



EMPLOYEE HANDBOOK

C.P. WARD, INC.
EMPLOYEE HANDBOOK

TABLE OF CONTENTS	2
INTRODUCTION	5
WELCOME	6
PREFACE	7
EMPLOYMENT PRACTICES	8
2.01 <u>EQUAL EMPLOYMENT OPPORTUNITY</u>	9
2.02 <u>STATEMENT OF RIGHTS UNDER THE NLRA</u>	10
2.03 <u>HARASSMENT AND DISCRIMINATION PREVENTION</u>	11
2.04 <u>WORKPLACE BULLYING</u>	19
2.05 <u>PREGNANCY ACCOMMODATION</u>	20
2.06 <u>LACTATION ACCOMMODATION</u>	22
2.07 <u>REPRODUCTIVE HEALTH DECISIONS</u>	23
2.08 <u>INDIVIDUALS WITH DISABILITIES</u>	24
2.09 <u>RELIGIOUS ACCOMMODATION</u>	25
2.10 <u>CODE OF ETHICS</u>	26
EMPLOYEE RELATIONS	29
3.01 <u>EMPLOYMENT ELIGIBILITY & WORK AUTHORIZATION</u>	30
3.02 <u>RECRUITMENT & PLACEMENT</u>	30
3.03 <u>EMPLOYMENT CLASSIFICATIONS</u>	31
3.04 <u>ORIENTATION PROGRAM</u>	32
3.05 <u>WORKING HOURS</u>	32
3.06 <u>PAY PRACTICES</u>	33
3.07 <u>ATTENDANCE</u>	37
3.08 <u>OPEN COMMUNICATION</u>	37
3.09 <u>SOLICITATION & DISTRIBUTION</u>	38
3.10 <u>STANDARDS OF CONDUCT</u>	39
BENEFIT PROGRAMS	41

<u>4.01</u>	<u>HOLIDAYS</u>	<u>42</u>
<u>4.02</u>	<u>BENEFIT TIME</u>	<u>42</u>
<u>4.03</u>	<u>BENEFITS</u>	<u>45</u>
<u>4.04</u>	<u>CONSOLIDATED OMNIBUS BUDGET RECONCILIATION ACT (COBRA)</u>	<u>46</u>
<u>4.05</u>	<u>DISABILITY LEAVE</u>	<u>48</u>
<u>4.06</u>	<u>NEW YORK PAID FAMILY LEAVE BENEFITS</u>	<u>49</u>
<u>4.07</u>	<u>FAMILY AND MEDICAL LEAVE ACT</u>	<u>53</u>
<u>4.08</u>	<u>BEREAVEMENT</u>	<u>59</u>
<u>4.09</u>	<u>BONE MARROW & BLOOD DONATION LEAVE</u>	<u>60</u>
<u>4.10</u>	<u>JURY DUTY & COURT ATTENDANCE</u>	<u>60</u>
<u>4.11</u>	<u>CRIME VICTIM LEAVE</u>	<u>61</u>
<u>4.12</u>	<u>DOMESTIC VIOLENCE VICTIM LEAVE</u>	<u>62</u>
<u>4.13</u>	<u>MILITARY LEAVE</u>	<u>63</u>
<u>4.14</u>	<u>VOTING LEAVE</u>	<u>65</u>
<u>4.15</u>	<u>VOLUNTEER FIREFIGHTER & AMBULANCE PERSONNEL LEAVE</u>	<u>66</u>
<u>4.16</u>	<u>PAID PRENATAL LEAVE</u>	<u>66</u>
<u>4.17</u>	<u>WORKERS' COMPENSATION</u>	<u>68</u>
<u>4.18</u>	<u>EMPLOYEE ASSISTANCE PROGRAM</u>	<u>69</u>

SAFETY POLICIES **70**

<u>5.01</u>	<u>SAFETY THROUGH TEAMWORK</u>	<u>71</u>
<u>5.02</u>	<u>ALCOHOL & DRUG-FREE WORKPLACE</u>	<u>73</u>
<u>5.03</u>	<u>WORKPLACE SEARCHES</u>	<u>75</u>
<u>5.04</u>	<u>BUILDING SECURITY</u>	<u>75</u>
<u>5.05</u>	<u>EMERGENCY EVACUATION</u>	<u>76</u>
<u>5.06</u>	<u>SMOKE-FREE AND TOBACCO FREE WORKPLACE</u>	<u>77</u>
<u>5.07</u>	<u>VIOLENCE IN THE WORKPLACE</u>	<u>77</u>
<u>5.08</u>	<u>PANDEMIC ILLNESS</u>	<u>79</u>
<u>5.09</u>	<u>AIRBORNE INFECTIOUS DISEASE EXPOSURE PREVENTION PLAN</u>	<u>81</u>

EMPLOYEE PROGRAMS & PROCEDURES **82**

<u>6.01</u>	<u>CLIENT RELATIONS</u>	<u>83</u>
<u>6.02</u>	<u>MEDIA RELATIONS</u>	<u>83</u>
<u>6.03</u>	<u>PROFESSIONAL ATTIRE</u>	<u>83</u>

<u>6.04</u>	<u>SUGGESTION PROGRAM</u>	<u>84</u>
<u>6.05</u>	<u>COMMUNICATIONS</u>	<u>84</u>
<u>6.06</u>	<u>PERSONAL CALLS & PERSONAL ELECTRONIC DEVICES</u>	<u>85</u>
<u>6.07</u>	<u>CORPORATE CREDIT CARDS</u>	<u>87</u>
<u>6.08</u>	<u>OUTSIDE EMPLOYMENT</u>	<u>87</u>
<u>6.09</u>	<u>SEVERE WEATHER</u>	<u>88</u>
<u>6.10</u>	<u>ELECTRONIC RESOURCES</u>	<u>89</u>
<u>6.11</u>	<u>BULLETIN BOARDS</u>	<u>91</u>
<u>6.12</u>	<u>CHANGES IN PERSONAL INFORMATION</u>	<u>91</u>
<u>6.13</u>	<u>PERSONNEL FILES</u>	<u>92</u>
<u>6.14</u>	<u>PROTECTION OF EMPLOYEE PERSONAL INFORMATION</u>	<u>93</u>
<u>6.15</u>	<u>SOCIAL MEDIA</u>	<u>95</u>
<u>6.16</u>	<u>TRAVEL TIME/BUSINESS EXPENSES</u>	<u>98</u>
<u>6.17</u>	<u>OPERATION OF VEHICLES FOR COMPANY BUSINESS</u>	<u>99</u>
<u>6.18</u>	<u>USE OF COMPANY EQUIPMENT AND RESOURCES</u>	<u>102</u>
<u>6.19</u>	<u>HOUSEKEEPING</u>	<u>103</u>
<u>6.20</u>	<u>PARKING</u>	<u>103</u>
<u>6.21</u>	<u>HATE SYMBOLS IN THE WORKPLACE</u>	<u>104</u>
<u>6.22</u>	<u>SHOULD YOU LEAVE US</u>	<u>105</u>
	<u>EMPLOYEE HANDBOOK RECEIPT ACKNOWLEDGEMENT</u>	<u>108</u>

SECTION ONE

INTRODUCTION

WELCOME

C. P. Ward, Inc. (CP Ward) serves residential, commercial, municipal, industrial, and transportation customers with integrity and expertise.

We believe each employee contributes directly to CP Ward growth and success. We hope you will take pride in being a member of our team.

This handbook was developed to describe our collective relationship and to outline the policies, programs, and benefits available to eligible employees. Please familiarize yourself with the contents of the employee handbook as soon as possible, for it will answer many questions about employment with CP Ward.

We hope your experience here at CP Ward will be challenging, enjoyable, and rewarding.

Ken Stewart
President

PREFACE

This Employee Handbook* outlines the human resources policies and benefit plans currently in effect at C. P. Ward, Inc. In this Employee Handbook, C. P. Ward, Inc. is also referred to as “CP Ward” or “Company.” Policies are revised or added periodically and are effective as of the date issued.

The statements regarding our Company’s policies, procedures and benefits are for information purposes only. They do not constitute a contract for employment, either expressed or implied. Our Company adheres to the principle of employment-at-will which preserves the right of either the employee or the employer to terminate the employment relationship at any time, with or without cause or notice. No manager or employee of CP Ward has any authority to enter into an agreement for any employment other than at will. Only the President has the authority to make any such agreement and then only if it is reduced to writing.

Important Information about Benefits

As our Company evolves, we will continue to review and revise these human resources policies and benefit programs. The Company reserves the right to alter, reduce or terminate any pay practices, policies, premium contributions, benefits and benefit plans, in whole or in part, at any time for any reason to the extent permissible by law. Any such change may affect retirees and beneficiaries, as well as active employees.

The benefit information found in this Employee Handbook is intended to provide an overview of the benefit plans. The actual benefits are controlled by the terms of the applicable plan documents and insurance policies. Questions regarding the interpretation of these plans will be answered in accordance with the actual plan documents and insurance policies, rather than the summaries contained in this Employee Handbook. Employees may obtain copies of these documents from Human Resources.

Disclaimers

This Employee Handbook will be interpreted to comply with all applicable federal, state, and local laws. As more fully described in the Statement of Rights Under the NLRA, nothing in this Employee Handbook is intended to unlawfully restrict an employee’s right to engage in any concerted activity protected by the National Labor Relations Act. If there is a conflict between the collective bargaining agreement and this Handbook, the provisions of the collective bargaining agreement are controlling for unionized employees.

*This Employee Handbook and its policies are effective January 2025, and supersede all other personnel manuals and personnel policies previously distributed by the Company. To avoid confusion, please discard any copies of previously published Employee Handbooks. To the extent that policies or procedures in this handbook conflict with an applicable collective bargaining agreement (“CBA”), the CBA supersedes the handbook and is to be followed.

SECTION TWO

EMPLOYMENT PRACTICES

2.01 EQUAL EMPLOYMENT OPPORTUNITY

CP Ward is committed to a policy of Equal Employment Opportunity with respect to all employees, interns and applicants for employment. Consistent with this commitment, our policy is to comply with all applicable federal, state and local laws concerning employment discrimination. Accordingly, the Company prohibits discrimination against qualified employees, interns and applicants in all aspects of employment including, but not limited to: recruitment, interviewing, hiring (or failure or refusal to hire), evaluation, compensation, promotion, job assignment, transfer, demotion, training, leaves of absence, layoff, benefits, use of facilities, working conditions, termination and employer-sponsored activities and programs, including wellness, social and recreational programs. Employment decisions will be made without regard to an applicant's, employee's or intern's actual or perceived: race (including traits historically associated with race, such as hair texture and protective hairstyles), color, creed, religion (including wearing attire, clothing or facial hair in accordance with the tenets of religion), sex (including pregnancy, childbirth or related medical conditions), transgender status, gender identity or expression, reproductive health decision-making of an employee or an employee's dependent(s), familial status, marital status, national origin, citizenship or immigration status (within legal constraints), physical or mental disability, genetic information (including predisposing genetic characteristics), age, veteran status, military status, sexual orientation, certain arrest or conviction records, domestic violence victim status, known relationship or association with any of these, and any other status protected by law.

MANAGEMENT RESPONSIBILITIES

All members of management are responsible for understanding the Company's commitment to this policy and ensuring this policy is carried out. Managers are responsible for immediately reporting and responding to a discrimination complaint. It is critical that any formal or informal reference to discrimination is taken seriously.

REASONABLE ACCOMMODATIONS

Consistent with our Individuals with Disabilities and Religious Accommodation policies, the Company will work to make reasonable accommodations for a qualified applicant, intern or employee with a known disability or arising out of an individual's sincerely held religious beliefs or practices, unless doing so would result in an undue hardship to the Company. Employees who require a reasonable accommodation due to a known disability arising out of a sincerely held religious belief or practice should refer to the applicable Company policies.

QUESTIONS AND COMPLAINTS

Questions regarding the administration of this policy or a complaint regarding Equal Employment Opportunity should be directed to the employee's manager or to Human Resources. Consistent with our policy on Harassment & Discrimination Prevention, the Company will promptly and thoroughly investigate all complaints. Confidentiality will be maintained to the greatest degree possible, consistent with the Company's obligation to thoroughly investigate the complaint.

January 2025

Any individual at any time, even after separation of employment, who feels this policy has been violated should immediately contact their manager or Human Resources.

If not satisfied with the resolution, an employee may pursue an appeal. Appeals will generally follow the steps outlined in the Open Communication policy.

NON-RETALIATION

It is the policy of CP Ward that any employee or applicant who makes or participates in the investigation of a discrimination complaint will not be retaliated against in any way. Employees, interns or applicants who feel they have been retaliated against for such activity should immediately contact Human Resources.

Anyone found to be engaging in any type of inappropriate conduct under this policy may be subject to disciplinary action, up to and including termination of employment.

2.02 STATEMENT OF RIGHTS UNDER THE NLRA

The policies contained in this Employee Handbook in no way prohibit employees from engaging in activities that are protected under applicable federal, state or local laws, including, but not limited to, any activity that is protected under Section 7 of the National Labor Relations Act (NLRA), including without limitation, employees right to engage in:

- Organizing a union to negotiate with their employer concerning their wages, hours, and other terms and conditions of employment;
- Forming, joining, or assisting a union, such as by sharing employee contact information; Talking about or soliciting for a union during non-work time, such as before or after work or during break times, or distributing union literature during non-work time, in non-work areas, such as parking lots or break rooms;
- Discussing wages and other working conditions with co-workers or a union;
- Taking action with one or more co-workers to improve working conditions by, among other means, raising work-related complaints directly with the employer or with a government agency, or seeking help from a union;
- Striking and picketing, depending on its purpose and means;
- Taking photographs or other recordings in the workplace, together with co-workers, to document or improve working conditions, except where an overriding employer interest is present;
- Wearing union hats, buttons, t-shirts, and pins in the workplace, except under special circumstances; and
- Choosing not to engage in any of these activities.

NO RETALIATION

CP Ward will not retaliate against an employee because they exercise their rights in accordance with this policy. Employees who have questions concerning this policy or feel they have been retaliated against for engaging in protected activities should contact Human Resources.

2.03 HARASSMENT AND DISCRIMINATION PREVENTION

CP Ward is committed to maintaining a workplace free from all forms of harassment and discrimination. . The Company prohibits unlawful harassment and discrimination against anyone, for any reason, including, but not limited to an individual's actual or perceived: race (including traits historically associated with race, such as hair texture and protective hairstyles), color, creed, religion (including wearing attire, clothing or facial hair in accordance with the tenets of religion), sex (including pregnancy, childbirth or related medical conditions), transgender status, gender identity or expression, reproductive health decision-making of an employee or an employee's dependent(s), familial status, marital status, national origin, citizenship or immigration status, physical or mental disability, genetic information (including predisposing genetic characteristics), age, veteran status, military status, sexual orientation, certain arrest or conviction records, domestic violence victim status, known relationship or association with any of these, and any other status protected by applicable law.

The purpose of this policy is for employees and other covered individuals to recognize harassment and discrimination and to know what action to take when it occurs. This policy is one component of CP Ward's commitment to a harassment and discrimination-free work environment where all individuals are treated with dignity and respect.

APPLICABILITY

This policy applies to all employees, applicants for employment, interns, whether paid or unpaid, anyone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in our workplace; collectively referred to as "covered individual(s)" throughout this policy.

All covered individuals conducting business in our workplace must refrain from engaging in unlawful harassment and discrimination.

NO TOLERANCE

Harassment, discrimination and retaliation of any kind is a violation of our policies, is unlawful, and may subject CP Ward to liability for harm to targets of harassment, discrimination and retaliation. Workplace harassment, discrimination and retaliation will not be tolerated at CP Ward. All covered individuals conducting business with CP Ward are required to conduct themselves in a manner that prevents sexual or other forms of harassment and discrimination in the workplace. Any individual covered by this policy who engages in workplace harassment, discrimination or retaliation may be subject to remedial and/or disciplinary action, up to and including termination.

Harassers may also be individually subject to liability and the Company or managers who fail to report or act on harassment may be liable for aiding and abetting such behavior. Employees of every level who engage in harassment, discrimination or retaliation,

including managers who engage in harassment, discrimination, or retaliation or who allow such behavior to continue, will be penalized for such misconduct.

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment is unacceptable. Sexual harassment is a form of sex discrimination that subjects an employee to inferior conditions of employment due to their sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender and is unlawful under federal, state and (where applicable) local law.

Sexual harassment is not limited to sexual contact, touching, or expressions of a sexually suggestive nature and may include any unwelcome conduct which is directed at an individual because of that individual's sex when:

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

There are two main types of sexual harassment:

- **Hostile Work Environment.** Behaviors that contribute to a hostile work environment may include but are not limited to words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also can consist of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which interfere with the recipient's job performance.
- **Quid Pro Quo.** Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

Any covered individual who feels harassed should report the harassment to Human Resources, so that any violation of this policy can be corrected promptly. Any harassing or discriminatory conduct, even a single incident, can be addressed under this policy.

EXAMPLES OF SEXUAL HARASSMENT

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

- Physical assaults of a sexual nature, such as:
 - Touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body;
 - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the victim's job performance evaluation, a promotion or other job benefits or detriments;
 - Subtle or obvious pressure for unwelcome sexual activities, including repeated requests for dates or romantic gestures.
- Sexually oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Gender stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular gender should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace(including visible areas of a virtual or remote workspace), such as:
 - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Sabotaging an individual's work;
 - Bullying, yelling, name-calling;
 - Intentional misuse of an individual's preferred pronouns; or
 - Creating different expectations for individuals based on their perceived identities.

DEFINITION OF OTHER UNLAWFUL HARASSMENT

The creation of an intimidating or hostile working environment, based on one or more of the above protected categories, constitutes unlawful harassment. Specific types of unlawful harassment, in addition to sexual harassment covered above, include, but are not limited to:

- Physical harassment refers to pushing, hitting, crowding, cornering or unwanted physical touching;
- Verbal abuse refers to verbal comments, including but not limited to jokes or the use of slurs or other offensive language regarding, or made because of, an

- individual's actual or perceived membership in one of the protected categories listed above;
- Written harassment refers to derogatory or degrading written comments regarding, or made because of, an individual's membership in one of the categories listed above. Specific examples include, but are not limited to e-mail, text messages, memos, notes, graffiti, other visual depictions or pictures, cartoons, drawing, videos;
 - Inappropriate, unwelcomed behaviors, such as offensive gestures and wearing clothes, jewelry, signage, etc. known to be offensive to particular protected classifications; and
 - Any other unwelcome conduct that has the purpose or effect of creating an intimidating, hostile, or offensive working environment as defined by law, or has the purpose or effect of unreasonably interfering with an individual's work performance or otherwise adversely affecting an individual's employment opportunities.

