with the approval of the General Manager.

Unused bereavement days are not payable upon termination of employment.

4.4 Sick Leave

Effective January 1, 2021, New York State permits employees to use accrued leave for the following reasons which impact an employee or a member of their family for whom they are providing care, or assistance with care:

- A mental or physical illness, injury, or health condition of the employee or family member, regardless of whether such illness, injury, or health condition has been diagnosed or requires medical care at the time sick leave is requested;

- The diagnosis, care, or treatment of a mental or physical illness, injury, or health condition of, or need for medical diagnosis of, or preventive care for, the employee or family member; or
- An absence from work due to any of the following reasons when the employee or family member has been the victim of domestic violence, a family offense, sexual offense, stalking, or human trafficking:
 1. To obtain services from a domestic violence shelter, rape crisis center, or other services program;
 2. To participate in safety planning, temporarily, or permanently relocate or take other actions to increase the safety of the employee or family members;
 3. To meet with an attorney or other social services provider to obtain information and advice on, and prepare for or participate in, any criminal or civil proceeding;
 4. To file a complaint or domestic incident report with law enforcement;
 5. To meet with a district attorney's office;
 6. To enroll children in a new school; or
 7. To take any other actions necessary to ensure the health or safety of the employee or family members or to protect associates or work colleagues.

A person who has committed such domestic violence, family offense, sexual offense, stalking, or human trafficking will not be eligible for paid leave for situations in which the person committed such offense and was not a victim, notwithstanding any family relationship.

For purposes of this policy, "family member" means:

- A child (biological, adopted, or foster child, a legal ward, or a child of the employee standing in loco parentis);
- Spouse or domestic partner;
- Parent (biological, foster, step, adoptive, legal guardian, or person who stood in loco parentis when the employee was a minor child);
- Sibling;
- Grandchild or grandparent; and
- The child or parent of the employee's spouse or domestic partner.

Unless advised otherwise, the company will assume, subject to applicable law, that employees want to use available leave for the reasons set forth above, and employees will be paid for such absences to the extent they have paid leave available.

Notice and Documentation

Employees may make oral or written requests to the General Manager to use leave.

The company may require supporting documentation for the use of leave where the employee uses leave for three (3) or more consecutive or previously scheduled workdays or shifts, to the extent permitted by applicable law. Requests for documentation should not specify the reason for leave but should be limited to: (i) an attestation from a licensed medical provider supporting the existence of a need for leave, the amount of leave needed and a date that the employee may return to work; or (ii) an attestation from an employee of their eligibility to leave. The company will not require disclosure of confidential information relating to a mental or physical illness, injury, or health condition or

information relating to absence from work due to domestic violence, a sexual offense, stalking, or human trafficking, as a condition of providing leave. The company will not require an employee to pay any costs or fees associated with obtaining medical or other verification of eligibility for use of leave.

Use of sick leave is not considered hours worked for purposes of calculating overtime.

Enforcement and Retaliation

Employees will not be discharged, threatened, penalized, or in any other manner discriminated or retaliated against because they have exercised their rights to request and use leave under this policy and applicable law.

If employees have any questions regarding this policy, they should contact the General Manager.

4.5 Bone Marrow Donation Leave

Under New York State law, eligible employees who work more than twenty (20) hours per week may be granted a leave of absence in order to undergo a medical procedure to donate bone marrow. The combined length of the leave must be determined by a physician but may not exceed 24 work hours unless agreed to by the company. If you believe that you have a need for this leave, please contact the General Manager.

Bone Marrow Donation leave does not accrue at the end of the calendar year.

4.6 Blood Donation Leave

Employees who work an average of at least 20 hours per week are eligible for up to three (3) hours of unpaid leave in any 12-month period for donating blood. Employees must provide advance notice of at least three (3) working days of their intention to avail themselves of this leave, except in emergency situations. Employees may use accrued paid time off for this purpose.

4.7 Breastfeeding

Lactation Accommodation

Employees have the right to express breast milk in the workplace pursuant to federal and New York law.

The company provides employees who are nursing with reasonable paid break time or permit employees to use paid break time or mealtime to express breast milk for the employee's nursing child each time such employee has a reasonable need to express break milk for up to three (3) years after the birth of a child.

Upon request of an employee who chooses to express breast milk in the workplace, the company will designate a room or other location which will be made available for use by such employee to express breast milk. Such room or other location will be a place that is:

1. In close proximity to the work area,
2. Well-lit,
3. Shielded from view, and
4. Free from intrusion from other persons in the workplace or the public.

Such a room or other location will provide, at minimum, a chair, a working surface, nearby access to clean running water, and, if the workplace is supplied with electricity, an electrical outlet. The room or location provided by the company for this purpose must not be a restroom or toilet stall.