Unlawful harassment, whether it is physical, verbal or visual in nature, is a form of employee misconduct which undermines the integrity of the employment relationship within our Company.

WHO CAN BE A TARGET?

Harassers can be anyone in the workplace. Harassment can occur between any individuals, regardless of their sex or gender. New York Law all covered individuals. A perpetrator of workplace harassment can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client or visitor.

WHERE CAN HARASSMENT OCCUR?

Unlawful harassment is not limited to the physical workplace itself. It can occur while covered individuals are working remotely, traveling for business or at employer-sponsored events or parties. Calls, texts, emails, communications in virtual meeting platforms and messaging apps and social media usage by covered individuals can constitute unlawful workplace harassment, even if they occur away from the workplace premises and/or on personal devices (i.e., cellphones) or during non-work hours.

REPORTING HARASSMENT

In New York, harassment does not need to be severe or pervasive to be illegal. It can be any harassing behavior that rises above petty slights or trivial inconveniences. Any covered individual who has been subjected to behavior that may constitute unlawful harassment or discrimination is encouraged to report such behavior to their manager or to Human Resources. Anyone who witnesses or becomes aware of potential instances of workplace harassment or discrimination should report such behavior to their manager or to Human Resources.

Reports of workplace harassment or discrimination may be made verbally or in writing. The written complaint form is located in the back of the employee handbook as well as with the Human Resources department. All covered individuals are encouraged to use

this complaint form. Employees who are reporting potential harassment on behalf of another covered individual should use the complaint form and note that the complaint is being made on behalf of another covered individual.

Covered individuals who believe they have been a victim of workplace harassment or discrimination may also seek assistance in other available forums, as outlined in the Legal Protections and External Remedies section of this policy.

BYSTANDER INTERVENTION

Any employee witnessing harassing or discriminatory behavior as a bystander is encouraged to report it. A manager that is a bystander to these behaviors is required to report it.

To the extent in which a bystander feels safe and comfortable, they may interrupt the harassment by engaging with the individual being harassed and distracting them from the harassing behavior; asking a third party to help intervene in the harassment; documenting the incident; checking in with the person who has been harassed after the incident; or confronting the harassers and naming the behavior as inappropriate.

When confronting harassment, physically assaulting an individual is never an appropriate response.

MANAGEMENT RESPONSIBILITIES

All managers who receive a complaint or information about suspected workplace harassment or discrimination, observe what may be harassing or discriminatory behavior or for any reason suspect that harassment or discrimination is occurring, are **required** to report such suspected harassment or discrimination to Human Resources.

In addition to being subject to discipline if they engaged in harassing or discriminatory conduct themselves, managers will be subject to discipline for failing to report suspected workplace harassment or discrimination or otherwise knowingly allowing workplace harassment or discrimination to continue.

Managers will also be subject to discipline for engaging in any retaliation.

COMPLAINTS AND INVESTIGATIONS

All complaints, information, or knowledge of suspected workplace harassment or discrimination will be investigated. Investigations will be thoroughly conducted in a prompt and timely manner, and will be confidential to the extent possible.

All persons involved, including complainants, witnesses and alleged harassers, will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any covered individual may be required to cooperate as needed in an investigation of suspected workplace harassment or discrimination. CP Ward will not tolerate retaliation

against covered individuals who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations will generally be conducted in accordance with the following steps:

- Upon receipt of complaint, Human Resources will conduct an immediate review of the allegations, assess the appropriate scope of the investigation, and take any interim actions, as appropriate. If the complaint is verbal, the individual will be encouraged to complete the "Complaint Form" in writing. If the complainant chooses not to complete the Complaint Form, Human Resources will prepare a complaint form or equivalent documentation based on the complainant's verbal report.
- When applicable, Human Resources may request, review and preserve documents, relevant to the allegations, such as emails, phone records or other electronic communications.
- Human Resources will interview all parties involved, including any relevant witnesses.
- Human Resources will prepare written documentation of the investigation (such as a letter, memo or email), which may contain the following:
 - A list of all documents reviewed, along with a detailed summary of relevant documents;
 - A list of names of those interviewed, along with a detailed summary of their statements;
 - A timeline of events;
 - A summary of prior relevant incidents, reported or unreported; and
 - The basis for the decision and final resolution of the complaint, together with any corrective actions action(s).
- Written documentation and associated documents will be maintained by the Company in a secure and confidential location.
- Following the investigation, Human Resources will promptly notify the complainant and the individual(s) about whom the complaint was made that the investigation has been completed and implement any corrective actions identified in the written document.

CORRECTIVE ACTION

If a report of workplace harassment or discrimination is found to be valid, immediate and appropriate corrective action will be taken. Covered individuals who violate this policy, including the provision against retaliation, will be subject to disciplinary action, up to and including termination. This determination will be based on all the facts of the case.

NON-RETALIATION

CP Ward will not tolerate retaliation against anyone who, in good faith, complains or provides information about suspected harassment or discrimination.

Unlawful retaliation can be any action that could discourage an employee from coming forward to make or support a workplace harassment claim including, but not limited to, being discharged, disciplined, discriminated against, having their personnel file disclosed,

except where such disclosure is permitted or required by applicable law, or otherwise subject to adverse employment action. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

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

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

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

LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Harassment and discrimination based on a protected class is against the law. The internal process outlined in this policy is one way for covered individuals to report harassment and discrimination. Covered individuals may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, legal advice from an attorney may be sought.

New York State Division of Human Rights (DHR)

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

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

Complaining internally to CP Ward does not extend the time to file with DHR or in court. The three years are counted from the date of the most recent incident of harassment.

An attorney is not needed to file a complaint with DHR, and there is no cost to file with DHR.

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

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400, www.dhr.ny.gov.

Go to dhr.ny.gov/complaint for more information about filing a complaint. The website has a digital complaint process that can be completed on your computer or mobile device, in addition to, a complaint form that can be downloaded, filled out, and mailed to DHR as well as a form that can be submitted online. The website also contains contact information for DHR's regional offices across New York State. The DHR also maintains a toll-free hotline that accepts complaints and provides limited assistance and counseling regarding workplace sexual harassment. This hotline can be reached at **1-800- HARASS3(427-2773)**.

United States Equal Employment Opportunity Commission (EEOC)

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

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

If an employee believes that they have been discriminated against at work, they can file a "Charge of Discrimination." The EEOC has district, area and field offices where complaints can be filed. Contact the EEOC by calling (800) 669-4000 (800) 669-6820 (TTY), visiting their website at <https://www.eeoc.gov/or> via email at info@eeoc.gov.

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

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file

January 2025

complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, NY, NY; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Contact the Local Police Department

If the harassment involves physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Those wishing to pursue criminal charges may contact the local police department.

CONCLUSION

All covered individuals have the right to a workplace that is free from harassment and discrimination. This policy should be considered applicable to all protected classes under federal, state and local law.

Employees who have questions regarding this policy should contact Human Resources.

2.04 WORKPLACE BULLYING

The purpose of this policy is to communicate to all employees and managers that CP Ward will not tolerate bullying behavior in the workplace.

BULLYING PROHIBITED

CP Ward defines bullying as repeated activity that is meant to diminish or disempower another individual and any use of aggressive, hostile, abusive, harassing or unreasonable conduct against another individual. It occurs when a person uses strength or influence to intimidate another, typically to force a desired act or result.

Bullying may be intentional or unintentional. Bullying may be intentional or unintentional and may consist of threats, verbal conduct or any action intended to interfere with an individual's work.

Bullying at work may take the form of actions that are:

- Threatening, aggressive or intimidating;
- Abusive, insulting or offensive;
- Cruel or vindictive; or
- Humiliating, degrading or demeaning.

It is the effect of the behavior on the individual that is of the utmost importance.

EXAMPLES

CP Ward considers the following types of behavior examples of bullying:

Verbal Bullying

Slandering, ridiculing or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.

Physical Bullying

Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.

Gesture Bullying

Nonverbal threatening gestures; glances that can convey threatening messages.

Exclusion

Socially or physically excluding or disregarding a person in work-related activities.

Electronic Bullying

Threatening, intimidating or offensive text messages, social media posts, etc. The examples are not intended to be an exclusive list of the types of behavior that would be considered bullying.

ADDITIONAL INFORMATION

Employees who feel they have been bullied should contact their manager or Human Resources. Reports of bullying will be investigated. Employees found in violation of this policy will be subject to disciplinary action, up to and including termination.

2.05 PREGNANCY ACCOMMODATION

The Company will not discriminate against an employee or applicant with known physical or mental limitations related to the pregnancy, childbirth or pregnancy-related medical conditions who requests an accommodation due to pregnancy, childbirth and related conditions or who requests an accommodation due to pregnancy, childbirth or pregnancy-related medical conditions unless the accommodation would impose an undue hardship on the operation of the Company.

REASONABLE ACCOMMODATIONS

Employees and applicants for employment may request a reasonable accommodation for pregnancy-related conditions, including, but not limited to, lactation. For purposes of this policy, a "pregnancy-related condition" is a medical condition related to pregnancy or childbirth that inhibits the exercise of a normal bodily function or is demonstrable by medically accepted clinical or laboratory diagnostic techniques but does not prevent the employee from performing their job functions in a reasonable manner, with or without a reasonable accommodation. Reasonable accommodations may include but are not limited to: providing an accessible worksite; acquiring or modifying equipment; job restructuring and modifying work schedules provided, however, that such actions do not impose an undue hardship on the business.

The Company will provide a reasonable accommodation that would enable the employee or applicant to perform their job functions in a reasonable manner, unless the accommodation would impose an undue hardship on the Company's business operations.

Employees and applicants affected by pregnancy, childbirth or related medical conditions may also be entitled to a reasonable accommodation under the federal Pregnant Workers Fairness Act (PWFA). The Company will comply with all legal requirements under federal and state law, including providing greater or different benefits than those indicated in this policy.

REQUESTING A REASONABLE ACCOMMODATION

Employees or applicants who would like to request a reasonable accommodation under this policy should contact Human Resources, preferably specifying in writing what barriers or limitations prompted the request. Human Resources will evaluate the information provided regarding any reported or apparent barriers or limitations and will then communicate with the applicant or employee and engage in an interactive process to determine the nature of the limitation and what, if any, reasonable accommodation(s) may be appropriate. If, through this interactive process, the Company identifies a reasonable accommodation that does not impose an undue hardship on the operation of the Company's, the Company will make that accommodation.

Employees who wish to request time away from work to accommodate a limitation related to pregnancy, childbirth or a pregnancy-related medical condition should contact Human Resources. However, the Company will not require a qualified employee to take leave if another reasonable accommodation can be provided.

CERTIFICATION REQUIREMENTS

To the extent permitted by federal or state law, employees may be required to provide medical or other information that is necessary to verify the existence of the pregnancy-related condition or that is necessary for the Company's consideration of a reasonable accommodation. Such medical information will be kept confidential and disclosed only as permitted by law.

NO DISCRIMINATION AND NO RETALIATION

The Company prohibits discrimination on the basis of pregnancy, childbirth or related medical conditions. The Company also will not interfere with any individual's rights under federal and state law or take any adverse action against a qualified applicant or employee because they request or use reasonable accommodations in accordance with this policy, report or oppose discrimination under federal or state law, or participate in a proceeding involving an alleged violation of federal or state law. Individuals who believe they have been subjected to, or believe that another individual has been subjected to, prohibited discrimination or retaliation should report it immediately to Human Resources.

ADDITIONAL INFORMATION

Employees or applicants for employment who have questions about this policy or who wish to request a reasonable accommodation under this policy should contact Human Resources. Employees who need reasonable break time to express breast milk for their

January 2025

child should consult the Company's Lactation Accommodation policy and the Policy on the Rights of Employees to Express Breast Milk in the Workplace which is available from Human Resources.

2.06 LACTATION ACCOMMODATION

In accordance with New York law, all employees have the right to express milk in the workplace.

LACTATION BREAKS

The Company will provide nursing employees with up to 30 minutes of paid break time to express milk each time the employee has a reasonable need to do so for up to three years following the birth of a child.

Nursing employees can also take time to express milk during their regularly scheduled meal and rest breaks.

Employees will be allowed to take longer unpaid breaks if needed. Non-exempt employees, whose lactation break exceeds 30 minutes may be granted additional unpaid lactation break time beyond the 30 minutes of paid time. Exempt employees will receive their full salary in accordance with federal and state law.

Employees are not required to make up time taken for lactation breaks.

Employees who work remotely have the same rights to paid lactation breaks, as all other employees who perform their work in-person.

LACTATION ROOM

Employees who work onsite have the right to request a lactation room for the purpose of expressing milk. Employees will be informed as soon as practicable when a lactation room or location has been designated. The lactation room will be a well-lit, sanitary place, other than a restroom or toilet stall, that is shielded from view, free from intrusion and in reasonable proximity to the employee's work area. The lactation room will include an electrical outlet, a chair, a working surface area on which to place a breast pump and other personal items, nearby access to running water and access to refrigeration for the purpose of storing the expressed milk. Please note that the Company is not responsible for ensuring the safekeeping of expressed milk stored in any refrigerator on its premises. The employee is required to store all expressed milk in closed containers, regardless of the method of storage, and should remove such milk at the end of the workday.

REQUESTING USE OF THE LACTATION ROOM

To request use of a lactation room, employees are to contact Human Resources. The Company will respond to the employee's request within a reasonable amount of time, not to exceed five business days. Employees should contact Human Resources with any follow-up inquiries.

A room identified for use as a lactation room may also be used for other purposes. However, an employee's need of a room for lactation breaks will be prioritized, and during times when an employee is using the room as a lactation room, that will be its sole function. When two or more employees need to use the room for lactation purposes or in connection with other accommodations, they should contact and work together with Human Resources to schedule room usage cooperatively and in a way that accommodates all affected employees. Employees who have questions or concerns related to lactation room scheduling conflicts can contact Human Resources.

EMPLOYEE'S RESPONSIBILITY

Employees are required to provide reasonable advance notice to the Company that they intend to take breaks for expressing milk upon returning to work following the birth of the child. If providing the requested lactation room will place an undue hardship on the Company's operations, the Company will engage in reasonable efforts to provide a private room or location, other than a restroom or toilet stall, that is in close proximity to the work area where an employee can express milk in private.

NO RETALIATION AND NO DISCRIMINATION

Employees who believe the Company has failed to comply with the requirements of this policy and federal or state law should immediately notify Human Resources. The Company will not retaliate or discriminate against an employee because they exercise their rights under this policy or file a complaint or institute any proceeding under or related to New York State law or the federal Fair Labor Standards Act.

ADDITIONAL INFORMATION

Pursuant to New York State requirements, a Policy on the Rights of Employees to Express Milk in the Workplace that further explains your rights under New York State law will be provided at hire, annually after hire, and whenever an employee returns to work following the birth of a child and is available from Human Resources.

2.07 REPRODUCTIVE HEALTH DECISIONS

CP Ward complies with state law regarding reproductive health decision as outlined in this policy.

NON-DISCRIMINATION/NO RETALIATION

The Company will not access an employee's personal information regarding the employee's or the employee's dependent's reproductive health decision making, discriminate or take any retaliatory action against any employee with respect to compensation, terms, conditions, or privileges of employment because of or on the basis of the employee's or their dependent's reproductive health decision making, or require an employee to sign a waiver or other document which purports to deny an employee the right to make their own reproductive health care decisions. For purposes of this policy "reproductive health decision making" includes, but is not limited to, a decision to use or access a particular drug, device, or medical service. In addition to reporting any alleged violations of this policy to the Company, employees may also choose to pursue legal

January 2025

remedies by initiating a civil action in court for damages, injunctive relief, reinstatement, and/or liquidated damages.

No employee will be subject to retaliation or discipline by the Company as a result of making or threatening to make a complaint to the Company, a co-worker, or a public body, that rights guaranteed under applicable law have been violated; causing to be instituted any proceeding alleging violations of applicable law; or providing information to, or testifying before, any public body conducting an investigation, hearing, or inquiry into any alleged violation by the Company of applicable law, rule, or regulation.

ADDITIONAL INFORMATION

Employees who feel they have been subjected to discrimination or retaliation on the basis of their reproductive health decision-making, or that of a dependent, or to any other violation of this policy, should contact Human Resources.

2.08 INDIVIDUALS WITH DISABILITIES

CP Ward complies with the Americans with Disabilities Act (ADA) and New York State Human Rights Law, which make it unlawful to discriminate in employment against a qualified individual with a disability. The Company prohibits discrimination against employees and applicants with disabilities in all aspects of employment. Our Company's commitment to this policy includes making reasonable accommodations to otherwise qualified persons with disabilities to enable them to perform the essential functions of their jobs, unless doing so would pose an undue hardship on our business, would pose a direct threat of substantial harm to the employee or others, or is otherwise not required by applicable law.

OUR COMMITMENT

An employee or applicant in need of a reasonable accommodation should make the Company aware of their request by notifying Human Resources. The Company will work with each individual to define their job-related or application-related needs and to try to accommodate those needs.

QUALIFIED INDIVIDUALS WITH DISABILITIES

Qualified individuals with disabilities are defined as individuals with disabilities who can perform the essential functions of the job in question with or without reasonable accommodation. The term "disability" is defined by applicable law.

REASONABLE ACCOMMODATION

A reasonable accommodation is any change or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to perform the essential functions of the job, and that does not pose an undue hardship for the Company or create a direct threat to health or safety.

When requesting an accommodation, employees are required to notify Human Resources of the need for the accommodation. The Company may ask for medical documentation

January 2025

supporting the need for an accommodation, and all supporting documentation should be returned as quickly as possible to prevent a delay in the accommodation process.

Requests for a reasonable accommodation for a medical condition and any supporting documentation will be treated as confidential, maintained in a file separate from an employee's other personnel documents and disclosed only as permitted by applicable law.

DETERMINING APPROPRIATE ACCOMMODATIONS

Frequently, when a qualified individual with a disability requests a reasonable accommodation, the appropriate accommodation is easily agreed upon. The individual may recommend an accommodation based on their life or work experience. The ultimate decision as to whether a particular accommodation will be made rests with the Company. When the appropriate accommodation is not obvious, the Company may assist the individual in identifying one. If more than one accommodation will enable the individual to perform the job, the Company reserves the right to choose which accommodation it will make.

Employees who feel they have been unreasonably denied an accommodation should contact the President. Employees with questions concerning this policy should contact Human Resources.