If the sole purpose or function of such room or other location is not dedicated for use by employees to express breast milk, such room or other location will be made available to such employee when needed and will not be used for any other purpose or function while in use by such an employee. The company will provide notice to all employees as soon as practicable when such room or other location has been designated for use by employees to express breast milk.

Where compliance with the lactation room requirements set forth above is impracticable because it would impose an undue hardship on the company by causing significant difficulty or expense when considered in relation to the size, financial resources, nature, or structure of the company's business, the company will make reasonable efforts to provide a room or other location, other than a restroom or toilet stall, that is in close proximity to the work area where the employee can express breast milk in privacy.

If the workplace has access to refrigeration, the company will extend such access to refrigeration for the purposes of storing the expressed milk.

Employees may submit a request for a room or other location for use by employees to express breast milk by contacting the General Manager. The General Manager will respond to such requests within five (5) business days.

Employees will not be discharged, threatened, penalized, or in any other manner discriminated against or retaliated against for exercising their rights under this policy and applicable law.

Employees should refer to the New York State Department of Labor's Policy on the Rights of Employees to Express Breast Milk in the Workplace, available at: <https://dol.ny.gov/system/files/documents/2023/06/p705-policy-on-the-rights-of-employees-to-express-breast-milk-in-the-workplace-single.pdf> for additional details.

Employees should consult the General Manager with questions regarding this policy.

4.8 Jury Duty Leave

Needham Risk Management realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. Employees are expected, however, to provide proper notice of a request to perform jury duty and verification of their service, including fees received for jury duty service.

Employees also are expected to keep management informed of the expected length of jury duty service and to report to work for the major portion of the day if excused by the court. If the required absence presents a serious conflict for management, employees may be asked to try to postpone jury duty.

The company will compensate the juror with a fee of \$40 or the juror's regular wage (whichever is lower) for the first three (3) days of jury service. Exempt employees will be paid their full salary less jury duty fees for any week in which they performed work for the company and missed work due to jury service.

4.9 Witness Leave

Employees called to serve as a witness in a judicial proceeding must notify their supervisor as soon as possible.

Employees will not be compensated for time away from work to participate in a court case, but may use available paid time off to cover the period of absence.

Employees that appear in court to testify as a witness or victim, or to consult with a district attorney or obtain an order of protection, will not be disciplined or discharged for their absence.

4.10 Military Leave

If employees are called into active military service or enlist in the uniformed services, they will be eligible to receive an unpaid military leave of absence. To be eligible for military leave, employees must provide management with advance notice of service obligations unless they are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable to provide such notice. Provided the absence does not exceed applicable statutory limitations, employees will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws. Employees should ask management for further information about eligibility for Military Leave.

If employees are required to attend yearly Reserves or National Guard duty, they can apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by law (including travel). They should give management as much advance notice of their need for military leave as possible so that The Company can maintain proper coverage while employees are away.

4.11 Family Military Leave

Employees who work an average of at least 20 hours per week and are spouses of military members generally are entitled to up to 10 days of unpaid leave during any period when the spouse in the military is on leave from active duty. Prior notice is requested for staffing reasons. Employees will not be retaliated against for exercising their rights under this policy.

Leave runs concurrently with FMLA Qualifying Exigency leave to the extent both are applicable.

4.12 Voting Leave

Employees who are eligible to vote in an election and who do not have at least four (4) consecutive hours before or after work while polls are open may request up to two (2) hours with pay to be used at the beginning or the end of their normally scheduled workday as designated by the employer to enable them to vote.

Employees must notify Needham Risk Management of their intention to take time off to vote at least two (2) working days prior to Election Day.

5 Section 5 – Employee Standards of Conduct

5.1 Employee Conduct

It is our philosophy and ongoing goal to create and maintain a working environment where all employees are safe, feel comfortable and enjoy coming to work. To achieve this requires cooperation from everyone and a set of guidelines that apply equally to all. In the following sections we have described the standards of behavior your fellow employees and we expect from you.

We believe that certain types of behavior in the workplace are counterproductive, unacceptable, or unsafe. For that reason we have established appropriate rules and procedures. Any behaviors that are unacceptable in the workplace may result in disciplinary action up to and including discharge from employment. The company reserves the right to act in its best interest. This list is not inclusive of all the possible situations that might constitute unacceptable, counterproductive or unsafe behavior but provides examples:

- Insubordination or refusal to obey orders of management pertaining to work or duties.
- Deliberate constriction of work output.
- Possessing, using, or being under the influence of alcoholic beverages, illegal drugs, or controlled substances while on work time.
- Willful falsification of information on the employment application.
- Immoral conduct or indecency on company property.
- Possession of illegal weapons, explosives or fireworks on work time.
- Physical abuse of other employees.
- Excessive absenteeism or tardiness, even if unavoidable; failing to report to work without satisfactory explanation or notice.
- Disruption of the work routine, unauthorized absence from your work area or sleeping on the job.
- Inappropriate or unauthorized possession, use, removal or willful destruction of company property or the property of another.
- Misuse of company funds.