2.09 RELIGIOUS ACCOMMODATION

CP Ward will provide reasonable accommodation for employees' religious beliefs, observances and practices when a need for such accommodation is identified, and reasonable accommodation is possible.

RELIGIOUS ACCOMMODATION

A reasonable accommodation is one that eliminates the conflict between an employee's religious beliefs, observances or practices and the employee's job requirements, without causing undue hardship on the Company's operations.

The Company has developed an accommodation process to assist employees and management through this process, by establishing a system of open communication between employees and the Company to discuss conflicts between religion and work and to take action to provide reasonable accommodation for employees' needs.

Any employee who perceives a conflict between job requirements and a religious belief, observance or practice should bring the conflict and their request for accommodation to the attention of Human Resources to initiate the accommodation process. The Company asks that accommodation requests be made in writing, and in the case of schedule adjustments, as far in advance as possible.

INTERACTIVE DIALOGUE

Once the employee has submitted their request for an accommodation, CP Ward will evaluate the request by meeting with the employee to discuss the request and propose a reasonable accommodation. The manager and/or Human Resources will be responsible

January 2025

for implementing the accommodation. If the employee rejects the proposed accommodation, the employee may lodge an appeal pursuant to CP Ward's Open Communication policy.

NO RETALIATION AND NO DISCRIMINATION

CP Ward will not retaliate or otherwise discriminate against an employee or applicant because they request an accommodation in accordance with this policy. Employees who have questions concerning this policy or feel they have been unreasonably denied an accommodation should contact Human Resources.

2.10 CODE OF ETHICS

CP Ward's code of ethics is dependent upon our core values maintaining ethical standards and the personal integrity of every individual in our Company. Each employee of the Company is required to ensure that they and their family members do not improperly benefit personally from the employee's position as an employee for the Company. For this reason, it is of paramount importance that we always conduct our day-to-day activities in an ethical and responsible manner.

CONFLICT OF INTEREST

While we acknowledge that employees may have pursuits separate from their work at the Company, employees must refrain from participating in any activity or business venture which could conflict with the interests of CP Ward and their job duties and responsibilities with CP Ward. Specifically, employees may not accept personal payment or other benefits from any supplier, vendor or clients of the Company, nor should they take any action as a representative of the Company for personal gain. Employees also may not accept a second job with a client, competitor, vendor or supplier of the Company where there is an actual or perceived conflict as outlined in our Outside Employment policy.

PROPRIETARY INFORMATION

In working at CP Ward, employees may learn things about our Company and our clients' operations which are proprietary or confidential, and the Company has a legitimate and substantial business interest in maintaining the confidentiality of such information. Every employee of the Company has a professional and ethical responsibility to treat this information as privileged, and to ensure such information is not improperly or accidentally disclosed. Except as required in the performance of their duties for the Company, employees may not use or disclose any proprietary information such as strategic and business or operational plans, pricing lists, sales and profit data, funding sources, marketing strategies, database systems, trade secrets, clients' supplier or vendor lists, and/or clients' supplier or vendor contracts to anyone who does not work for us or have a need to know the information.

Additionally, employees who have the following information by virtue of the performance of their job responsibilities should not disclose such information for any reason, except as required to complete job duties, without the permission of the employee at issue: Social Security Numbers, dates of birth, driver's license or resident identification numbers,

January 2025

financial accounts, credit or debit card numbers, and security and access codes or passwords that would permit access to medical, financial or other legally protected information.

Confidential information does not include information lawfully acquired by non-management employees about wages, hours or other terms and conditions of employment, if used by them for purposes protected by Section 7 of the National Labor Relations Act, such as joining or forming a union, engaging in collective bargaining or engaging in other concerted activity for their mutual aid or protection. Confidential Information also does not include conduct that was, or that an employee reasonably believes to be illegal; conduct that is recognized as against a clear mandate of public policy; or the existence of a non-confidential settlement involving any such conduct.

Upon termination of employment, employees must return and not retain any duplicates of all Company property and all copies of documents, notes, flash drives and other repositories containing proprietary or confidential information such as pricing lists, invoices, marketing methods, database systems, financial information, employee lists and all other information that is not general public knowledge relating to CP Ward except as otherwise required to retain pursuant to a legal hold notice.

RECEIVING AND GIVING GIFTS

Employees should avoid situations that could create an actual or perceived conflict of interest, or that could otherwise hinder an employee's ability to perform their job in an honest and ethical manner. To this end, employees may not accept substantial gifts, favors or excessive business entertainment from clients, vendors or suppliers. A gift, favor or entertainment is considered substantial or excessive if it might influence an employee's business relationship with the donor. Generally, substantial gifts or favors are defined as having a value of \$25 or more and should be reported to the employee's manager.

EMPLOYEE'S RESPONSIBILITY

Employees are responsible for promptly reporting any violation or suspected violation of these guidelines on conflicts of interest, proprietary information, gift giving and receiving, or any violation or suspected violation of any other Company policy to Human Resources or any other member of management. Violations of this policy are subject to disciplinary action, up to and including termination of employment and, if applicable, legal action. The Company protects those employees from retaliation who in good faith report possible inappropriate, unprofessional, illegal or unethical actions. Any employee who believes they have been retaliated against in violation of this policy should notify Human Resources immediately. Individuals who engage in any retaliation in contravention of this policy are subject to disciplinary action in accordance with the Company's Standards of Conduct policy.

NO RETALIATION

The Company protects those employees from retaliation who in good faith report possible inappropriate, unprofessional, illegal or unethical actions. Any employee who believes they have been retaliated against in violation of this policy should notify Human Resources immediately. Individuals who engage in any retaliation in contravention of this

policy are subject to disciplinary action in accordance with the Company's Standards of Conduct policy.

ADDITIONAL INFORMATION

Violations of this policy are subject to disciplinary action, up to and including termination of employment and, if applicable, legal action.

Employees should meet with their manager if they have questions regarding the application of this policy.

SECTION THREE

EMPLOYEE RELATIONS

3.01 EMPLOYMENT ELIGIBILITY & WORK AUTHORIZATION

CP Ward is committed to employing only individuals who are authorized to work in the United States and who comply with applicable immigration and employment law.

EMPLOYMENT ELIGIBILITY AND WORK AUTHORIZATION

As a condition of employment, every individual must provide satisfactory evidence of their identity and legal authority to work in the United States within three business days of commencing employment. If the employee cannot verify their right to work in the United States within three business days of employment, the Company will be required to terminate employment immediately.

Employees whose immigration status, employment authorization or employment authorization documents expire should file the necessary application or petition well in advance to ensure they maintain continuous employment authorization and valid employment authorization documents. It is the employees' responsibility to ensure that their employment authorization documents remain valid at all times. The Company will conduct reverification where required to do so by law. Employees with questions or who are seeking more information on immigration law issues are encouraged to contact Human Resources. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

3.02 RECRUITMENT & PLACEMENT

Our Company recruits and selects individuals for employment on the basis of merit, qualification and competency without regard to all legally protected classes. All job offers are contingent upon the applicant providing proof of legal authorization to work at the Company.

JOB POSTING

Whenever possible, we seek first to fill job openings with qualified applicants from within our Company. Notices of job vacancies are posted with various career websites including, but not limited to Indeed, ZipRecruiter and LinkedIn. Employees should notify their immediate manager and the Director of Workforce Development if they would like to be considered for a different position within our Company. Employees must be employed for at least six (6) months in their current position before being eligible to request a transfer or promotion.

INTRODUCTORY PERIOD

The performance of new employees will be evaluated at the end of a 90-day introductory period. Successful completion of the introductory period does not guarantee employment

for any period of time thereafter, and does not affect the employee's employment-at-will status during or after the introductory period.

3.03 EMPLOYMENT CLASSIFICATIONS

Employees of our Company are employed based on the classifications detailed below. CP Ward offers different employment classifications in order to meet staffing and business requirements and accommodate employee needs and schedule preferences.

FULL-TIME

Employees in this category are regularly scheduled to work at least 30 hours per week and receive benefits based on position, length of service and scheduled hours.

PART-TIME

Employees in this category are regularly scheduled to work 29 hours or less per week and receive statutory and bereavement benefits only.

TEMPORARY/SEASONAL

Employees in this category perform a function for a specified period of time and the length of their employment is limited due to the nature of the job or availability of the individual. Benefit eligibility for these employees will be based upon the number of hours worked in a week and will be commensurate to the eligibility requirements to the classifications listed above.

ADDITIONAL CLASSIFICATIONS

All positions, regardless of the number of hours required, are classified as either exempt or non-exempt for overtime and minimum wage requirements based on the nature of the job duties and amount of wages.

Exempt Employees

Exempt employees are those for whom no minimum wage and/or overtime requirements are required. These employees are paid a salary which is intended to compensate them for all hours worked, which may fluctuate on a weekly basis.

Non-Exempt Employees

Non-exempt employees are those who must be paid at least the federal minimum wage for all hours worked and provided with overtime pay at one and one-half times the employee's regular rate of pay for all hours worked over 40 hours in a workweek. Non-exempt employees are also eligible for spread of hours/split shift and call-in pay under New York law.

3.04 ORIENTATION PROGRAM

People are the core of our mission at CP Ward. To help get new employees off to a good start in our Company, an orientation program will be scheduled during the first week on the job.

DURING THE FIRST FEW DAYS

An appointment will be scheduled for new employees to meet with Human Resources to explain benefits, answer questions and help employees complete the payroll and benefit forms.

Human Resources gives the new employee a tour of our facility and introduces them to co-workers. Their manager will then explain general expectations for performance and behavior and begins training them on specific job requirements. It is important for employees to read our Employee Handbook, as it will answer many questions about our Company and its personnel policies.

EMPLOYEE RESPONSIBILITIES

During the first few days of employment, new employees are expected to promptly and accurately complete a number of employment-related forms and documents. Their manager is available to answer questions or to assist new employees with any procedures, subjects or issues affecting their job or employment relationship.

THROUGHOUT THE EARLY WEEKS

Throughout the first few weeks, employees will be given on-the-job training. During this time employees should gain a full understanding of their job responsibilities and our Company's standards for their position. Managers are anxious to help in any way they can, so employees should not hesitate to ask questions.

3.05 WORKING HOURS

Our Company observes a 40-hour workweek. Time records are kept for each employee showing the hours worked each week.

WORKWEEK

Due to the nature of our business, workdays and hours may vary with the job. While most employees will have a regular schedule, hours of work may change or be extended based on operational needs. Our standard workweek consists of eight (8) hours per day, five (5) days per week.

MEAL BREAK

Employees working at least a six-hour workday, which extends over the noon meal break (11 a.m. to 2 p.m.), are entitled to a 30-minute meal break to be taken between 11 a.m. and 2 p.m. Employees who start their workday before 11 a.m. and continue after 7 p.m.

January 2025

are entitled to a 30-minute noon meal break and an additional 20-minute break between 5 p.m. and 7 p.m.

An uninterrupted meal break lasting at least 30 minutes will be unpaid for non-exempt employees. Longer meal breaks may be allowed, subject to managerial approval. Exempt employees are paid for meal breaks.

Employees may not take a shorter meal break or skip a meal break to leave early.

If for any reason an employee's meal break is interrupted, the employee must notify their manager and the time should be recorded as worked. The employee will be paid for the time and will receive an uninterrupted meal break as soon as practicable. Employees should contact their manager if they have any questions regarding the meal break.

ADDITIONAL BREAKS

Employees receive two (2) additional 15-minute paid breaks each day.

TIME RECORDS

Non-exempt employees are required to record their hours worked and any absences on a time sheet and give it to their supervisor at the end of the pay period. Time sheets for field employees are due in the payroll department no later than noon on Tuesday, and office employee time sheets are due into the payroll department no later than noon on Monday. Employees are prohibited from engaging in off-the-clock work or unrecorded work.

Non-exempt employees are also required to record the beginning and end of meal periods. Under no circumstances should an employee record time for another employee. Should an employee forget to record their time, the employee should notify their manager, who will make the appropriate notations in the timekeeping system.

3.06 PAY PRACTICES

CP Ward is committed to a policy of fair and equitable compensation for all employees.

WAGE AND SALARY PROGRAM

Wage rates are assigned to each job based on job requirements and the economic conditions of the Company and the marketplace, as well as each employee's qualifications, skills and abilities. The Company endeavors to comply with all federal, state and local laws with respect to the payment of wages.

MERIT INCREASES

Pay increases may be provided when an employee demonstrates improvement or outstanding performance in their job. When reviewing pay increases, the Company considers business profitability, an employee's individual work performance and other economic factors. All merit increases are provided at the sole discretion of the Company.

PAYDAY

Employees are paid weekly on Friday and Supervision is paid biweekly. If payday falls on a holiday, employees will ordinarily be paid on the day before the holiday.

PAYROLL

Employees have the option of being compensated by check or direct deposit. Human Resources answers questions regarding compensation options.

GARNISHMENTS

A court may order the Company to garnish amounts directly from an employee's paycheck. The Company is required to withhold the amount indicated in the garnishment from the employee's paycheck in accordance with federal, state and local law.

OVERTIME

When operating requirements cannot be met during regular work hours, employees may be scheduled to work overtime hours. When possible, advance notification of these mandatory assignments will be provided.

Non-exempt employees will be paid one and one-half times their regular rate of pay for all hours worked over 40 hours in a workweek. Paid time off is not counted as hours worked when calculating overtime.

For purposes of calculating overtime, the Company's seven-day workweek begins on Sunday and ends on Saturday.

Non-exempt employees are paid one and one-half times their regular hourly rate of pay for hours worked on a company-designated holiday. All overtime work must receive the manager's prior authorization.

Failure to work assigned overtime, or working unauthorized overtime may result in disciplinary action, up to and including termination.

OUTSIDE WORK ACTIVITIES

Unless pre-approved by their manager, non-exempt employees are prohibited from performing work activities during non-working hours. This includes, but is not limited to, accessing electronic communication through cell phones, text messages and emails for work-related purposes and performing preparatory work outside of regular work hours. Time spent accessing work-related electronic communication outside of regular work hours or performing any other work during non-working hours must be pre-approved by the manager. Any such time, regardless of whether it has been approved or not, must be recorded and reported as time worked in the Company's time system.

TRAVEL/EXPENSE REIMBURSEMENT

Employees will be reimbursed for pre-authorized expenses, such as: Company-related travel mileage, hotel expenses, airfare or other business expenses incurred on behalf of CP Ward. Employees will be reimbursed for their mileage at the Company's current reimbursement rate. In addition to obtaining pre-approval, the employee must complete a travel/expense reimbursement form, attach any receipts, and submit to their manager.

January 2025

OVERPAYMENTS

In the event an employee is overpaid due to a mathematical or clerical error, CP Ward will proceed to recoup the overpayment via wage deductions in accordance with the New York State Labor Law. Employees who become aware of an overpayment must notify their manager immediately. For more information, employees should contact their manager or Human Resources.

POLICY FOR DEDUCTIONS FROM WAGES

Employee paystubs itemize deductions made from gross earnings. The Company is required by law to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions may also include any court-ordered garnishments. Pay stubs also itemize any voluntary deductions such as an employee's portion of health, dental or vision insurance premiums and/or voluntary contributions to a 401(k), to the extent applicable. If applicable, paystubs will also differentiate between regular and overtime pay received.

It is our policy to comply with the salary basis requirements of the Fair Labor Standards Act (FLSA) and applicable state law. In turn, managers are prohibited from making any improper deductions from the salaries of exempt employees or from the wages of any employee that are not consistent with federal and state wage and hour laws.

PERMITTED DEDUCTIONS FROM EXEMPT EMPLOYEE'S PAY

Employees who are classified as exempt must record absences from work equating to four (4) or more hours for reasons such as use of benefit time.

Exempt employees are paid on a salary basis. This means the employee regularly receives a predetermined amount of compensation each pay period, which cannot be reduced because of variations in the quality or quantity of the employee's work. In general, an exempt employee will receive their salary for any week in which the employee performs any work, regardless of the number of days or hours worked.

Under federal and state law, an exempt employee's salary may be subject to certain deductions. For example, absent contrary state law requirements, an exempt employee's salary can be reduced as either partial-day or full-day deductions for the following reasons:

- Full-day absences for personal reasons other than sickness or disability.
- Full-day absences for sickness or disability, if the employee has exhausted or is not yet eligible for paid time off under a bona fide policy or plan that provides compensation for salary lost due to illness.
- Full-day disciplinary suspensions for infractions of written policies and procedures.
- Penalties imposed in good faith for infractions of safety rules of major significance.
- Unpaid leave taken under the Family and Medical Leave Act (if applicable).
- To offset amounts received as jury and witness fees or military pay.

- The first or last week of employment when an employee works less than a full week.
- Any full workweek in which an employee does not perform any work.

In a workweek in which an exempt employee performs any work, the employee's salary will not be reduced for any of the following reasons:

- Partial day absences.
- Absence on a scheduled workday in which the Company has decided to close the facility at which an employee is scheduled to work and has not designated an alternate work site.
- Absences for jury duty, attendance as a witness or military leave, except that the Company may offset the employee's salary based on the received as jury or witness fees or military pay.
- Any other deductions prohibited by federal or state law.

Please note: It is not an improper deduction to reduce an employee's accrued benefit time off for full- or partial-day absences.

It is Company policy to comply with the salary basis requirements of the Fair Labor Standards Act (FLSA) and applicable state law. The Company prohibits any deductions from pay that violate the FLSA or applicable state law.

REPORTING IMPROPER DEDUCTIONS OR OTHER ERRORS

Employees should immediately contact their manager or Human Resources with questions about deductions or to report improper deductions and/or errors. Employees will not be retaliated against for making a complaint.

Reports of improper deductions or other errors will be promptly investigated. If it is determined that an improper deduction or other error has occurred, the employee will be promptly reimbursed.

It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable federal and state laws. To ensure accurate pay and proper deductions for all time worked, employees must correctly record all work time. Additionally, employees should promptly review their paychecks to identify and report all errors.

DISCUSSION OF WAGES

No employee is prohibited from inquiring about, discussing or disclosing their wages or the wages of another employee, if voluntarily disclosed by that employee. Employees are not required to disclose their wages to anyone.

This policy does not apply to disclosure of other employees' wage information by employees who have access to such information solely as part of their essential job functions and who, while acting on behalf of the Company, make unauthorized disclosure of that information. Company representatives may disclose employees' wages in

January 2025

response to a complaint or charge, or in furtherance of an investigation, proceeding, hearing or action under state law.

3.07 ATTENDANCE

Each employee's position and the work that they do at CP Ward is important. It is essential that employees be at work on time for us to serve our clients and run our Company in an efficient manner.