Obviously, not every type of misconduct can be listed. Note that all employees are employed at will, and Needham Risk Management reserves the right to impose whatever discipline it chooses, or none at all, in a particular instance. The company will deal with each situation individually and nothing in this handbook should be construed as a promise of specific treatment in a given situation. However, Needham Risk Management will endeavor to utilize progressive discipline but reserves the right in its sole discretion to terminate the employee at any time for any reason.

The observance of these rules will help to ensure that our workplace remains a safe and desirable place to work.

5.2 General Operations

Needham Risk Management has many public school entities as clients. As an employee of Needham Risk Management, you are never authorized to be alone with a student at the district or in any other setting, enter locker rooms or classrooms without a district employee escort or transport students of public or private school entities without written permission from the General Manager or Principal. There is no communication with a student (either written or verbal) that is authorized without presence or supervision of a district employee. Additionally, you are not authorized to be videotaped or recorded by any client for any reason without written permission from the Principal or General Manager.

5.3 Personal Appearance

As an employee of Needham Risk Management, you must maintain a clean, safe and professional appearance. Your attire should be consistent with the type of work you are performing as well as being appropriate for the position you hold and the image the company seeks to project. Clothing must be neat and clean. Good personal grooming and hygiene are also essential and should contribute to a professional appearance.

Employees, who come in contact with the public, are expected to dress in accepted business attire. If you have any questions please speak to the General Manager.

5.4 Substance Abuse

The company takes seriously the problem of drug and alcohol abuse and is committed to providing a work-place free of such substances. This policy applies to all employees of the company.

No employee is allowed to consume, possess, sell or purchase any alcoholic beverage on any property owned by the company, or in any vehicle owned or leased by the company. No employee may use, possess, sell, transfer, or purchase any drug or controlled substance that may alter an individual's mental or physical capacity while working for the company. The exceptions are over-the-counter pain relievers and the like, used as intended and directed, and any other drugs that have been prescribed to you, and which are being used as prescribed by your doctor.

The company will not tolerate employees that are impaired by or under the influence of alcohol or drugs while working.

In cases where the use of alcohol or drugs poses a threat to the safety of other people or property, you must report the violation. Employees who violate our Substance Abuse Policy will be subject to disciplinary action, up to and including termination.

5.5 Non-Harassment

It is Needham Risk Management's policy to prohibit intentional and unintentional harassment of or against our employees, job applicants, and interns by another employee, supervisor, vendor, customer, or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state, or local laws (referred to as "protected characteristics"). The policy also protects contractors, subcontractors, vendors, consultants, or anyone else providing services in our workplace. These individuals include persons commonly referred to as independent contractors, gig workers, and temporary workers. Also

included are persons providing equipment repair, cleaning services, or any other services through a contract with the company. The company also prohibits retaliation as defined below. All such conduct will not be tolerated by the company.

The company is committed to a workplace free of harassment (including sexual harassment), discrimination, and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as remote work settings, business trips, and Company-sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor, or other third party. In addition to being a violation of this policy, harassment (including sexual harassment) and retaliation based on any protected characteristic as defined by applicable federal, state, or local laws are unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted, or testified in an investigation or proceeding involving a complaint of sexual harassment are unlawful.

Sexual and other harassment, discrimination, and retaliation are against the law. After reading policy, employees will understand their right to a workplace free from harassment. Employees also will learn what harassment, discrimination, and retaliation look like, what actions they can take to prevent and respond to discriminatory conduct, and how they are protected from retaliation after taking action. The policy will also explain the investigation process into any claims of harassment. The full policy and reporting form are located Needham Risk Management's Programs and Policies folder in the shared drive that all employees have the ability to access upon hiring. Employees should read and acknowledge understanding of this policy.

5.6 Workplace Violence Prevention

The company prohibits intimidation, harassment, threats of violence, or actual violence against another employee, a Client, or a member of the public conducting business with Needham Risk Management. Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public will not be tolerated.

All threats of violence or actual violence, both direct and indirect, as well as suspicious activities, should be reported as soon as possible to the General Manager or a member of management. The company will promptly and thoroughly investigate all reports of threats of violence, actual violence, and suspicious activities. Anyone determined to be responsible for threats of violence, actual violence, or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

5.7 Use of Communications And Computer Systems

Needham Risk Management's communication and computer systems are intended primarily for business purposes; however limited personal usage is permitted if it does not hinder performance of job duties or violate any other Company policy. This includes the voice mail, e-mail and Internet systems. Users have no legitimate expectation of privacy in regard to their use of Needham Risk Management systems.

Needham Risk Management may access the voice mail and e-mail systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Company deems it appropriate to do so. The reasons for which the company may obtain such access include but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for

information; and ensuring that Company operations continue appropriately during the employee's absence.

Further, Needham Risk Management may review Internet usage to ensure that such use with Company property, or communications sent via the Internet with Company property, are appropriate. The reasons for which the company may review employees' use of the Internet with Company property include but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company operations continue appropriately during the employee's absence.

The company may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The company's policies prohibiting harassment, in their entirety, apply to the use of Company's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since the company's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords.

Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization.

Violators of this policy may be subject to disciplinary action, up to and including discharge.

5.8 Use of Social Media

Needham Risk Management respects the right of any employee to maintain a blog or web page or to participate in a social networking, Twitter, or similar site, including but not limited to Facebook and LinkedIn. However, to protect Company interests and ensure employees focus on their job duties, employees must adhere to the following rules:

Employees may not post on a blog or web page or participate on a social networking platform, such as Twitter or similar site, during work time or at any time with company equipment or property.

All rules regarding confidential and proprietary business information apply in full to blogs, web pages, and social networking platforms, such as Twitter, Facebook, LinkedIn, or similar sites. Any information that cannot be disclosed through a conversation, a note, or an e-mail also cannot be disclosed in a blog, web page, or social networking site.

Whether the employees are posting something on their own blog, web page, social networking, Twitter, or similar site or on someone else's, if the employee mentions the company and also expresses either a political opinion or an opinion regarding the company's actions that could pose an actual or potential conflict of interest with the company, the poster must include a disclaimer. The poster should specifically state that the opinion expressed is a personal opinion and not the company's position. This is necessary to preserve the company's good will in the community.

Any conduct that is impermissible under the law if expressed in any other form or forum is impermissible if expressed through a blog, web page, social networking, Twitter, or similar site. For

example, posted material that is discriminatory, obscene, defamatory, libelous, or violent is forbidden. Company policies apply equally to employee social media usage.

Needham Risk Management encourages all employees to keep in mind the speed and manner in which information posted on a blog, web page, and/or social networking site is received and often misunderstood by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including discharge.

5.9 Use of Company Property

The company will provide you with the necessary equipment to do your job including but not limited to laptops, projectors, and other specialized equipment. None of this equipment should be used for personal use, nor should any equipment be removed from the work premises unless approved by the General Manager.

Use of the company's stationary, office supplies, or postage for personal use is strictly prohibited.

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.

Employees should notify their supervisor if any equipment, machines, or tools appear to be damaged, defective or in need of repair. Prompt reporting of loss, damage, defects and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Supervisors can answer any questions about the employees' responsibility for maintenance and care of equipment used on the job.

Employees also are prohibited from any unauthorized use of the company's intellectual property, such as digital media, print materials and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, up to and including discharge.

Further, the company is not responsible for any damage to employees' personal belongings unless the General Manager provided advance approval for the employee to bring the personal property to work.

5.10 Internet/E-Mail Usage Policy

Internet usage is provided to employees to conduct work-related business. Incidental and occasional personal use is permitted. Non-business internet activity will be restricted to non-business hours e.g. lunch periods. This privilege should not be abused and must not affect a user's performance of employment related activities.

All employees have an obligation to use their access to the internet in a responsible and informed way, conforming to network etiquette, customs and courtesies. The following outlines some of the guidelines in effect regarding e-mail and internet usage:

- All data on information systems at Needham Risk Management, used at Needham Risk Management, or transmitted over Needham Risk Management's networks, whether personal or company-owned, is classified as company proprietary information;

- Any attempt to circumvent the company's security procedures or that of other institutions, organizations, companies or individuals, is strictly prohibited;
- Unauthorized use, destruction, modification, and/or distribution of company information or information systems are strictly prohibited;
- All company information systems will be subject to monitoring and auditing at all times. Users acknowledge that they have no expectation of privacy with regard to their activity on the company's information systems. Any illegal activity, including but not limited to, the transmission of copyright or trade secret material, the transmission of obscene or threatening material, or the participation in any type of criminal activity is strictly prohibited;
- Use of any company information systems or dissemination of information in a manner bringing disrepute, damage, or ill will against the company or any of its personnel is not authorized;
- Individual passwords will be kept strictly confidential. In no situation should a username and password be given to another individual; or,
- Misuse, as defined in this policy, will be handled directly with the offender and could include disciplinary action up to and including discharge.