PUNCTUALITY

Although individual schedules may vary, employees should be at their work area on time, ready to work. Punctuality is important. Consistent, unexcused tardiness, as determined by the Company, is considered a performance issue and is subject to disciplinary action, up to and including termination of employment.

EMPLOYEE'S RESPONSIBILITY

An employee who is going to be late or absent from work must contact their manager before their scheduled start time or as soon as is practicable under the circumstances. Employees may contact their manager via call, text or email. Managers will then notify Human Resources.

An employee that is absent for three consecutively scheduled days without contacting their manager or Human Resources will be considered to have voluntarily resigned from their position.

In cases of illness, a doctor's certification, authorizing return to work, may be required for absences of three consecutive days or more and/or for instances of any length involving hospitalization. A doctor's return to work release form may also be required for continued and frequent sick time usage to assure fitness for duty.

3.08 OPEN COMMUNICATION

Our Company is committed to the principle of open communication between employees and their managers concerning any aspect of the employment relationship.

WORKING TOGETHER, WE CAN FIND A SOLUTION TO ANY PROBLEM

In every Company there are honest differences of opinion about working conditions, discipline, policies and other work-related matters. Employees should not keep concerns to themselves, and are encouraged to communicate their issues to management via the steps outlined below. Problems that are unknown cannot be solved. If an employee has a work-related complaint, concern, or problem of any kind, we will welcome the opportunity to discuss it with the employee and resolve it.

FIRST STEP

January 2025

Employees who have a problem, complaint, question, or suggestion about any aspect of our Company are encouraged to discuss the issue with their immediate manager. We hope that most matters can be satisfactorily resolved by such discussions.

SECOND STEP

Employees who are not satisfied with the outcome of this first step or are not comfortable raising a particular issue with their manager, are welcome to discuss the situation with Human Resources. They will meet with the employee and/or their manager and attempt to reach a satisfactory solution.

THIRD STEP

Employees who are not satisfied with the outcome of the second step or are not comfortable raising a particular issue with Human Resources, are encouraged to discuss the situation with senior management. They will review the situation in its entirety, meet with the employee and attempt to reach a satisfactory solution.

If for any reason an employee does not feel comfortable speaking with their manager or the designated management assigned in any step of this policy, the employee should feel free to discuss their concerns with any other member of management with whom the employee feels comfortable.

SUGGESTIONS

CP Ward values employees' talents and abilities and seeks to foster a cooperative environment. For this reason, the Company's Open Communication policy applies not only to complaints and concerns, but to job-related ideas, recommendations and any other suggestions an employee believes would positively benefit CP Ward. CP Ward values employee input and ideas, and therefore all employees should share their feedback, comments and suggestions with a manager or any management employee.

NO RETALIATION

Employees will not be retaliated against in any way for raising concerns, asking questions or for making suggestions.

3.09 SOLICITATION & DISTRIBUTION

In order to prevent disruptions in the operations of our Company solicitation and distribution of advertising material, handbills or other literature during the working time of the employee soliciting or the employee being solicited, or in working areas, is restricted as described below.

SOLICITATION DEFINED

For purposes of this policy, solicitation means activity that poses a reasonable risk of interference with production by calling for an immediate response to another employee's verbal persuasion to join a certain cause or purchase a type of product or service.

DURING WORKING TIME

Employees may not solicit or distribute non-work-related literature to another employee for any purpose when either the person doing the soliciting, or the person being solicited is on working time. For purposes of this policy, working time refers to that portion of any working day in which the employee is actually scheduled to work. It does not include such times as lunch or break time or before or after work. Employees who are on non-working time still may not solicit or distribute non-work-related literature to another employee who is on working time.

IN WORKING AREAS

Employees may not distribute non-work-related literature to another employee for any purpose in the working areas of our Company. "Working areas" do not include areas such as, but not limited to, the cafeteria, parking lot, break rooms or electronic mail.

OUTSIDE INDIVIDUALS

Individuals who are not employed at our Company may not distribute literature, nor solicit employees or visitors at any time on our Company's grounds or inside our offices.

POST NOTICES

Only governmental notices required to be posted due to federal or state regulations may be posted on Company property, unless authorized by Company management.

3.10 STANDARDS OF CONDUCT

The Company expects employees to follow basic, common-sense rules of conduct that will protect everyone's safety and security.

FORMS OF UNACCEPTABLE BEHAVIOR

It is not possible to list all forms of behavior that are considered unacceptable in the workplace, but the following are examples of behaviors that are considered unacceptable and may result in disciplinary action, including suspension, demotion or termination of employment:

- Falsification of employment records, employment information or other records or work-related information of the Company;
- Recording the work time of another employee, allowing any employee to record another employee's work time, or allowing falsification of any time record/timesheet/time report, whether the employee's or another employee's;
- Theft or damage of any Company property or the property of any employee or client, contractor or visitor;
- Use of Company materials, resources, supplies, tools or products for personal reasons without advanced permission from their manager;
- Violation of the Company's electronic resources, in a manner that interferes with the employee's work performance or violates a Company policy;

- Possessing, distributing, selling, transferring, using or being under the influence of alcohol, marijuana or illegal drugs in the workplace;
- Provoking a physical fight or engaging in physical fighting in the work environment, during working hours, at a work event or on premises owned or occupied by the Company;
- Carrying firearms, weapons or dangerous substances at any time, on premises owned or occupied by the Company, unless state law provides otherwise;
- Using violent, threatening or unlawfully harassing language at any time in the work environment, during working hours or while on premises owned or occupied by the Company;
- Making knowingly false statements concerning the Company or any employee, client, contractor or visitor;
- Failing to obtain permission to leave work or be offline during scheduled working time (not including unpaid meal and rest breaks) unless the reason is legally protected;
- Working overtime without authorization or refusing to work assigned hours;
- Violating any policy, rule or procedure of the Company;
- Failure to demonstrate immediate and consistent improvement in poor work performance;
- Committing a fraudulent act or intentional breach of trust under any circumstances; and
- Discrimination or harassment in violation of the Company's Equal Employment Opportunity (EEO) or Harassment & Discrimination Prevention policies against any employee, client, contractor, visitor or other individual involved in the operations of the Company based upon race, religion, age, sex, national origin, disability or any other protected characteristic under applicable federal, state or local law.

CORRECTIVE ACTION

Before taking corrective action, the manager may meet with the employee to explain why the need for corrective action is warranted.

Depending upon the severity of the matter, disciplinary measures may include counseling, verbal warning, written warning, suspension, demotion, transfer or termination. The Company will determine the appropriate corrective action, and does not guarantee that one form of action will necessarily precede another.

AT-WILL EMPLOYMENT

This statement of prohibited conduct does not alter or limit the policy of at-will employment, where applicable. Either the employee or the Company may terminate the employment relationship at any time for any reason, with or without cause, and with or without notice.

SECTION FOUR

BENEFIT PROGRAMS

4.01 HOLIDAYS

CP Ward observes the following holidays each year. Time off for observance of holidays is paid for eligible employees.

OBSERVED HOLIDAYS

New Year's Day	Labor Day
Memorial Day	Thanksgiving Day
Independence Day	Christmas Day

ELIGIBILITY

Full-time and part-time non-exempt employees receive paid holidays. Temporary/seasonal employees do not receive holiday pay. Exempt employees will receive holiday pay in compliance with federal and state wage and hour laws.

To receive holiday pay, eligible non-exempt employees must work their scheduled shift before and after the holiday, unless federal or state law requires otherwise.

HOLIDAY PAY

Holiday pay for non-exempt employees is calculated based on the employee's straight time pay rate (as of the date of the holiday), equivalent to the number of hours the employee would have otherwise worked on that day. Holiday pay is not counted for the purpose of calculating an employee's overtime hours of work or overtime premiums.

A non-exempt employee required to work on a Company-designated holiday will receive time and one-half for all hours worked on the holiday.

Except in cases of intermittent leave, employees who are on a leave of absence are not eligible to receive holiday pay.

HOLIDAY DURING VACATION

Eligible employees who are on vacation or using benefit time when a paid holiday is observed will receive pay for the holiday at their straight time hourly rate and will not be charged for the vacation/benefit time day.

WEEKEND HOLIDAYS

When one of the observed holidays falls on a Saturday, the Company will generally be closed on the preceding Friday. When a holiday falls on Sunday, it will generally be observed on the following Monday.

4.02 BENEFIT TIME

CP Ward's paid benefit time is provided to regular full and part-time employees for the purpose of giving them a period of time away from work for personal, vacation, or sick

leave reasons, including reasons set forth by New York's Paid Sick Leave Law (NY PSL), as stated herein.

AMOUNT OF LEAVE

Full-Time Employees: During their first year of employment, full-time employees accrue benefit time a rate of 1 hour for every 30 hours worked (not to exceed 56 hours per year). Benefit time accrued during the first year of employment may only be used for NY PSL purposes and will not be paid upon an employee's separation from employment. Unused, accrued benefit time from the first year will be added to an employee's benefit leave bank on an employee's first year anniversary. On the first January 1 following an employee's first year anniversary, and thereafter, employees receive benefit time according to the following:

SERVICE PERIOD COMPLETED BENEFIT TIME

First year of completed service	8 days (64 hours)
Years 2-9	13 days (104 hours)
Years 10-19	18 days (144 hours)
Years 20+	23 days (184 hours)

Part-Time Employees: During their first year of employment, employees regularly scheduled to work between 20 and 35 hours per week accrue benefit time a rate of 1 hour for every 30 hours worked (not to exceed 56 hours per year). Benefit time accrued during the first year of employment may only be used for NY PSL purposes, and will not be paid upon an employee's separation from employment. Unused, accrued benefit time from the first year will be added to an employee's benefit leave bank on an employee's first year anniversary. On the first January 1 following an employee's first year anniversary, and thereafter, employees receive pro-rated amount of benefit time based on the above schedule.

Seasonal/Temporary Employees: Seasonal and temporary employees or employees who work less than 20 hours per week accrue benefit time a rate of 1 hour for every 30 hours worked (not to exceed 56 hours per year). Seasonal/temporary employees may only use benefit time for the purposes set forth by NY PSL.

CARRYOVER

Employees may carryover available, unused benefit time from one year to the next. However, an employee may not use more than the amount of leave accrued or provided in the relevant year.

REASONS FOR USE OF BENEFIT TIME SET FORTH BY NY PSL

An eligible employee may take up to 56 hours of benefit time in a year under this policy for the following reasons:

1. The mental or physical illness, injury, or health condition of the employee, regardless of whether such illness, injury, or health condition has been diagnosed or requires medical care at the time that such employee requests such leave, as well as the diagnosis, care or treatment of the same;

January 2025

2. The mental or physical illness, injury, or health condition of an employee's family member, regardless of whether such illness, injury, or health condition has been diagnosed or requires medical care at the time that such employee requests such leave, as well as the diagnosis, care or treatment of the same;
3. An absence from work when an employee or an employee's family member has been the victim of domestic violence, a family offense, sexual offense, stalking, or human trafficking, including leave to:
 - a. Obtain services from a domestic violence shelter, rape crisis center, or other services program;
 - b. Participate in safety planning, temporarily or permanently relocate, or take other actions to increase the safety of the employee or the employee's family members;
 - c. Meet with an attorney or social services provider to obtain information and advice on, and prepare for and participate in, any criminal or civil proceeding;
 - d. File a complaint or domestic incident report with law enforcement;
 - e. To enroll children at a new school;
 - f. Meet with a district attorney's office; and
 - g. Take any other actions necessary to ensure the health or safety of the employee or the employee's family member, or to protect those who associate or work with the employee.

**An employee who has committed domestic violence, a family or sexual offense, stalking, or human trafficking is not eligible for leave under 3(a)-(g), nor may this leave be used on behalf of an employee's family member who has engaged in any of these.

For purposes of this policy, "family member" is defined as an employee's child (including biological child, adopted child, foster child, a legal ward, or a child for whom the employee stands "in loco parentis"), spouse, domestic partner, parent (including biological parent, foster parent, step-parent, adoptive parent, legal guardian, or an individual who stood "in loco parentis" to the employee as a minor child), sibling, grandchild or grandparent, and the child or parent of an employee's spouse or domestic partner.

SCHEDULING OF TIME OFF

Employees must use benefit time in 4 hour increments.

When Not Used for NY PSL Purposes: To schedule time off that is not used for purposes set forth by NY PSL, requests should be made in writing to the employee's supervisor. While every effort will be made to grant benefit time requests, approval is based on operational needs. In situations where several requests are made for the same day or week, requests will be approved based on the date the request is received.

When Used for NY PSL Purposes: When benefit time is used for purposes set forth by NY PSL, employees must only provide prior notice to their supervisors before using

benefit time. If an employee fails to provide such notice, the employee may be denied the use of leave, or may be subject to discipline under the Network's attendance policy.

Generally, employees do not have to provide documentation supporting their need for the use of benefit time. However, employees may be required to provide documentation regarding their use of benefit time when an employee uses benefit time for NY PSL purposes for three or more consecutive shifts. An employee does not have to pay the cost of producing such documentation, and may contact the Human Resources Department regarding reimbursement of this expense.

RATE OF PAY FOR BENEFIT TIME

All benefit time will be paid at the employee's regular rate of pay at the time the leave is taken.

INTERACTION WITH OTHER BENEFITS

Benefit time will be fully integrated with other benefits provided to you. Benefit time runs concurrently with FMLA, when applicable. Employees may elect to supplement their Paid Family Leave benefits with available benefit time, when applicable. In no circumstances shall an employee receive more than 100% of the employee's regular pay.

SEPARATION FROM EMPLOYMENT

If available, up to 56 hours of benefit time will be provided when an employee resigns or voluntarily separates from the Company following appropriate notice procedures, as otherwise stated in this handbook. Employees who are terminated are not eligible for payout of available, unused leave.

NO-RETALIATION

Any form of discipline, reprisal, intimidation, retaliation, or discrimination against any individual for requesting or taking benefit time for NY PSL reasons, or filing a complaint for violations of this policy is strictly prohibited.

The Company is committed to enforcing this policy and prohibiting retaliation against employees who request or take benefit time for NY PSL purposes under this policy, or who file a related complaint. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately to Human Resources.

4.03 BENEFITS

CP Ward provides eligible employees with a comprehensive benefits package including medical, dental and vision insurance, supplemental benefits, a 401(k)-retirement plan and an Employee Assistance Program (EAP).

PLAN INFORMATION

Information regarding benefits provided to eligible employees will be distributed upon hire and during the annual open enrollment. Benefits are controlled by the terms of the applicable plan documents and insurance policies.

ADDITIONAL INFORMATION

Employees may meet with Human Resources to discuss benefit options and/or to obtain copies of plan documents.

A more thorough explanation of the plans is contained in the respective Summary Plan Descriptions, plan documents and insurance policies available from Human Resources. In the event of a discrepancy between the terms of this policy and the official plan documents, the official plan documents will control. CP Ward and, if applicable, the benefit plan administrators or insurance companies, reserve the maximum discretion and right permitted by law to administer and interpret the health plan, as well as to amend, modify or terminate the plan at any time for any reason.

4.04 CONSOLIDATED OMNIBUS BUDGET RECONCILIATION ACT (COBRA)

The following is a summary of the Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) and New York health continuation coverage or “mini-COBRA” law. These laws require most employers to offer employees and their families continued group health insurance coverage at group rates in certain circumstances.

CONTINUATION COVERAGE

Federal law requires most employers to offer employees and their families the opportunity to temporarily continue group health insurance coverage (called "continuation coverage") at group rates in specified circumstances where coverage under the plan would otherwise end. COBRA continuation coverage for CP Ward applies to medical/dental/vision/EAP. New York’s mini-COBRA law also requires temporary continuation coverage by the applicable insurance carrier if COBRA does not apply where either (i) the employer has less than 20 employees or (ii) federal COBRA continuation coverage was exhausted.

ELIGIBILITY

Employees of the Company who are covered by Company group medical/dental/vision/EAP coverage have a right to choose this continuation coverage if they lose their group medical/dental/vision/EAP coverage because of a reduction in their hours of employment or the termination of their employment (for reasons other than gross misconduct on the employee’s part), among certain other qualifying events.

The spouse or dependent child of an employee covered by the Company group medical/dental/vision/EAP coverage also has the right to choose continuation coverage if they lose group health coverage under certain qualifying events.

OPTIONS

If an employee does not choose continuation coverage, their group health insurance coverage will end. If an employee chooses continuation coverage, the Company is required to give the employee coverage that is identical to the coverage provided under the plan to similarly situated active employees or family members. Employees may be required to pay the entire premium for their continuation coverage, plus a small administrative fee.

At the end of the continuation coverage period, employees must be allowed to enroll in an individual conversion health plan if such option is available under the Company's group medical/dental/vision/EAP coverage.

If an employee does not choose continuation coverage of medical/dental/vision/EAP benefits, the employee may submit claims only for eligible medical/dental/vision/EAP expenses incurred through the last day of employment or applicable grace period, if any. If an employee chooses COBRA continuation medical/dental/vision/EAP benefits, the employee may obtain reimbursement of eligible expenses incurred after termination of employment, provided the employee continues to pay contributions to the plan plus a small administrative charge.

ALTERNATIVES TO COBRA

An employee may have other options available when losing group health coverage. For example, an employee may be eligible to buy an individual plan through the Health Insurance Marketplace. By enrolling in coverage through the Marketplace, an employee may qualify for lower costs on monthly premiums and lower out-of-pocket costs. Additionally, an employee may qualify for a 30-day special enrollment period for another group health plan for which the employee is eligible (such as a spouse's plan), even if that plan generally doesn't accept late enrollees.

This policy is only a summary of the employee's rights under the continuation coverage provisions of the law. Additional information regarding employee rights is contained in the plan's general COBRA notice or can be obtained from Lifetime Benefit Solutions and/or Human Resources. In the event of a discrepancy between the terms of this policy and the official plan documents, the official plan documents will control.

4.05 DISABILITY LEAVE

Our Company offers employees a leave of absence due to an injury or illness, including pregnancy-related disability, consistent with applicable law.

ELIGIBILITY

All employees are eligible for this leave.

LENGTH OF LEAVE

Leave will be provided as medically necessary and consistent with the operational needs of the Company. The Company will comply with the requirements of the Americans with Disabilities Act and state law.

PAY DURING LEAVE

Disability leaves are unpaid, except to the extent an employee is eligible to receive workers' compensation benefits, short-term disability benefits or benefit time. Employees who receive workers' compensation or short-term disability benefits may choose to supplement their benefit with available benefit time to receive up to 100 percent of their average weekly wages.

MEDICAL CERTIFICATION

Prior to the granting of such leave, employees must provide Human Resources with a health care provider's certificate justifying the medical need for the disability leave and the expected date of return.

HEALTH INSURANCE DURING LEAVE

Our Company will continue to provide health insurance coverage for employees on authorized disability leave for up to three (3) months. Employees are required to pay their portion of the premium on the first day of each month. Coverage will cease if an employee's premium payment is more than 30 days late.

RETURN TO WORK

Before returning to work, employees are required to present documentation from a health care provider certifying they can return to work with or without a reasonable accommodation.

JOB REINSTATEMENT

We will make all reasonable efforts to return employees to the same or similar position as held prior to the disability leave, subject to our staffing and business requirements and applicable law. An employee's continued absence from work beyond the period of disability without communication with the Company may be deemed a voluntary termination of employment.

OTHER LEAVES

This disability leave runs concurrently with any other leave required by law, provided the employee is eligible for that leave.

4.06 NEW YORK PAID FAMILY LEAVE BENEFITS

New York's Paid Family Leave (PFL) law provides job protected leave and wage replacement to eligible employees for qualifying events.

ELIGIBILITY

To be eligible, employees must: regularly work 20 or more hours per week and be employed for at least 26 consecutive workweeks preceding the first full day family leave is taken; or regularly work less than 20 hours per week and be employed for at least 175 days preceding the first full day family leave is taken. Paid time off can be counted toward an employee's eligibility determination. Employees are eligible for PFL regardless of citizenship and/or immigration status.

PFL is granted to eligible employees who request time off for the following qualifying events:

- To participate in providing care, including physical or psychological care, for an employee's spouse, child, stepchild, parent, parent-in-law, stepparent, grandchild, grandparent, or domestic partner with a serious health condition;
- To bond with a child during the first 12 months after the child's birth, adoption or foster care placement with the employee, the employee's spouse, or the employee's domestic partner; or
- Due to a qualifying exigency for the employee's spouse, domestic partner, child, or parent who is on active military duty or has been notified of an impending call to active duty.

A serious health condition for PFL purposes is defined in the same way as under FMLA, and is an illness, injury, impairment, or physical or mental condition that involves: (a) inpatient care in a hospital, hospice or residential health care facility; or (b) continuing treatment or continuing supervision by a health care provider.

LENGTH OF LEAVE AND BENEFITS

Eligible employees may receive up to 12 weeks of job protected, paid time off for a PFL-qualifying reason. Employees taking PFL will receive 67% of their average weekly wage, or 67% percent of the state average weekly wage, whichever is less.

Employees who take PFL in weekly increments are eligible for the maximum number of weeks of leave, as indicated above, using a 52-week rolling look back period.

Employees who take PFL in daily increments (intermittent leave) are eligible for paid leave based on the average number of days worked per week during a base period.

PFL is measured using a 52-week lookback period.

INTERMITTENT USE

Eligible employees may take leave under the PFL on an intermittent basis, in full-day increments. Employees may not take partial day leave under PFL.

When an employee takes intermittent PFL, the employee must provide notice to their manager and Human Resources as soon as is practicable before each day of intermittent leave.

MULTIPLE EMPLOYEES REQUESTING LEAVE

More than one employee of the Company cannot use the same period of PFL to bond with the same child or to care for the same qualifying family member. However, more than one employee may take PFL to care for the same qualifying family member at different periods of time.

EMPLOYEE NOTICE REQUIREMENTS

In the case of a foreseeable leave, a covered employee must provide Human Resources with advance notice 30 days before the date on which the leave would begin. If the employee is unable to provide 30 days' notice, they must provide notice as soon as it is practicable under the circumstances. Usually, this means giving notice the same day the employee receives notice or the next business day. If an employee does not give Human Resources timely notice, the employee's PFL leave may be delayed or denied.

Whether PFL will be granted is determined by the insurance company for CP Ward. In giving notice, an employee must provide sufficient information for the insurance company to determine if the leave qualifies for PFL and the anticipated timing and duration of the leave.

PROCEDURE FOR REQUESTING LEAVE

Employees must complete and submit a Request for Paid Family Leave Form (PFL-1) with supporting documentation, as follows, to Standard Security:

- (1) Bonding Certification: PFL-2 Form plus documentation;
- (2) Health Care Provider Certification: PFL-4 Form plus Personal Health Information (PHI) Release (PFL-3 Form); or
- (3) Military Qualifying Event: PFL-5 Form plus documentation.

The Forms can be obtained from Human Resources or Standard Security.

To submit a request for PFL, employees must:

- Complete the employee's portion of the PFL-1 Form.
- Submit the PFL-1 Form to Human Resources.
- The Company will complete its portion of the PFL-1 Form and return it to the employee within three (3) business days.
- If the Company fails to respond, the employee may submit all materials directly to Standard Security.
- Depending on the type of PFL leave the employee is seeking, the employee will be required to complete additional PFL forms as described in the letter from

Standard Security. Employees must submit the completed PFL forms to Standard Security before or within 30 days after the start of their leave. Standard Security must pay or deny leave requests within 18 calendar days of receiving an employee's completed forms.

CONTINUATION OF BENEFITS DURING LEAVE

Employees are entitled to continue group health benefits under the same terms and conditions as if they were on the job during PFL. Employees are required to pay their portion of the premium by the first of each month. The Company's obligation to maintain health insurance coverage ceases if an employee's premium payment is more than 30 days late. If the health care premium is overdue, the Company will notify the employee in writing at least 15 days before coverage is to cease, advising that coverage will be dropped on a specified date at least 15 days after the date of the letter, unless payment has been received by that date.

If group health plan benefits lapse because an employee has not made the required premium payments, then upon the employee's return from PFL, the employee will be restored to coverage/benefits equivalent to those the employee would have had if Paid Family Leave had not been taken and premium payment(s) had not been missed, including family or dependent coverage.

If an employee chooses not to retain group health plan coverage during PFL, then upon the employee's return from leave, the employee shall be reinstated into the health plan on the same terms the employee had prior to taking leave.

An employee's use of PFL will not result in the loss of any employment benefits that accrued prior to the start of PFL.

All other employee-paid benefits will be retained as long as the employee continues to make premium payments.

CONCURRENCE WITH OTHER LEAVES/BENEFITS

Employees may supplement PFL benefits with available paid benefit time.

If an employee takes PFL leave for an event that also qualifies as leave under the FMLA, the employee's PFL leave will run concurrently with available FMLA leave. If an employee's need for leave qualifies under both PFL and FMLA, but the employee declines to apply for PFL benefits (despite being notified that the reason for leave is a PFL-qualifying reason), any leave taken by the employee for such reason will nevertheless be counted against the employee's PFL allotment.

Short-Term Disability

Employees cannot use PFL and short-term disability benefits at the same time, but can use them consecutively, up to a maximum of 26 weeks of disability and PFL benefits combined in a rolling 52-week period. If an employee is unable to work and qualifies for workers' compensation benefits, the employee may not use PFL benefits at the same time the employee is receiving workers' compensation benefits. An employee receiving reduced earnings may be eligible for PFL.

January 2025

COST

PFL premiums are paid for by the employee and are deducted from the employee's paycheck on an after-tax basis. The deduction amount is set annually by the Department of Financial Services.

WAIVER OPTION

Employees have the option of filing a waiver for PFL benefits if:

- The employee's regular employment schedule is 20 hours or more per week, however the employee will not work 26 consecutive weeks; or
- The employee's regular employment schedule is less than 20 hours per week and the employee will not work 175 days in a 52-consecutive-week period.

Employees who are eligible to waive PFL benefits and wish to do so must complete and submit a waiver form to Human Resources. Employees who submit a waiver form will not make any contributions for PFL benefits and will not be eligible to receive PFL benefits. If the employee voluntarily revokes the waiver, or the employee's schedule changes such that it is anticipated that the employee will become eligible to receive PFL benefits, the waiver will be revoked, the employee must start making contributions on a going forward basis and must pay retroactive contributions to the employee's date of hire.

PERIODIC STATUS REPORTS AND RETURN FROM LEAVE

The Company may require an employee on PFL leave to report periodically on the employee's status and intent to return to work to the extent permitted by law.

Any employee who exercises their right to PFL will receive job protection. This means that upon the expiration of that leave, the employee will be entitled to return to the same position the employee held when leave began, or to an equivalent position with equivalent pay and other terms and conditions of employment.

QUESTIONS AND ADDITIONAL INFORMATION

Employees who have questions regarding this policy should contact Human Resources. For additional information concerning leave entitlements and obligations that might arise when PFL is either not available or exhausted, employees should consult the Company's other leave policies or contact Human Resources. The Company is committed to complying with PFL and shall interpret and apply this policy in a manner consistent with the PFL regulations. Employees who disagree with a denial of their claim for PFL may submit their dispute to arbitration. Employees will be provided with information about how to request arbitration with their PFL denial.

Employees are protected from discrimination and retaliation for requesting or taking PFL. If an employee believes their rights have been violated and/or job restoration has been denied as a result of requesting and/or taking PFL, the employee should inform Human Resources immediately.

4.07 FAMILY AND MEDICAL LEAVE ACT

The Family and Medical Leave Act (FMLA) provides eligible employees with time off when qualifying family or medical issues require a leave of absence.

ELIGIBILITY

Employees are eligible for FMLA leave if they have worked for the Company for at least 12 months (the 12 months need not be consecutive) and have worked at least 1,250 hours during the 12-month period before commencement of the leave (hours paid, but not worked, and unpaid leave will not be counted in determining the 1,250 hours of service).

BASIC FMLA LEAVE

Employees who meet the eligibility requirements described above are eligible to take up to 12 weeks of unpaid leave during any 12-month period for any of the following reasons:

- The birth of the employee's son or daughter and/or to care for the child during the first 12 months following birth;
- The placement of a son or daughter with the employee for adoption or foster care and/or to care for the child during the first 12 months following placement;
- To care for an employee's spouse, son, daughter, or parent who has a serious health condition; or
- For a serious health condition that makes the employee unable to perform his/her job, including incapacity due to the employee's pregnancy, prenatal medical or child birth.

The relevant 12-month period used to determine eligibility for Basic FMLA Leave will be calculated on a rolling basis, measured backwards from the date the employee uses any such leave.

When both spouses are both employed by the Company, they are limited to a combined total of 12 weeks of leave during any 12-month period if the leave is taken:

- For the birth of the employees' son or daughter or to care for the child after birth;
- For placement of a son or daughter with the employees for adoption or foster care, or to care for the child after placement; or
- To care for an employee's parent with a serious health condition.

Serious Health Condition

A serious health condition is an "illness, injury, impairment, or physical or mental condition" that requires (1) inpatient care or (2) continuing treatment:

1. "Inpatient Care" is an overnight stay in a hospital, hospice, or residential medical-care facility and any resulting period of incapacity or treatment.
2. "Continuing treatment" is defined as one of the following:

- a period of incapacity of more than 3 consecutive calendar days and (i) treatment 2 or more times by a health care provider within 30 days of the first day of incapacity (unless extenuating circumstances exist); or (ii) treatment by a health care provider which results in a regimen of continuing treatment;
 - The first treatment visit must take place within 7 days of the first day of incapacity.
 - Treatment by a health care provider also requires an in-person visit to the health care provider.
- a period of incapacity due to pregnancy or for prenatal care;
- a period of incapacity or treatment for a chronic serious health condition which requires periodic visits for treatment (at least 2 visits per year) by a health care provider;
- a period of incapacity which is permanent or long-term due to a condition for which treatment may not be effective; or
- a period of absence to receive multiple treatments for (i) restorative surgery after an accident or injury or (ii) an injury or condition which would result in incapacity of more than 3 consecutive calendar days if left untreated.

Ordinarily, unless complications arise, the common cold, flu, ear aches, upset stomach, ulcers, headaches other than migraines, routine dental problems, etc. do not qualify as serious health conditions. In addition, routine medical examinations are not considered serious health conditions, and neither are voluntary cosmetic treatments, unless inpatient care is required or complications develop.

The terms spouse, parent, son and daughter are defined in accordance with the FMLA. If you have any questions regarding these definitions, please contact Human Resources.

MILITARY FAMILY LEAVE

There are two types of Military Family Leave available: Qualifying Exigency Leave and Covered Servicemember Leave.

Qualifying Exigency Leave – Employees meeting the eligibility requirements may be entitled to use up to 12 weeks of their Basic FMLA Leave entitlement to address certain qualifying exigencies.

Leave may be used if the employee’s spouse, son, daughter, or parent (the “military member”) is on covered active duty (or has been notified of an impending call or order to covered active duty) in the Armed Forces. The term “covered active duty” is defined in accordance with the FMLA. If you have any questions about what constitutes a “covered active duty,” please contact Human Resources.

Qualifying exigencies may include:

- Short-notice deployment (up to 7 days of leave);
- Attending certain military events and related activities;

- Arranging for alternative childcare and attending certain school meetings;
- Addressing certain financial and legal arrangements;
- Spending time with a covered servicemember who is on short-term rest and recuperation leave (up to 15 calendar days of leave);
- Caring for a military member's parent who is incapable of self-care, when such care is necessitated by the member's covered active duty (*i.e.*, arranging for alternative care, providing care on an immediate need basis, admitting or transferring the parent to a care facility, attending meetings with staff at a care facility, etc.);
- Attending certain counseling sessions;
- Attending post-deployment activities that occur up to 90 days after the termination of the covered servicemember's active duty status or to address that arise from the death of a covered servicemember while on (covered) active duty status; and
- Other activities arising out of the servicemember's active duty or call to (covered) active duty status which are agreed upon by the Company and the employee.

The relevant 12-month period used to determine eligibility for Basic FMLA Leave will be calculated on a rolling basis, measured backwards from the date the employee uses any such leave.

Covered Servicemember Leave (a.k.a. "Military Caregiver Leave") – There is also a special leave entitlement that permits employees who meet the eligibility requirements for FMLA leave to take up to 26 weeks of unpaid leave during a single 12-month period to care for an immediate family member (spouse, child, parent) or next of kin (nearest blood relative) who is a covered servicemember.

A "covered servicemember," as it applies to this form of leave, is: (1) a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness; or (2) a covered veteran who is undergoing medical treatment, recuperation or therapy for a serious injury or illness. The terms "covered veteran" and "serious injury or illness" are defined in accordance with the FMLA. If you have any questions about what constitutes a "covered veteran" or a "serious injury or illness," please contact Human Resources.

The 12-month period for Covered Servicemember Leave is defined as the 12-month period measured *forward* from the date an employee's first FMLA leave to care for the covered servicemember begins. In other words, the single 12-month period begins on the first day the eligible employee takes FMLA leave to care for a covered servicemember and ends 12 months after that date, regardless of the method used by the Company to determine the employee's 12 workweeks of leave entitlement for other FMLA-qualifying reasons. During this 12-month period, an eligible employee's FMLA leave entitlement is limited to a combined total of 26 workweeks of leave for any FMLA-qualifying reason.

In cases where both spouses are employed by the Company, the combined total of leave taken to care for a covered servicemember may not exceed 26 weeks in a single 12-month period.

EMPLOYEES' RESPONSIBILITIES

If the need for leave is foreseeable, the employee must notify his/her manager and Human Resources at least 30 days before the FMLA leave begins. When 30 days' notice is not possible, the employee must give notice as soon as practicable (or within 1 or 2 business days) of learning of the need for leave, except in extraordinary circumstances. Failure to provide such notice may be grounds for delaying the start of the FMLA leave or denying the request for leave.

If the need to use FMLA leave is not foreseeable, the employee must notify his/her manager and Human Resources as soon as practicable (or within 1 or 2 business days). Employees are expected to provide notice in accordance with this Policy, as well as the Company's usual and customary notice requirements, which means that notice of the need for unforeseeable FMLA leave should ordinarily be given prior to the start of the employee's workday, absent unusual circumstances. Failure to provide such notice may be grounds for delaying the start of the FMLA leave or denying the request for leave.

The employee will be requested to fill out the FMLA form(s) and the appropriate medical certification form which can be obtained from Human Resources. Furthermore, when submitting a request for leave, the employee must provide sufficient information for the Company to determine if the leave might qualify for FMLA leave, and also provide information on the anticipated date when the leave would start, as well as the anticipated duration of the leave.

EMPLOYER RESPONSIBILITIES

When an employee requests leave, the Company will inform the employee whether he or she is eligible for leave under the FMLA and provide the employee with written notice of his or her rights and responsibilities. The Company will also inform the employee whether the leave will be designated as FMLA-protected, and if so, provide information on the amount of leave that will be counted against the employee's 12 or 26 week entitlement.

The Company will require that an employee's request for leave to care for the employee's spouse, son, daughter, or parent with a serious health condition, or due to the employee's own serious health condition that makes the employee unable to perform the functions of the employee's position, be supported by written medical certification issued by an appropriate health care provider providing the medical attention. Additionally, if an employee is requesting either Qualifying Exigency Leave or Military Caregiver Leave, the employee must also provide appropriate certification.

When the employee requests leave, the Company will notify the employee of the requirement for certification and when it is due. The employee must provide the requested certification to the Company within 15 calendar days after the Company's

January 2025

request, unless to do so is not practicable despite the employee's diligent, good faith efforts. Failure to provide requested certification in a timely manner may result in denial of leave until it is provided.

The employee certification must be complete and sufficient. In the event that the certification is deficient, the Company will advise the employee, in writing, what additional information is necessary to make the certification complete and sufficient. The employee will be given 7 calendar days (unless not practicable despite the employee's diligent, good faith efforts) to cure any such deficiency. If the deficiencies are not cured in the resubmitted certification, the Company may deny the taking of FMLA leave.

The Company may require verification of the need for leave by requesting that the employee obtain a second or third medical opinion. Failure to obtain the second and/or third medical opinion(s), where applicable, will result in the result in denial of FMLA leave. Where permissible, the Company may also require subsequent medical recertification and/or an annual certification. Failure to provide requested certification within 15 days, unless it is not practicable to do so despite the employee's diligent, good faith efforts, may result in the delay of further FMLA leave.

INTERMITTENT LEAVE

Leave because of a serious health condition involving an employee or an employee's spouse, child, or parent, or either type of Military Family Leave may be granted on an intermittent basis (in separate blocks of time due to a single health condition) or on a reduced-schedule leave (reducing the number of hours worked per workweek or workday) when necessary because of the nature of the medical condition and the scheduling of medical treatments. Leave may not be taken on an intermittent basis or on a reduced work schedule when used to care for the employee's own child during the first year following birth, or to care for a child placed with the employee for foster care or adoption, unless both the Company and the employee have expressly agreed to such leave in writing. However, when FMLA is running concurrently with New York Paid Family Leave ("PFL"), employees are permitted to take leave intermittently (in full day increments) to bond with a new child following the birth, adoption or placement in foster care.