5.11 Software

The company discourages/prohibits the downloading of software from the Internet because of the significant risk of infecting the company systems with a virus and the unreliability of such downloaded software. All information systems will be subject to periodic inventory and inspection for compliance.

5.12 Camera Phones/Recording Devices

Due to the potential for issues such as invasion of privacy, sexual harassment, and loss of productivity, as well as inappropriate disclosure of confidential information, no employee may use a video recording camera phone function on any phone on company property or while performing work for the company without consent of the individuals being recorded.

The use of voice recording devices anywhere on company property, including to record conversations or activities of other employees or management, or while performing work for the company, is also strictly prohibited, unless the device was provided to you by the company and is used solely for legitimate business purposes.

5.13 Phone Calls

Business Phone Calls: A great majority of our business is conducted over the phone making our telephone techniques extremely important. A friendly but businesslike telephone manner should always be projected.

Personal Phone Calls: We recognize that periodically, personal phone calls must be made or be received during the business. Such calls should be held to a minimum so that they do not in any way interfere with an employee's productivity.

5.14 Inspections

To the maximum extent permitted by applicable law, Needham Risk Management reserves the right to require employees while on company property, or on client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Company or client property, and work areas. This includes lockers, vehicles, desks, cabinets, workstations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to the company or to its clients. Employees are expected to cooperate in the conduct of any search or inspection.

5.15 Smoking

For the health and safety of our staff, tobacco use and smoking is prohibited in all indoor areas of company facilities and client facilities with the exception of outdoor designated smoking areas. While onsite at client facilities, employees of Needham Risk Management must adhere to all smoking rules as outlined in client contractor training and may only smoke in designated areas stipulated by the client.

Employees found to be smoking in areas other than the designated area will be subject to corrective action, up to and including termination of employment.

5.16 Solicitation And Distribution

No employee is permitted to solicit funds from clients, visitors or employees for any purpose, or to distribute written or other material or to post notices in the building without approval from the Principal or General Manager.

- Solicitation of any kind by one employee of another employee is not allowed while either employee is on his or her working time. Working time is the time when employees are expected to be working and does not include time before work, permitted breaks, meal periods or time after work.

May not distribute literature during working time for any purpose. Working time includes the working time of both the employee doing the solicitation or distributing and the employee to whom the soliciting or distributing is directed. Working time does not include break time, mealtime or any other specified periods during the workday when employees are not engaged in performing their work tasks.

- May not distribute literature at any time for any reason in working areas. Working areas are all areas of Needham Risk Management facilities except employee breakrooms and parking areas.

It is the responsibility of each employee to report any attempt by third parties to solicit.

5.17 Bulletin Boards

Important notices and items of general interest are continually posted on the company bulletin boards. Employees should make it a practice to review bulletin boards frequently. This will assist employees in keeping up with what is current at Needham Risk Management. To avoid confusion, employees should not post or remove any material from the bulletin board.

5.18 Confidential Company Information

Needham Risk Management is committed to protecting the confidentiality of information (including protected health information as that term is defined by 45 C.F.R. 160.103) concerning employees.

Employees have a legal and moral responsibility to protect the confidentiality of privileged information obtained through daily operations. This includes, but is not limited to, information contained in medical records, computer systems and employee personnel records.

Employees may not use or disclose protected health information, except either: (1) in the course of doing their job; and/or (2) as the individual who is the subject of the information (or the individual's personal representative authorized in writing).

Required Disclosures: Designated employees must disclose protected health information in only two situations: (a) to individuals (or their personal representatives) specifically when they request access to, or an accounting of disclosures of, their protected health information; and (b) to authorized health and human service governmental agencies when it is undertaking a compliance investigation or review or enforcement action.

Improper communication of confidential information (i.e., the release, possession, copying, use, reading or discussion of such information inappropriately or without proper authority) is prohibited and may be grounds for corrective action up to and including termination of employment.

5.19 Conflicts of Interest And Business Ethics

A real or potential conflict of interest (or the appearance thereof) can occur when you are in a position to influence a decision that may result in personal gain for yourself, a co-worker, a relative, or another person or entity with whom you have a business or personal relationship. A real or potential conflict of interest may also occur if you develop outside business relationships with customers, suppliers, or competitors of the company. We expect that you will be careful to avoid any situations that would result in a real or potential conflict of interest (or the appearance thereof). If at any time you are unsure if a conflict of interest exists, please discuss the situation with the General Manager.

Employees may not any time, during or after their employment, use the Company's intellectual property (including, but not limited to presentation materials, written programs, client contact list, strategic approaches) for personal benefit in a manner that is not beneficial to the Company.