When planning medical treatment, employees must consult with the Company and make reasonable efforts to schedule leave so as not to unduly disrupt the Company's operations.

If leave is unpaid, the Company will reduce the employee's salary based on the amount of time actually taken. In addition, while an employee is taking recurring leave on an intermittent or reduced-schedule basis for *foreseeable*, planned medical treatments, the Company may temporarily transfer or assign the employee to another position or an alternative position that better accommodates the recurring leave and which has equivalent pay and benefits.

MAINTENANCE OF HEALTH BENEFITS

While an employee is on leave, the Company will maintain the employee's health benefits as if the employee continued to be actively employed. Specifically, the

January 2025

employee will be required to continue to pay for his/her group medical premium during the FMLA leave. In addition, the employee will be given the opportunity to choose continuation coverage under the COBRA regulations if he/she has not returned to work at the end of the 12-week period.

If paid leave is substituted for unpaid FMLA leave, the Company will deduct the employee's group medical premium as a regular payroll deduction. If leave is unpaid, the employee will be responsible for continuing to pay the premium by mailing it on a monthly basis to the Company.

The employee's coverage and the coverage of all enrolled dependents will be terminated if the payment of the employee's premium is more than 30 days late. If the payment is more than 15 days late, the Company will send the employee a letter to this effect. If the Company does not receive the payment for outstanding benefit premium within 15 days after the date of that letter, the employee's coverage will terminate for non-payment of his/her insurance premium.

The employee has a five (5) day grace period to submit payment after which coverage will be discontinued if payment is not received and will result in the loss of their COBRA rights. There are no provisions for reinstating the employee's coverage after the COBRA rights have been lost.

USE OF PAID LEAVE

Employees on unpaid FMLA leave will not accumulate paid time off and are required to substitute all forms of available paid benefit time for their unpaid leave. The substitution of paid leave time for unpaid leave time does not extend the 12-week leave period. Furthermore, in no case can the substitution of paid leave time for unpaid leave time result in the receipt of more than 100 percent of an employee's normal wages. An employee's FMLA leave runs concurrently with other types of leave or paid time taken during the FMLA leave.

Employees who are on a leave of absence that is covered by payments such as disability benefits, Paid Family Leave or Workers' Compensation benefits will not be required to substitute accrued paid benefit time while receiving these benefit payments. However, the Company and the employee may agree to have accrued paid leave supplement the disability, Paid Family Leave or Workers' Compensation benefits to the extent permitted by state law. **Any leave of absence taken pursuant to an applicable disability law, Paid Family Leave or Workers' Compensation law will be run concurrently with FMLA leave where the reason for leave qualifies under both laws.**

REPORTING AND RETURN TO WORK

While on leave, employees may be required to contact Human Resources to report on their status and intent to return to work. In addition, the employee must give notice as soon as practicable, within 2 business days, if the dates of the leave change, are extended, or were unknown initially.

Prior to the exhaustion of FMLA leave, employees will be responsible for notifying Human Resources, in writing, regarding their intention to return to work.

An employee (whose leave was occasioned by the employee's own serious health condition that made the employee unable to perform their job) will be required to present medical certification from the health care provider that he/she is able to resume work. This certification must specifically address the employee's ability to perform the essential functions of his or her job. Failure to provide such medical certification may result in delay or denial of reinstatement.

Whenever possible, employees who return at the end of the approved leave time will be restored to the position they held when the leave began. If the same position is not available, the employee will be restored to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment. An exception to this policy of restoration may be made with respect to "key employees" (*i.e.*, salaried employees in the top 10% of the Company's payroll).

FRAUD AND POSTING

An employee who fraudulently obtains FMLA leave or who uses FMLA in a fraudulent manner is subject to disciplinary action, up to and including termination.

In accordance with federal law, the Company posts a notice summarizing the provisions of the FMLA, including enforcement of the law. A copy of the notice posting is also attached to this handbook.

4.08 BEREAVEMENT

In the event of a death in an employee's immediate family, the employee may take a leave immediately following the death for the purpose of making arrangements and attending the funeral.

COMPENSATION

All employees will receive up to three (3) days off with pay based on their regularly scheduled number of hours and rate of pay in the event of the death of an immediate family member. For the purposes of this policy, members of the immediate family include the employee's spouse, domestic partner, parents, children, stepchildren, sisters, brothers, parents-in-law, sons/daughters-in-law, grandparents, grandchildren, stepparents and stepparents-in-law, equivalent relations of an employee's domestic partner, and anyone living in the same household.

Employees who need time off to attend a funeral for an individual that is not covered under this benefit may make arrangements with their manager for time off without pay.

4.09 BONE MARROW & BLOOD DONATION LEAVE

In accordance with New York State law, our Company offers employees a leave of absence for the purpose of bone marrow or blood donation.

TIME AWAY FROM WORK

Employees who work at least 20 hours per week who seek to undergo a medical procedure to donate bone marrow will be granted an unpaid leave of absence no longer than 24 work hours.

Employees who work at least 20 hours per week may be granted an unpaid three (3) hours of leave in any 12-month period for the purposes of donating blood.

VERIFICATION

Employees are requested to give as much advance notice as possible. Employees who donate bone marrow must provide Human Resources with verification from a physician as to the purpose and length of leave requested.

4.10 JURY DUTY & COURT ATTENDANCE

Our Company considers service on a jury to be an important civic duty.

JURY DUTY PAY

If an employee is called to serve, they are paid regularly scheduled wages for up to three (3) days. Thereafter, time off to serve on jury duty is unpaid with the exception of any use of permissible benefit time. Exempt employees will be paid their full weekly salary if they work any part of the week in which they perform jury service.

DOCUMENTATION

Employees must submit a copy of the Jury Duty Attendance Certificate to their manager or Human Resources indicating the dates served. Employees will receive this statement when their jury duty is complete.

TIME AWAY FROM WORK

In fairness to the Company, employees are expected to return to work if they are excused from jury duty during their regular working hours.

COURT ATTENDANCE

Employees who are subpoenaed to appear in court as a witness in a criminal proceeding or who attend court as a victim of a crime, will be granted unpaid time off for their attendance.

4.11 CRIME VICTIM LEAVE

Our Company provides employees with time away from work if they are a victim of a crime or to participate in legal proceedings as a witness of a crime.

ELIGIBILITY

Eligible employees may take time off from work to comply with a subpoena to (1) testify in a criminal proceeding (including time off to consult with the district attorney); (2) give a statement at a sentencing proceeding; (3) give a victim impact statement at a pre-sentencing proceeding; or (4) give a statement at a parole board hearing.

Employees are eligible for time off under this policy if they are:

- The victim of the crime at issue in the proceedings;
- The victim's next of kin;
- The victim's representative (a person who represents or stands in the place of another person, including an agent, attorney, guardian, conservator, executor, heir or parent of a minor) if the victim is deceased as a result of the offense;
- A good Samaritan (someone who acts in good faith to: (1) apprehend a person who has committed a crime in their presence; (2) prevent a crime or an attempted crime from occurring; or (3) aid a law enforcement officer in effecting an arrest); or
- Pursuing an application or the enforcement of an order of protection as provided under relevant law.

CRIME VICTIM LEAVE PAY

Time off under this policy is unpaid, except an employee may use any available paid leave, including company-provided paid time off, to receive pay during this time. Exempt employees will not incur any reduction in pay for a partial week's absence for leave under this policy.

DOCUMENTATION

Employees must notify Human Resources of the need to take a leave under this policy no later than the day before the absence. In addition, employees must provide Human Resources with verification of their service upon request.

TIME AWAY FROM WORK

In fairness to the Company, employees are expected to return to work if they are excused from proceedings during their regular working hours.

NO RETALIATION

The Company will not retaliate or tolerate retaliation against any employee who seeks or obtains leave under this policy.

4.12 DOMESTIC VIOLENCE VICTIM LEAVE

The Company will reasonably accommodate employees who are the victims of domestic violence with time off in compliance with the New York State Human Rights Law.

REASONABLE ACCOMMODATIONS

The Company will reasonably accommodate employees who are the victims of domestic violence and who need a reasonable amount of time off for the following reasons, unless providing such accommodation would result in an undue hardship:

- Seek medical attention for injuries caused by domestic violence, including for a child who is a victim of domestic violence;
- Obtain services from a domestic violence shelter, program or rape crises center;
- Obtain psychological counseling related to domestic violence incidents, including for a child who is a victim of domestic violence;
- Participate in safety planning or other actions to increase safety from future incidents of domestic violence; or
- Obtain legal services, assist in the prosecution of an offense or appear in court in relation to an incident of domestic violence.

EMPLOYEE'S RESPONSIBILITY

Employees must give the Company reasonable advance notice of their intention to take leave for this purpose unless such advance notice is not feasible. An employee who cannot give reasonable advance notice must provide certification supporting the need for leave within a reasonable time after the absence.

Acceptable forms of certification include:

- A police report indicating the employee or the employee's child is a victim of domestic violence;
- A court order protecting or separating the employee or their child from the perpetrator of domestic violence;
- Other evidence from the court or prosecuting attorney that the employee appeared in court; or
- Documentation from a medical professional, domestic violence advocate, health care provider or counselor that the employee or their child was undergoing counseling or treatment for physical or mental injuries or abuse resulting from an act of domestic violence.

When taking leave under this policy, an employee may use any available paid leave, including company-provided paid time off. Otherwise, leave will be unpaid. During the leave, the Company will maintain any health insurance coverage being provided in the same manner as if the employee had not taken leave.

CONFIDENTIALITY

Except as otherwise required by law, the Company will maintain the confidentiality of any information regarding an employee's status as a victim of domestic violence.

NON-RETALIATION

The Company will not discriminate or retaliate against an employee because the employee is a victim of domestic violence or requests leave in accordance with this policy.

4.13 MILITARY LEAVE

The Company recognizes the obligation of those employees serving in any branch of the military or other uniformed services of the United States. Employment status within the Company is protected by the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA") and applicable state military leave provisions.

ELIGIBILITY FOR LEAVE

The Company provides military leaves of absence to employees who serve in the "uniformed services" as required by USERRA and applicable state laws.

The uniformed services are defined as:

- The Armed Forces;
- The Army National Guard and the Air National Guard when engaged in active duty for training, inactive duty training or full-time National Guard duty;
- The commissioned corps of the Public Health Service;
- The commissioned officer corps of the National Oceanic and Atmospheric Administration;
- Members of the National Urban Search and Rescue Response System during a period of appointment into federal service under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act);
- Intermittent personnel who are appointed into Federal Emergency Management Agency (FEMA) service under the Stafford Act or to train for such service; and
- Any other category of persons designated by the President in times of war or national emergency.

REASONS FOR LEAVE

For purposes of this policy, "service in the uniformed services" means the following duties on a voluntary or involuntary basis:

- Active duty;
- Active duty for training;
- Initial active duty for training;
- Inactive duty training;
- Full-time National Guard duty;

- State active duty for a period of 14 days or more in response to a national emergency or major disaster declared by the President or pursuant to a call of the governor of New York or any other state;
- Time off for an examination to determine fitness to perform any such duty;
- Time off for members of the National Urban Search and Rescue Response System due to an appointment into federal service under the Stafford Act;
- Time off due to an appointment into service in FEMA as intermittent personnel under the Stafford Act;
- Funeral honors duty; and
- Time off to attend a military service academy.

LEAVE AND REEMPLOYMENT

CP Ward is committed to preserving the job rights of employees absent on military leave in accordance with law.

Employees who serve on active or reserve duty will be granted a leave of absence up to the maximum time required by law, not to exceed five years, with some exceptions (certain categories of service are exempt from the five-year limitation).

PAY DURING LEAVE

Subject to any applicable and more generous state law, an employee's period of military leave is unpaid. Employees on unpaid military leave may choose to apply Benefit Time to their absence.

Exempt employees will not incur any reduction in pay for a partial week's absence for leave under this policy.

HEALTH CARE CONTINUATION

During a military leave of less than 31 days, an employee is entitled to continued group health plan coverage under the same conditions as if the employee had continued to work. For military leaves of more than 30 days, an employee may elect to continue their health coverage in accordance with USERRA and COBRA. For additional information on health care continuation contact Human Resources.

SPOUSAL LEAVE

In accordance with New York State law, spouses of members of the U.S. armed forces, National Guard or reserves that have been deployed to a combat area during a period of military conflict are entitled to up to 10 days of unpaid leave. The spouse must work on average at least 20 hours per week to be eligible for this leave. The military personnel must be on leave at the time the spousal leave is taken.]

Where applicable, this leave may run concurrently with any available New York State Paid Family Leave, the Family and Medical Leave Act (FMLA) or any other leave benefit that may be required by state law.

Employees should also refer to the New York State Paid Family Leave policy and the Family and Medical Leave Act policy to determine if they are also eligible for benefits under either of those policies.

EMPLOYEE'S RESPONSIBILITY

Employees are expected to inform their manager of their need for military or spousal leave as far in advance as possible unless giving notice is impossible, unreasonable, or precluded by military necessity. Employees also must submit a copy of the military orders to Human Resources.

Employees must also notify Human Resources before returning to work. For service of less than 31 days, the service member must return at the beginning of the next regularly scheduled work period on the first full day after release from service, taking into account safe travel home plus an eight-hour rest period. If this is impossible or unreasonable, then as soon as possible. For service of more than 30 days but less than 181 days, the service member must submit an application for reemployment within 14 days of release from service. If this is impossible or unreasonable through no fault of the employee, then as soon as possible. For service of more than 180 days, an application for reemployment must be submitted within 90 days of release from service. Reporting or application deadlines are extended for up to two years for persons who are hospitalized or convalescing.

REEMPLOYMENT RIGHTS

Unless an exception applies (e.g., initial enlistments lasting more than five years, periodic National Guard and Reserve training duty, and involuntary active duty extensions and recalls), if the military leave is less than five (5) years, returning service members are reemployed in the job that they would have attained had they not been absent for military service (the "escalator" principle), with the same seniority, status and pay, as well as other rights and benefits determined by seniority. The Company will make reasonable efforts (such as training or retraining) to enable returning service members to refresh or upgrade their skills to help them qualify for reemployment. The Company will explore alternative reemployment positions if the service member cannot qualify for the "escalator" position.

NON-DISCRIMINATION AND NON-RETALIATION

Any employee who believes they have been discriminated against, harassed or retaliated against based on their past, present, or future participation in the uniformed services, request for military leave, complaint or participation in any investigation of a complaint of discrimination or retaliation based on a military leave request or service participation, or any other situation protected under this policy or applicable law should notify Human Resources immediately.

4.14 VOTING LEAVE

Our Company believes that all employees should have the opportunity to exercise their right to vote in elections.

TIME AWAY FROM WORK

Employees who do not have sufficient time to vote outside their working hours will be allowed the necessary time off to vote at the beginning or the end of their shift. Up to two (2) hours will be paid time off. No time off will be allowed in any election where the polls are open at least four (4) consecutive hours before or after the employee's shift.

Employees must return to work immediately after voting if their shift has not ended.

ADVANCE NOTICE

Employees intending to take leave to vote must inform their manager and Human Resources not more than ten (10) but at least two (2) working days prior to Election Day. The employee's manager will designate when the leave should be taken (e.g., at the beginning or end of the shift).

4.15 VOLUNTEER FIREFIGHTER & AMBULANCE PERSONNEL LEAVE

Our Company recognizes the obligations that our employees who serve as volunteer firefighters and ambulance personnel may have in times of emergency.

ELIGIBILITY

Employees who are volunteer firefighters or ambulance personnel are permitted unpaid time off (unless payment is required by law) in the event that a State or local state of emergency has been declared by the Governor or a local government executive (such as a city mayor) and the employee's duties as a volunteer are related to handling/resolving the declared emergency.

NOTIFICATION

If an employee requests time off under the policy, they must notify their manager immediately after the need for the leave becomes known. If the Company grants an employee time off pursuant to this law, the employer may request the employee provide appropriate documentation from the head of the volunteer fire department or ambulance service certifying the period(s) of time that the employee spent responding to the declared emergency.

4.16 PAID PRENATAL LEAVE

In addition to other leave, such as sick and safe leave and paid family leave, CP Ward provides all eligible with paid prenatal leave for health care services as outlined in this policy.

ELIGIBILITY

All prenatal care recipients are entitled to up to 20 hours of paid prenatal leave during any 52-week calendar period.

The 52-week period begins when the employee first uses leave.

REASONS FOR LEAVE

Leave may be taken for the health care services related to the pregnancy including:

- Physical examinations;
- Medical procedures;
- Monitoring and testing;
- Discussions with a health care provider related to the pregnancy;
- Fertility treatments or care appointments; and
- End-of-pregnancy care appointments.

USE OF LEAVE

Paid leave must be taken in hourly increments.

PAY DURING LEAVE

Pay during leave is based on the number of hours the employee is regularly scheduled to work at the employee's normal rate of pay or the applicable minimum wage, whichever is greater.

CONCURRENCE WITH OTHER LEAVE

When an employee is unable to work for pregnancy-related reasons that may also be considered a serious health condition under the federal Family and Medical Leave Act (FMLA), this leave will run concurrently with FMLA.

OTHER REQUIREMENTS

The federal Pregnant Worker Fairness Act also provides accommodations and leave for pregnancy, childbirth or related medical conditions. When applicable, the Company will comply with all legal requirements, including providing greater or different benefits than those indicated in this policy.

EMPLOYEE'S RESPONSIBILITY

Employees may provide a verbal or written request of the need for leave to Human Resources.

CARRYOVER OR PAY OF UNUSED LEAVE

Unused leave will not be carried over to the next leave period, and the Company does not offer pay instead of taking paid leave.

CONFIDENTIALITY

Employees are not required to disclose confidential information relating to their pregnancy or pregnancy-related health conditions.

REINSTATEMENT

Employees utilizing paid prenatal leave will be returned to the same position they held immediately before the use of leave with the same pay and other terms and conditions of employment.

NON-RETALIATION

Employees have the right to request and use prenatal leave in a manner consistent with state law. The **Company** will not discriminate or retaliate, or tolerate discrimination or retaliation, against any employee who seeks or obtains leave under this policy or who otherwise exercises their rights under this policy. Employees who feel they have been retaliated against for such activity should immediately contact Human Resources.

MISUSE OF LEAVE

An employee who uses leave for purposes other than those provided for under this policy, or who lies in connection with taking such leave, may be subject to disciplinary action, up to and including termination.

PAYMENT AT SEPARATION

Unused prenatal leave is not paid upon separation from employment.

ADDITIONAL INFORMATION

Employees who have questions about this policy should contact Human Resources.

4.17 WORKERS' COMPENSATION

Our Company carries a workers' compensation insurance policy which covers all employees in the event that they are injured or become disabled due to occupational illness or injury while on the job.

BENEFITS

For employees who are injured while on the job or who develop an occupational illness, medical expenses, and loss of earnings up to the specified maximum normally will be covered by our workers' compensation insurance policy. Compensation under this plan is based on a formula using the employee's average weekly wages.

ELIGIBILITY

Benefits for lost earnings begin after the seventh day of disability. If disability continues beyond two weeks, the benefits will also be paid for the first week of disability. Payment of medical expenses begins on the first day of disability.

LEAVE ENTITLEMENT

Employees are eligible for a Disability Leave. This leave runs concurrently with any other leave benefit that may be required by state law. See the Disability Leave policy for more information.

COST

The Company pays the entire premium for this insurance policy.

January 2025

REPORTING ACCIDENTS

Employees must report accidents or injuries, even if minor, to a manager and Human Resources, and a report must be filed within 24 hours with the safety department. Failure to receive medical treatment in a timely manner may result in serious complications and may jeopardize eligibility for medical benefits.

4.18 EMPLOYEE ASSISTANCE PROGRAM

On occasion, everyone has personal problems. Usually these problems are resolved with the support of relatives and close friends. But sometimes, employees or members of their family may find that they would benefit from the assistance of a trained counselor. It is for this reason that CP Ward provides an Employee Assistance Program (EAP) to employees and family members who may need help with personal or behavioral problems.

ELIGIBILITY

Our EAP is available to all employees and their family members.

BENEFITS

Through this program, confidential advice and short-term counseling are provided for any employee or member of an employee's family who requests it or for an employee who is referred by their manager. Common problems addressed through counseling include alcoholism, drug abuse, financial difficulties, family tensions and conflicts with co-workers.

The privacy of employees and their family members is protected at all times. The Company is not informed when anyone seeks assistance, unless the individual so requests or the Company refers the employee to the program as a requirement of continued employment.

COST

CP Ward pays the full cost of the Employee Assistance Program. Employees are responsible for the cost of outside referrals. However, the cost for outside referral help may be covered by CP Ward's group health insurance program.

ADDITIONAL INFORMATION

In addition to reviewing the EAP information available on the Company bulletin boards, HRIS, and SharePoint database, employees can contact Human Resources for more information regarding our EAP. If it is a crisis situation, employees should call 911. If it is not a crisis situation, employees may contact 2-1-1 /LIFE LINE at 1-877-356-9211, by dialing 211 or by visiting <http://211lifeline.org/>. The 2-1-1 /LIFE LINE offers referrals for emergency food, shelter, clothing, crisis counseling, substance abuse issues, employment, financial and legal issues and physical and mental health needs.

SECTION FIVE

SAFETY POLICIES

5.01 SAFETY THROUGH TEAMWORK

Safety is a high priority at CP Ward. We accept responsibility for providing employees with a safe working environment and we expect employees to take responsibility for performing their work in accordance with our safety standards and practices.

Safety will only be achieved through teamwork at our Company. We must all join together in promoting safety and taking every reasonable measure to assure safe working conditions exist throughout our Company.

EVERYONE IS RESPONSIBLE FOR SAFETY

Employees who notice an unsafe condition must notify their manager. Immediate action will be taken to correct the situation.

ACCIDENT REPORTING AND INVESTIGATION

All accidents and/or injuries that occur must be reported immediately to the employee's Project Manager and the Safety Department. The Project Manager must initiate the reporting process by completing a preliminary incident report within two (2) hours and forward to the CP Ward Safety Department, even if it appears minor. Upon receiving a response, please be prepared to fully explain and provide additional details as requested.

For the full accident and injury reporting and investigation procedure, refer to the CP Ward Health & Safety Program (HASP).

EMPLOYEE RESPONSIBILITIES

An unsafe worker is a danger to the worker and fellow employees. Attention to all safety procedures is essential, not only to prevent injury, which is paramount, but also to protect property and the tremendous investment that it represents.

Each employee is responsible for safety. To accomplish this, employees should:

- Know and apply safety measures at all times;
- Know the locations, contents and use of first aid and firefighting equipment;
- Understand their job fully;
- Seek guidance from their manager when unfamiliar conditions are encountered;
- Report any accident or near accident to their manager promptly;
- Cooperate in the application of improved work measures; and
- Report any damaged or defective equipment or other unsafe condition to their manager promptly.

Employees have the right to report a work-related injury or illness and will not be subjected to any discrimination or retaliation for doing so.

It is the employee's responsibility to learn the location of all safety and emergency equipment, as well as the appropriate safety contact phone numbers. CP Ward workplace

January 2025

safety includes the following requirements regarding Personal Protective Equipment (PPE):

1. HARD HATS shall be worn in any company shop on any company property, (Office excluded unless a hazard exists) and on any company or customer job site(s) at all times. In the event that you are operating equipment with rollover protection structures or driving vehicles, hard hats are not required.
2. HIGH VISIBILITY VESTS / Clothing shall be worn at all times on company property or client work site(s). ANSI Class 2 or 3 Vest are required while working in or along highways and equipment use areas.
3. SAFETY GLASSES shall be worn in any company shop and on any job site where potential for eye injury exists. Corrective glasses with ANSI Z87.1 and side shields which meet safety standards are acceptable. Goggles will be worn when conditions warrant their use.
4. EAR PLUGS/MUFFS shall be used when noise levels are extreme (above 85 decibels). Plain cotton is not acceptable protective equipment.
5. SPECIALIZED EQUIPMENT such as respiratory equipment, life jackets, body harnesses, and other fall protection devices shall be worn as required.
6. GLOVES/HAND PROTECTION is to be worn where the employee's hands are exposed to situations that can cause cuts or lacerations, absorption of harmful substances, abrasions, punctures, chemical burns, thermal burns, and harmful temperature extremes, and as directed by your foreman. FINGER RINGS and WRISTWATCHES are a hazard and employees are encouraged to remove them while working.
7. SAFETY TOE BOOTS (EH rated) shall be worn that support the ankle (minimum 6") and guard against puncture, toe wounds and electrical shock in shops and on job sites.
8. PROPER WORK ATTIRE including shirts and long pants shall be worn at all times. Shirts must have a minimum of 4" sleeves. Flame retardant/resistant (FR) clothing shall be worn where required.
9. CEMENT BURNS are a constant hazard in construction work, particularly in warm weather. Take appropriate measures to ensure cement does not get inside your boots or gloves. Wash off any cement and/or concrete that gets on hands, arms or face as soon as possible. Report any burns, no matter how slight, to your foreman.
10. FIRE EXTINGUISHERS, CELL PHONES, and FIRST AID KITS – know where they are and how to use them in emergencies.

January 2025

11. VIOLATION of OSHA, state and local regulations and/or Company Safety Policy may be cause for DISCIPLINARY ACTION, UP TO AND INCLUDING TERMINATION.
12. GOOD HOUSEKEEPING promotes safe and efficient work. Do not allow trash such as scrap, metal, wire, block or building materials with protruding nails lie in your work area. Keep job sites, walkways, exits, stairs, and landings clear. Keep fire extinguisher locations clear of obstacles.
13. EQUIPMENT and VEHICLES are to be inspected and a Driver Vehicle Inspection Report (DVIR) created prior to use to assure that they are in proper operating condition. In addition, vehicle cabs must be kept clean and clear of garbage, unnecessary personal items, etc.

For additional safety rules and procedures, refer to the CP Ward Health & Safety Program (HASP).

SAFETY VIOLATION

Violation of a safety measure is in itself an unsafe act. A violation will be grounds for disciplinary action, the extent of which will be determined by the nature of the violation, but may include termination.

5.02 ALCOHOL & DRUG-FREE WORKPLACE

The Company strives to provide a safe environment for employees and others and to minimize the risk of accidents and injuries. Accordingly, each employee has a responsibility to co-workers and clients to deliver services in a safe and conscientious manner. As a condition of employment with our Company, all employees are required to fully comply with the provisions of this policy.

DEFINITION OF CONTROLLED SUBSTANCES

"Controlled substances" are defined as those drugs listed in Schedules I through V of Section 202 of the Federal Controlled Substances Act, 21 U.S.C. 812 and include, but are not limited to: marijuana, cocaine (including "crack" and other cocaine derivatives), morphine, codeine, phenobarbital, heroin, amphetamines and many barbiturates.

UNAUTHORIZED PRESENCE OF CONTROLLED SUBSTANCES AND/OR ALCOHOL IN THE WORKPLACE

The unauthorized or illegal use, sale, purchase, possession, distribution, dispensation, formulation, manufacture or transfer of controlled substances, marijuana or alcohol on Company property or any location at which Company business is conducted, including Company vehicles and any private vehicle parked on Company premises or work sites, is strictly prohibited.

Employees suspected of drug and/or alcohol abuse may be required to submit to a urinalysis or blood alcohol examination, and when appropriate will be sent home. Employees failing to agree to urinalysis or blood alcohol examination may be subject to immediate termination.

PRESCRIPTION AND OVER-THE-COUNTER DRUGS

This policy does not prohibit the possession and proper use of lawfully prescribed or over-the-counter drugs. However, an employee taking medication should consult with a health care professional or review dosing directions for information about the medication's effect on the employee's ability to work safely, and promptly disclose any work restrictions to Human Resources. Employees are not required to reveal the name of the medication or the underlying medical condition. The Company will evaluate and respond to this information on a case-by-case basis and be consistent with its reasonable accommodation process. Consistent with applicable policies, the Company will maintain the confidentiality of the information provided.

The Company reserves the right to transfer, reassign, place on leave of absence or take other appropriate action regarding any employee during the time the employee uses medication that may affect their ability to perform safely. The Company will comply with all requirements pertaining to providing reasonable accommodations to the extent required by applicable law.

Any employee who cannot work safely, and who does not advise the Company about warnings accompanying lawfully prescribed or obtained medications, will be subject to disciplinary action up to and including possible termination of employment. An employee's lack of knowledge concerning such warnings will not excuse a violation of this rule where an employee has failed to make the inquiries required by this policy.

TESTING

The Company has implemented a drug testing program in compliance with federal, state, and local law. In accordance with employee safety standards, all CP Ward employees participate in random drug and alcohol testing. This program is administered by an outside agency. All CDL drivers are tested in accordance with the Federal Motor Carrier Safety Regulations 49 CFR part 40. Employees who refuse to participate when selected may be discharged. In addition, the following will apply:

1. Possession, Transportation, Sale, Distribution, Use: The possession, sale, distribution, or use of illegal drugs, controlled substances, marijuana and/or alcohol by anyone while on CP Ward property or CP Ward business will be cause for immediate discharge. Illegal substances will be confiscated, and the appropriate law enforcement agencies notified.
2. Employees may be subject to "for cause" testing under any of the following circumstances: Personal injury, automobile accident involving company vehicle, and accident involving personal injury or damage to property.
3. When reasonable suspicion exists, CP Ward reserves the right to carry out searches of employees and their property, including but not limited to, briefcases, bags, lunch boxes, purses, and private vehicles, if on CP Ward

January 2025

- property or conducting CP Ward business. Failure to comply may result in immediate termination.
4. Employees suspected of drug and/or alcohol abuse may be required to submit to a urinalysis or blood alcohol examination, and when appropriate will be sent home. Employees failing to agree to urinalysis or blood alcohol examination may be subject to immediate termination.
 5. Employees who demonstrate “articulable symptoms” of marijuana use or impairment (as observed and confirmed by two CP Ward managers) may be subject to disciplinary action, up to and including termination, without drug testing.

EMPLOYEE ASSISTANCE PROGRAM (EAP)

CP Ward provides an EAP for employees and their family members. Employees are encouraged to use the EAP whenever they feel the need to discuss personal issues. For employees who have difficulty handling drugs or alcohol, the EAP can provide information on treatment. The EAP is a confidential service.

VIOLATION OF POLICY

Violations of this policy will lead to disciplinary action, up to and including termination.

5.03 WORKPLACE SEARCHES

In order to ensure the safety of the workplace, prevent theft of Company and personal property and/or enforce Company policies, unless otherwise prohibited by applicable law, CP Ward reserves the right to conduct searches of any person, vehicle or object on Company property with or without reasonable suspicion that a policy or legal violation has occurred.

SEARCHES

Please be aware that the Company reserves the right to search lockers, desks, files or file cabinets, briefcases, baggage, toolboxes, lunch bags, clothing, purses, vehicles parked on Company property and any other item in which dangerous, stolen or unauthorized objects may be hidden. Additionally, the Company may search Company-owned vehicles that are primarily used by the employee, regardless of whether the vehicle is located on Company property at the time. Searches may be conducted by Company management. The Company also reserves the right to authorize searches by law enforcement on its property with or without the employee being present.

5.04 BUILDING SECURITY

The security of CP Ward’s offices and facilities is of the utmost importance. To control building security, all visitors who require access to our facilities must be accompanied by an authorized employee.

VISITORS

Visitors requiring access to CP Ward's offices are to be met in the reception area by an authorized employee, escorted while in the building, and accompanied back to the reception area when leaving the building. Visitors should only have access to the areas/offices within the building that are needed to conduct business.

DELIVERIES

Delivery people are seldom thought of as visitors, but they are and should be treated as any other visitor.

PROHIBITED ITEMS

The following articles may not be brought onto Company premises:

- Firearms, weapons, explosives;
- Narcotics, other unauthorized controlled substances, marijuana or alcoholic beverages; and
- Other items similar in effect or purpose to any of the above, as well as items which may be considered illegal under federal, state or local laws or contrary to standard industrial practice.

Any personal items brought on the premises are subject to inspection as necessary to protect Company property and personnel.

5.05 EMERGENCY EVACUATION

CP Ward is committed to ensuring employees understand their roles and responsibilities in the event of an emergency.

IN AN EMERGENCY

In the event of a fire or hazardous material emergency, the emergency fire alarm system should be activated by pulling one of the fire alarms. The source of a potential fire or hazardous material emergency should not be investigated. Any employee who suspects an emergency should report it immediately. In any emergency, reporting is the first essential step to protecting oneself and others.

When the emergency fire alarm system is activated, all employees and visitors are expected to evacuate the building by exiting in an orderly manner through the nearest exit.

When exiting, employees should exit in an orderly manner. After exiting, employees should report to the area away from the building exits designated as the meeting location. Once employees arrive at the designated area, they should immediately report to their manager and remain at that location until accounted for and authorized to leave.

No reentry to the building will be permitted until an official all-clear notification is given.

January 2025

EMPLOYEES' RESPONSIBILITY

All building security information including, but not limited to security codes, should be kept confidential. Doorways should not be propped open while unattended. Employees may not allow unauthorized visitors within the premises.

Employees should review this policy and the evacuation procedures and notify Human Resources if they believe they might require an accommodation or assistance in order to comply with these procedures in the event of an emergency.

5.06 SMOKE-FREE AND TOBACCO FREE WORKPLACE

The following smoking provisions have been adopted in the interest of providing a safe and healthy environment for both employees and visitors to our building.

SMOKING RESTRICTIONS

Smoking, including E-cigarettes and chewing tobacco, is not permitted in Company work areas and buildings, including Company-owned vehicles. Smoking is allowed only in designated areas outside of the building, which must be a minimum of 25 feet from an entrance.

It should also be noted that various job sites we work on may be hazardous waste sites. Smoking is prohibited on all hazardous waste sites and in any situation involving flammable chemicals or materials. Many clients we work for have their own smoking policy that must be followed as well.

COMPLIANCE

Employees who violate this policy are subject to disciplinary action, up to and including termination.

5.07 VIOLENCE IN THE WORKPLACE

CP Ward is committed to providing a safe environment for employees, clients, and visitors. The Company has a zero-tolerance policy concerning workplace violence. Employees who display any violence or threaten violence, including talk of committing violence or joking about committing violence in the workplace, are subject to disciplinary action, up to and including termination.

DEFINITION

Violence in the workplace includes, but is not limited to, physically harming another or one's self, shoving, pushing, brandishing weapons and explicit or implicit threats or talk of committing violence.

January 2025

WEAPONS

All employees are prohibited from carrying a weapon while in the course and scope of performing their jobs for CP Ward, whether they are on Company property at the time or not, and whether they are licensed to carry a handgun or not. This policy also prohibits weapons at any Company-sponsored functions such as parties or picnics.

Unless this prohibition is contrary to state or local law, the workplace specifically includes Company parking areas and Company vehicles. Employees are not permitted to transport or store weapons in vehicles owned or leased by the Company and used by the employee for work purposes.

This prohibition specifically includes guns, rifles and firearms of any type, including those for which the holder has a legal permit. Other examples of prohibited weapons include, but are not limited to knives, ammunition, bombs, bows and arrows, clubs, slingshots, blackjacks, metal knuckles and similar devices that by their design or intended use are capable of inflicting serious bodily injury or lethal force. Products such as mace, pepper spray and other defense devices including stun guns and tasers are also prohibited.

Failure to abide by this policy may result in disciplinary action, up to and including termination. Further, carrying a weapon onto Company property, in violation of this policy, will be grounds for immediate removal from Company property and may result in prosecution. This policy shall not be construed to create any duty or obligation on the part of the Company to take any actions beyond those required of an employer by existing law.

REPORTING VIOLENCE

It is everyone's responsibility to prevent violence in the workplace. Employees must immediately report what they see or hear in the workplace that could indicate that a co-worker may be a threat to the safety of the workplace. Employees should report any incident that may involve a violation of the Company's policies that are designed to provide a safe workplace environment. Concerns may be presented to the employee's manager or any other member of management.

REPORTING DOMESTIC VIOLENCE

Domestic violence perpetrated by or against an employee of the Company is considered a workplace issue as these situations may create safety concerns within the workplace. Employees are encouraged to report if they are the victim of domestic violence, or if they suspect that a co-worker may be the target of or the perpetrator of domestic violence, to Human Resources. Managers made aware of employee-related domestic issues are encouraged to immediately notify Human Resources.

Employees who obtain or are the subject of a restraining order are encouraged to immediately notify Human Resources, so the Company may assist in preventing an individual who may display or carry out an act of violence from obtaining access to Company premises.