5.20 Safety and Health

Needham Risk Management is committed to the safety and health of its employees, customers and visitors. The company's philosophy is oriented toward affirmative control and minimization of risk to the greatest extent possible. We have a basic responsibility to make the safety of employees our concern. We will be counting on you do your part in making our program an effective one.

Employee responsibilities include:

- All employees shall be responsible for learning and complying with all safety and health rules and regulations outline in the Company's Safety and Health Policy binder. It is their further responsibility to support the Company in providing a safe place to work, and to protect themselves and co-workers against injuries or illnesses.

- Employees shall report all safety and health hazards to their supervisors and, when appropriate, shall take all necessary actions to establish an immediate temporary control of the hazard until permanent control can be established.
- Employees shall immediately report all accidents or incidents occurring on the job to their supervisor, including industrial injury accidents no matter how slight, and complete the required reporting forms.
- Employees shall cooperate and assist in the investigation of all accidents or incidents.
- Employees shall utilize all personal protective equipment provided and required for the tasks to be performed.
- Employees shall comply with all company safety and health rules and follow the directions of managers, supervisors and the company's safety officer.

All work-related accidents are covered by Worker's Compensation Insurance pursuant to the laws of the state in which we operate.

The company reserves the right to require employees to receive protective vaccines, medical screening or testing where it is required by the company's clients or in the interests of public health.

5.21 Hiring Relatives/Employee Relationships

A familial relationship among employees can create an actual or at least a potential conflict of interest in the employment setting, especially where one relative supervises another relative. To avoid this problem, Needham Risk Management may refuse to hire or place a relative in a position where the potential for favoritism or conflict exists.

In other cases, such as personal relationships where a conflict or the potential for conflict arises, even if there is no supervisory relationship involved, the parties may be separated by reassignment or discharged from employment, at the discretion of the company. Accordingly, all parties to any type of intimate personal relationship must inform management.

If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. The company generally will attempt to identify other available positions, but if no alternate position is available, the company retains the right to decide which employee will remain with the company.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

5.22 Publicity/Statements To The Media

All media inquiries regarding the position of the company as to any issues must be referred to the Principal. Only the Principal is authorized to make or approve public statements on behalf of the company. No employees, unless specifically designated by the Principal, are authorized to make those statements on behalf of the company. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of the company must first obtain approval from the Principal.

5.23 Operation Of Vehicles

All employees authorized to drive company-owned or leased vehicles or personal vehicles in conducting company business must possess a current, valid driver's license and an acceptable driving record. Any change in license status or driving record must be reported to management immediately.

Employees must have a valid driver's license in their possession while operating a vehicle off or on company property. It is the responsibility of every employee to drive safely and obey all traffic, vehicle safety, and parking laws or regulations. Drivers must demonstrate safe driving habits at all times.

Company-owned or leased vehicles may be used only as authorized by management.

All employees authorized to drive company-owned or leased vehicles or personal vehicles in conducting company business are required to sign Needham Risk Management's Fleet Policy prior to any vehicle use and adhere to all rules dictated in the policy.

Portable Communication Device Use While Driving

Employees who drive on company business must abide by all state or local laws prohibiting or limiting portable communication device (PCD) use, such as cell phones, while driving. Further, even if use is permitted, employees may choose to refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employees are driving, and permitted by law, they must use a hands-free option and advise the caller that they are unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a PCD while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

5.24 Expense Reimbursements

Mileage Reimbursement

The company will reimburse employees for the use of their privately owned vehicles in the conduct of necessary company business. Reimbursement will also be made for occasions when a company-owned vehicle is not available, or when it is in the company's best interest that a privately owned vehicle be used. The amount of reimbursement will be computed by multiplying the miles driven as claimed by the employee, by the standard IRS mileage rate for the given period minus the regularly travelled mileage to/from the office. Mileage payments will be made bi-weekly with payroll.

Corporate Credit Card

The company issues corporate credit cards to employees on an as needed basis. To be eligible for a corporate credit card, an employee must travel frequently in the course of his/her duties, purchase

significant volumes of goods and services for use by the employer, or incur other regular frequent business expenses of a kind appropriately paid by credit card.

The corporate credit card cannot be used to obtain cash advances, bank checks, traveler's checks, or electronic cash transfers, or for personal expenses. Misuses of the card will result in cancellation of the card and withdrawal of corporate credit card privileges. If the card is used for an employee's personal expenses, the employer reserves the right to recover these monies from the employee cardholder.

Each card will be limited to a maximum of \$1,500 unless another threshold is approved by the General Manager. Limits may be less depending on the cardholder's position and expense requirements. Increases to the established maximum may be made on a case-by-case basis. Corporate credit card expenditures must be supported with original receipts submitted to the General Manager within a reasonable period of time as deemed by the General Manager. Cardholders who have not submitted receipts to support their monthly expenditures within that period of time will be asked to submit them immediately and continued or repeated non-conformance to this policy will result in cancellation of the card and such other actions as appropriate.

Lost or stolen cards must be reported immediately to the General Manager.

Personal Cell Phone Use

The Company understands that it is necessary for some employees to use their personal cell phones for business purposes and as such will pay \$300 per employment year to offset employee's cell phone bill.

Gym/Fitness Expense Reimbursement

Needham Risk Management encourages employees to achieve and maintain a healthy lifestyle through physical fitness. Gym membership reimbursement is available to employees who have been employed for a minimum of 3 months.

Employees will be reimbursed for memberships up to \$120.00 per employment year for eligible fees. Eligible fees for an individual membership at a fitness center or organized sport/club with fitness benefits (i.e. Hockey League, Soccer League, etc.).

Employees with a family membership must provide documentation of the cost for an individual membership and will be reimbursed based upon that amount. Employees will be reimbursed on a monthly basis, regardless of the type of membership (annual or monthly).

Employees must follow the expense report procedure to get reimbursed. An expense report and copy of the receipt must be submitted each month. Expense reports and receipts must be submitted to the General Manager.

Weight-loss programs, smoking-cessation programs, and other similar programs, although encouraged as part of an overall fitness program, do not qualify for reimbursement.

The amount reimbursed to employees will be reported as taxable income to the Internal Revenue Service and is subject to FICA, Medicare, federal, state, and local taxes.

Employees should consult with a physician before beginning a physical regimen.

5.25 Political Activity

Employees are restricted from using work time and organizational resources to support a candidate. Employees may not make campaign flyers using company-owned equipment or use the organization's mailing list to pinpoint potential campaign donors. In addition, employees are prohibited from using

their work-issued phone number, email address, office address, or the organization's name when communicating with candidates or participating in a political campaign.

5.26 Office Closure

Needham Risk Management will make every effort to maintain normal work hours even during inclement weather. If the office closes due to inclement weather or some other unforeseen circumstance, employees will be paid for such time off. Non-exempt employees will only be paid if normally scheduled to work that day and only for those hours which the employee would normally work.

Employees unable to arrive for work on a day where there is inclement weather and the office is NOT closed will be charged one (1) day of paid time off. If no paid time off is available and the employee is considered non-exempt they will not be paid for the day.

All employees who are unable to report to work should contact the General Manager and report their absence one (1) hour prior to the start of their work day.

Time absent from work under these circumstances shall not be counted as hours worked when computing weekly overtime.

On days when weather conditions worsen as the day progresses, the Company may decide to close early. In such cases, a decision and an announcement will be made. Employees will be expected to remain at work until the appointed closing time, unless their flextime day ends prior to that time, or they receive permission from the General Manager to do otherwise.

6 Section 6- Performance Counseling

It is the intent of the company to ensure that employees are treated in a fair and just manner at all times. It is our hope that this corrective action process will provide employees with an opportunity to improve their performance as well as their interpersonal relationships with their co-workers and supervisors. When situations arise that require employee corrective action, every effort will be made to ensure that such action is proper, consistent and undertaken only after careful consideration of the nature of the infraction.

The ultimate objective of effective corrective action is to rectify misconduct or poor performance in a just and constructive manner and to reduce the likelihood of its recurrence. Supervisors may have on-going conversations with their staff to correct situations as they arise. These verbal interactions do not necessarily constitute formal corrective action.

There are times when the informal coaching method fails to produce the required change, or the problem is too serious for an informal approach. In these circumstances, we will apply a formal system of counseling that operates under two basic assumptions:

- First, that you are an adult with a performance problem to solve; and
- Second, the problem should be solved by the person who is in the best position to do so, and that is you.

While we utilize a progressive approach to discipline, which may or may not include oral warnings, written warnings, suspension or termination, there are situations that may warrant an exception to the formal counseling process. You may not be afforded one or more of the steps in this process if your conduct is judged to be so unacceptable that, after investigation, it is determined to be in the

best interest of your co-workers or the company for your employment to be terminated without notice.

Corrective action will normally bear a reasonable relationship to the nature and circumstances of the particular incident and the employee's overall work record, including past corrective action.

The levels of corrective action are as follows, in order of increasing severity:

1. Documented Oral Counseling: Issued in writing when an employee commits a minor infraction or shows the first sign of unsatisfactory conduct or performance. An employee is normally allowed one (1) oral counseling before progressing to the next step in the disciplinary process.
2. Written Warning: Issued when an employee commits a major offense, including any violation as described in the "Employee Conduct" policy contained in this handbook. An employee is normally allowed two (2) written warnings before progressing to the next step of the disciplinary process. Two (2) written warnings, whether they relate to the same infraction or not, require immediate evaluation by the supervisor and the Director of Administrative Services and may warrant suspension and/or dismissal.
1. Probation: Placing an employee on probation at any time during the disciplinary process or extending an employee's ninety (90) day introductory period indicates that the employee is in danger of being dismissed.
2. Suspension Without Pay: An employee will be suspended without pay for a period to be determined by the General Manager when an infraction is determined to be severe or when it is necessary to restrict the employee from performing work duties while an investigation of an incident is being conducted.
3. Dismissal: Dismissal may be warranted in cases determined by the General Manager to constitute severe misconduct as outlined in the "Employee Conduct" policy as well as instances of continued substandard performance.

The foregoing internal guidelines do not change the employment "at will" status of any employee. The company reserves the right to immediately terminate the employment of any employee under circumstances where it is determined that it is in the overall best interests of the company to do so.

7 LEAVING THE COMPANY

7.1 Voluntary Termination

If you choose to leave Needham Risk Management, it will be considered voluntary and we ask that you give us a minimum of two weeks' notice of your plans to leave. This notice period gives us an opportunity to make transition arrangements with your co-workers and to begin a search for your replacement.

The resignation process includes returning company property.

Payment of accrued PTO will be made to employees who leave the company in good standing. In order to be considered as being in good standing, an employee has to have provided the company with the required notice, and worked the notice period. An employee who does not report to work during the notice period will forfeit payment of accrued PTO.

7.2 Involuntary Termination

A termination is considered involuntary when the company initiates it. There are several types of involuntary terminations that may include the following:

1. Job Performance;
2. Termination for Cause; or,
3. Reduction in force/Restructuring/Job Elimination.

Employees who are involuntarily terminated for cause or for job performance are ineligible for payment of accrued PTO hours.

7.3 Requests for Former Employee Information

After you leave, if you seek employment with another company, we will respond to the new or prospective employer's inquiry by confirming only the dates of your employment and your last position. It is the company's policy not to give verbal or written recommendations to former employees.

Requests should be directed to the General Manager.

8 A Few Closing Words

This handbook is intended to give employees a broad summary of things they should know about Needham Risk Management. The information in this handbook is general in nature and, should questions arise, any member of management should be consulted for complete details. While we intend to continue the policies, rules and benefits described in this handbook, Needham Risk Management, in its sole discretion, may always amend, add to, delete from or modify the provisions of this handbook and/or change its interpretation of any provision set forth in this handbook. Employees should not hesitate to speak to management if they have any questions about the company or its personnel policies and practices.

9 Section 9 - Receipt for Employee Handbook

I acknowledge that I have received a copy of the Needham Risk Management employee handbook dated **December 17, 2025**.

I understand that this handbook replaces any and all prior verbal and written communications regarding, but not limited to, Needham Risk Management's working conditions, policies, procedures, appeal processes, and benefits.

I understand that the working conditions, policies, procedures, appeal processes, and benefits described in this handbook are confidential and may not be distributed in any way nor discussed with anyone who is not an employee of Needham Risk Management.

I understand that the documentation provided in this handbook is provided for guidance and information only. The company reserves the right to interpret, modify, add or eliminate provisions of the handbook in order to comply with state, federal or local laws, rules or regulations or company policies, procedures and practices, with or without notice at any time.

I have read and understand the contents of this handbook and will act in accordance with these policies and procedures as a condition of my employment with Needham Risk Management.

I understand that if I have questions or concerns at any time about the handbook, I will consult the General Manager for clarification.

I also acknowledge that the handbook contains an employment-at-will provision that states:

- Either Needham Risk Management or I can terminate my employment relationship at any time, with or without cause, and with or without notice; and,
- That this employment-at-will relationship is in effect regardless of any other written statements or policies contained in this handbook, in any other Needham Risk Management documents, or in any verbal statements to the contrary.
- I agree to Needham Risk Management's Training and Responsibility Policy, specifically, I agree that if I voluntarily chose to leave the company within 6 months of completing a training, educational or licensing program paid for by the company, I will reimburse the company for 75% of the expenses paid by the company.
- I agree to Needham Risk Management's Conflicts of Interest Policy. I will not use the Company's intellectual property (including, but not limited to presentation materials, written programs, client contact list, strategic approaches) for personal benefit in a manner that is not beneficial to the Company.

Please read this Handbook carefully to understand these conditions of employment before completing acknowledgement of receipt.