Employees who have questions or concerns related to domestic violence may contact Human Resources. Employees experiencing issues with domestic violence may also contact the National Domestic Violence Hotline at 1-800-799-7233.

REPORTING SUICIDAL THOUGHTS AND BEHAVIOR

Self-harm may be considered a form of violence. Employees who are having thoughts of suicide or become aware of a co-worker having suicidal thoughts and/or displaying suicidal behavior should immediately notify Human Resources. Managers made aware of suicidal ideation by an employee must immediately notify Human Resources.

Employees who have questions or need assistance with the topic of suicide may contact Human Resources. Employees who need assistance may also contact the National Suicide Prevention Lifeline by dialing 988.

If there is a concern of imminent harm, employees should contact the local police department by dialing 911.

EMPLOYEE ASSISTANCE PROGRAM (EAP)

CP Ward provides an EAP for employees and their family members. Employees are encouraged to use the EAP whenever they feel the need for guidance with personal problems, including difficulty handling drugs or alcohol. The EAP is a confidential service that can provide information on counseling or treatment.

CONFIDENTIALITY AND RETALIATION

It is the policy of CP Ward that any employee making a report or participating in the investigation of workplace violence will not be retaliated against in any way. Reports will be investigated promptly, and confidentiality will be maintained to the greatest degree possible, consistent with our obligation to thoroughly investigate the allegation and consistent with applicable law and the need to facilitate an investigation and/or a solution to the problem. Employees who feel that they have been retaliated against for reporting workplace violence, domestic violence or suicidal behaviors, or for participating in the investigation of an alleged incident, should contact Human Resources.

CORRECTIVE ACTION

If a report of workplace violence is found to be valid, immediate, and appropriate corrective action will be taken. Employees who violate this policy, including the provision against retaliation, will be subject to disciplinary action up to and including termination. This determination will be based on all the facts of the case.

5.08 PANDEMIC ILLNESS

CP Ward strives to maintain a safe workplace and protect the health of employees, clients, visitors or others in the event of a severe pandemic illness like influenza or COVID-19. CP Ward also wants to ensure the continuity of business operations in the event of a severe pandemic illness. Efforts for an effective response will be guided by and in accordance with all applicable federal, state and local laws and guidelines issued by

public health authorities such as the Centers for Disease Control and other governmental agencies.

INFLUENZA PREVENTION

All employees are asked to cooperate in taking steps to reduce the transmission of pandemic illness in the workplace. We encourage employees to assist in reducing the transmission of pandemic illness by frequent hand washing with warm, soapy water, using hand sanitizer, covering mouths with tissues when sneezing and discarding tissues used when sneezing.

STAYING HOME WHEN ILL

CP Ward provides employees with time off and other benefits to compensate employees who are unable to work due to illness. During flu season and/or some other pandemic illness, it is critical that employees do not report to work while they are ill and/or experiencing influenza-like symptoms such as: fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills, diarrhea, vomiting and fatigue. The Centers for Disease Control and Prevention has recommended that people with influenza-like illness remain at home until at least 24 hours after they are free of fever (100 degrees F or 37.8 degrees C) or signs of a fever without the use of fever-reducing medications.

WORK SCHEDULES

A severe pandemic illness could result in a significant level of absenteeism. Some employees may be unable to work if they become ill due to the virus while others may need to remain home to care for ill family members or to provide care for children during school closings. During this time, unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during a severe pandemic illness should take steps now to develop any necessary contingency plans.

For example, employees might want to arrange for alternative sources of childcare should schools close and/or speak with their manager about the potential to work from home temporarily or on an alternative work schedule if necessary.

CONFIDENTIALITY OF MEDICAL INFORMATION

Our policy is to treat any medical information obtained from an employee or an employee's health care provider, including any voluntary disclosure that the employee has contracted influenza or COVID-19, as a confidential medical record. In furtherance of this policy, any disclosure of influenza or COVID-related medical information will be shared only on a need-to-know basis and only as necessary to prevent or slow the spread of the illness at work, while maintaining confidentiality to the extent reasonably possible. Information will be shared with government officials only if required by law.

ADDITIONAL INFORMATION

Please see Human Resources for additional information.

5.09 AIRBORNE INFECTIOUS DISEASE EXPOSURE PREVENTION PLAN

The purpose of this plan is to protect C.P. Ward, Inc. (“Company”) employees against exposure and disease during an airborne infectious disease outbreak. **This plan goes into effect when an airborne infectious disease is designated by the New York State Commissioner of Health as a highly contagious communicable disease that presents a serious risk of harm to the public health.** This plan is subject to any additional or greater requirements arising from a declaration of a state of emergency due to an airborne infectious disease, as well as any applicable federal standards. Should a designation be announced, CP Ward will distribute its HERO Act policy in accordance with the applicable regulations.

**EMPLOYEE PROGRAMS
&
PROCEDURES**

6.01 CLIENT RELATIONS

The professional treatment of our clients and the impression that we make on our community are important. Our Company's reputation is based on product excellence and quality service. To maintain our reputation as an industry leader requires the active participation and cooperation of every employee.

EMPLOYEES' RESPONSIBILITY

The opinions and attitudes that clients and potential clients have toward our Company may be determined for a long period of time by the actions of one employee. Employees must be sensitive to the importance of providing courteous treatment in all working relationships.

QUALITY SERVICE

Quality service can only be achieved when every employee understands that clients are critically important to the success of our Company.

Some of us have internal clients (co-workers) for whom we provide service and some of us work with individuals outside the Company who have given us the privilege of their business. In both situations, we are committed to providing quality service and a high level of professionalism at all times.

6.02 MEDIA RELATIONS

Communication with news reporters and other journalists is, at times, sensitive in nature. Therefore, media requests for official statements from the Company may be handled only by designated senior managers.

MEDIA REQUESTS FOR OFFICIAL STATEMENT

Any telephone calls, electronic communications or visits from members of the media requesting the Company's official statement should be directed to the Legal Department or Human Resources.

6.03 PROFESSIONAL ATTIRE

The impression that we make on visitors to CP Ward is important. There is no substitute for neatness, propriety of dress, good grooming and speech and a professional attitude. Sensitivity to these areas will ensure that our good relationships with clients are maintained and fostered.

DRESS CODE

January 2025

Although no formal dress code exists, employees are asked to wear clothing that is appropriate for their position and the work that they do. Clothing should be neat, clean, in good taste and not constitute a safety hazard.

Appropriate safety attire (i.e. shoes, gloves, safety glasses, etc.) must be worn as prescribed in the CP Ward Health & Safety Program (HASP) or by management. Refer to OSHA regulations on flame retardant clothing.

CP Ward will make accommodations when necessary to comply with federal and/or state law, including accommodations for religious and medical reasons, as long as such accommodations are reasonable and do not impose an undue hardship on the Company. Please contact Human Resources with questions regarding this policy, or if you require an accommodation

6.04 SUGGESTION PROGRAM

Suggestions for improving the operations of our Company are welcomed and encouraged. We believe capable people with good ideas and creative solutions are working throughout our Company and we welcome their participation in our continuous improvement.

WHAT IS A SUGGESTION

Normally, any idea that an employee has for improving our Company may be submitted as a suggestion. Employees who believe they have a good idea should ask themselves these questions: will it strengthen our operations or service; will it make us more responsive to our clients? Discussing a problem without offering a practical solution is not a suggestion.

PUT THE SUGGESTION IN WRITING

It is recommended that suggestions be put into writing and given to the employee's manager for review. Suggestions cannot be anonymous; an author must be required in all situations. After investigating the suggestion, the employee may be informed whether or not it is feasible to put into practice. Suggestions become the property of CP Ward.

RECOGNITION

Management believes that suggestions indicate initiative on the part of an individual.

ADDITIONAL INFORMATION

Additional information on the processing of suggestions is available from Human Resources.

6.05 COMMUNICATIONS

Regular, reliable communications between and among employees is critical to the effective management and operation of the Company and is the responsibility of all. The

January 2025

Company shall provide to each employee resources sufficient to allow such communication to take place on a timely basis, as each employee's responsibilities require. Such resources may include one or more of the following: laptop computer; access to office computer; cell phone; desktop phone. In the event the Company requires the employee to use his or her personal electronic or telephonic communication device for Company-related communication, it shall cover the proportionate cost. All employees shall monitor Company communications on a regular basis and respond to the same in a timely fashion.

All Company electronic communication systems are purchased, installed, and intended for Company purposes. Use of these resources shall be consistent with the business operations and goals of the Company. In addition, Company resources must be used in accordance with federal, state and local laws and company policies (i.e. copyright laws, software licenses, Non-Harassment Policy, etc.).

The use of e-mail for personal reasons should be on a limited basis, outside of normal work hours. An employee shall have no expectation of privacy with respect to his or her use of any Company communications equipment or systems, including email, texting, and the like. Use of these systems indicates an employee's consent to the Company's monitoring of all activity on the systems.

The e-mail system is not to be used to solicit customers, co-workers, etc. on non-work-related matters. Sending content containing language or images that are abusive, sexually explicit, slanderous, discriminatory, harassing, demeaning, or threatening in nature is not permitted. If it is suspected that an employee has engaged in any behaviors of this sort, the Company President or Vice President can approve the monitoring of resources and/or inspection of data.

Each network user must log in and out using his or her own username and password. Any activity associated with a username is considered that user's responsibility; therefore, passwords should be kept private. Likewise gaining entry into another individual's computer account is considered unauthorized access and subject to disciplinary action.

All software, software licenses, associated media and documentation purchased by the Company are the property of the Company and may not be used for personal reasons.

6.06 PERSONAL CALLS & PERSONAL ELECTRONIC DEVICES

While employees are at work, they are expected to perform their job duties and responsibilities. Personal calls and the use of electronic devices should take place primarily outside of working time. For purposes of this policy, "working time" is defined as the time during which employees are performing work or are actually scheduled to work, but does not include scheduled rest periods, meal breaks and other specified times when employees are not expected to be working.

January 2025

PERSONAL CALLS

Personal calls made using the Company's telephones, including Company-provided cell phones, should be limited to business purposes. However, the Company recognizes that employees may occasionally need to use Company telephones, including Company-provided cell phones, for non-business-related matters.

Employees are requested to keep all personal calls to an absolute minimum and, except in the case of an emergency, place calls during non-working periods. The abuse of this privilege would interfere with the efficiency of our operations.

PERSONAL ELECTRONIC DEVICES

Although the Company permits employees to bring personal electronic devices, including cellphones, tablets and other portable devices, into the workplace, employees are expected to remember that working time is for work. Therefore, employees should only use personal electronic devices (such as engaging in personal phone calls) during non-working time, including meal and rest breaks. Outside of this time, use of personal devices should be kept to a minimum and for emergencies only.

Personal electronic devices may be used to play music during working time as long as the devices are not distracting to others and do not interfere with work performance. Employees are required to wear headphones/earbuds when listening to a personal electronic device.

ELECTRONIC DEVICES

Personal electronic devices may be used to play music during working time as long as the devices are not distracting to others, do not interfere with work performance, and do not become a safety hazard. Depending on the employee's position and if safety is impacted by doing so, employees may not be allowed to wear headphones when listening to a personal electronic device. Employees should receive management approval before wearing headphones and/or using any electronic devices during working hours. For purposes of this policy, "working time" is defined as the time during which employees are actually scheduled to work, but does not include scheduled rest periods, meal breaks and other specified times when employees are not expected to be working.

USE OF ELECTRONIC DEVICES WHILE DRIVING

Employees are required to take all necessary safety precautions and follow all relevant traffic laws while driving. The use of cell phones and portable electronic devices while driving can be a distraction, and CP Ward prohibits distracted driving. Employees must take full responsibility for paying attention to the road and are solely responsible for all traffic violations and all liabilities that may result from their actions while operating a vehicle for work.

ADDITIONAL INFORMATION

If personal calls and/or use of personal devices becomes excessive, employees may no longer be able to use their personal devices during work hours. Failure to comply could lead to disciplinary action up to and including termination of employment.

January 2025

6.07 CORPORATE CREDIT CARDS

The Company provides a corporate credit card to certain employees to be used for business-related purposes. Corporate credit cards cannot be used for personal expenses.

ELIGIBILITY

Employees may be assigned a corporate credit card as necessary when approved by the President.

Increases to the established maximum credit-limit may be made on a case-by-case basis by the President.

EMPLOYEES' RESPONSIBILITY

Corporate credit card expenditures must be reconciled and submitted with original receipts to Accounting at least one week prior to the credit card payment due date or within five business days of the statement date.

Cardholders who have not reconciled and submitted their monthly expenditure within this period will be asked to reconcile and submit their monthly expenditure immediately. Continued or repeated non-conformance to this policy will result in cancellation of the card and such other actions as appropriate. If the card expenditures are not reconciled and submitted within the time period established above or a plausible explanation has not been received by Accounting, the employee's corporate credit card will be cancelled.

Lost or stolen cards must be reported immediately to Accounting or the Credit Card Administrator.

ADDITIONAL INFORMATION

Misuse of the card will result in cancellation of the card and withdrawal of corporate credit card privileges. Misuse may also result in discipline, up to and including termination.

Contact Accounting or the Credit Card Administrator with any questions regarding this policy.

6.08 OUTSIDE EMPLOYMENT

The Company does not prohibit employees from holding other employment. If the need arises, employees may accept outside employment providing the following provisions are observed.

CONFLICT OF INTEREST

Outside employment must not interfere in any way with an employee's work schedule, job duties and responsibilities to our Company or create an actual or perceived conflict of interest.

January 2025

The following are examples of conflicts of interest:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor or other business entity that engages in business with the Company;
- Owning a material interest in, being a creditor of or having other financial interest in a supplier, client, competitor or other business entity that engages in business with the Company;
- Receiving from or giving to any supplier, client or competitor gifts, gratuities, special allowances, discounts or other advantages not generally available to employees of the Company;
- Having any significant direct or indirect personal interest in a business transaction involving the Company;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's services for the Company; or
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on the Company or its business.

NOTIFICATION

If an employee finds that they have, or are considering the assumption of, a financial interest, an outside employment relationship or other activity that might involve a conflict of interest, as discussed in this policy, or if the employee is in doubt as to whether any conduct or activity may constitute a conflict of interest, the employee must promptly discuss the matter with Human Resources and refrain from acting on the Company's behalf in any manner that might reasonably be considered to be a conflict of interest or affected by any adverse interest. If the matter is deemed to be a conflict of interest, the affected employee must withdraw from the matter.

ADDITIONAL INFORMATION

The Company will not assume any responsibility for an employee's outside employment. Specifically, the Company will not provide workers' compensation coverage or any other benefit for injuries occurring from, or arising out of, such outside employment.

6.09 SEVERE WEATHER

Inclement weather is to be expected during the winter months. Driving, although rarely impossible, may be difficult at times. When caution is exercised, the roads are normally passable.

The nature of our work requires that employees frequently work during severe weather. CP Ward services must be provided regardless of the weather. If an employee is unable to get to their normal work location due to severe weather, the employee must contact management immediately. Employees will be given instructions about any alternate assignment.

NOTICES OF OFFICE CLOSINGS

January 2025

Except in cases of severe storms, we will work regular hours. Any alteration in our regular schedule will be decided by department managers and communicated by phone and by e-mail.

ABSENCES DUE TO POOR WEATHER

Time taken off by employees due to poor weather conditions when the Company remains open must be taken as benefit time or unpaid time unless otherwise required by federal or state wage and hour laws.

6.10 ELECTRONIC RESOURCES

This policy describes the Company's general guidelines for using its electronic resources, including electronic mail (email), voicemail, Internet access and computer systems.

IMPROPER USE

Employees should use the Company's electronic resources with the understanding that these resources are provided for the benefit of the Company's business.

Employees should never use the Company's electronic resources for personal use in a manner that interferes with their work duties or any responsibilities to clients.

Sending, saving, accessing, or viewing obscene or similarly offensive material on the Company's electronic resources is prohibited. Messages stored and/or transmitted by the Company's electronic resources, including the computer, voicemail, email or the telephone system, must not contain content that may reasonably be considered to be obscene or other patently offensive material. Prohibited material includes, but is not limited to, sexual comments, jokes or images related to legally protected classifications, racial slurs, gender-specific comments, or any comments, jokes or images that would discriminate against or harass someone on the basis of their race, color, sex, age, national origin or ancestry, disability, or any other category protected by federal, state or local law. Likewise, any use of the Internet, email or any other electronic resource to engage in harassment or discrimination prohibited by Company policies is unlawful and strictly prohibited. Violators may be subject to discipline, up to and including termination of employment.

Unless otherwise noted, all software on the Internet should be considered copyrighted work. Therefore, employees are prohibited from downloading software and/or modifying any such files without permission from the copyright holder.

NO SOLICITATION

The Company's electronic resources must not be used for solicitation purposes during working time. The Company's no solicitation rule applies to the use of electronic resources.

SOFTWARE CODE OF ETHICS

Employees may not duplicate any licenses, software or related documentation for use either on the Company's premises or elsewhere unless the Company is expressly authorized to do so by agreement with the licensor. Unauthorized duplication of software may subject users and/or the Company to both civil and criminal penalties under the United States Copyright Act. Employees may not give software to any outsiders including contractors, clients or others without approval from Management. Employees may use software on local area networks or on multiple machines only in accordance with applicable license agreements. Employees may not download software from the Internet and install it on their computers.

The Company reserves the right to audit any Company computer to determine what software is installed on the local drive(s).

EMPLOYEE'S RESPONSIBILITY

Each employee is responsible for the content of all text, audio or images that they place or send using the Company's electronic resources. The same standards should be utilized for the creation of email messages in connection with an employee's work as would be utilized for other Company correspondence or memoranda.

COMPUTER AND SYSTEMS SECURITY

All computers and the data stored on them are, and remain at all times, the property of CP Ward. As such, all messages created, sent or retrieved over the Internet or the Company's electronic mail systems are the property of the Company and should be considered Company information. The Company reserves the right to retrieve and read any message composed, sent or received using the Company's electronic resources, including all computer equipment and the electronic mail system, for any business reason, including but not limited to, ensuring compliance with this and all Company policies.

Employees should be aware that even when a message is deleted or erased, it is still possible to recreate the message; therefore, ultimate privacy of a message cannot be ensured to anyone. Accordingly, Internet and email messages are not private. Furthermore, all communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

Employees should also be aware that duplicates of email transmitted through a personal, web-based email account using Company equipment could be stored on that equipment; likewise, information regarding Internet sites that an employee has accessed may also be stored.

EMAIL CONTENT SCREENING

The Company maintains the right to screen all inbound and outbound email content. Email messages or attachments that contain obscene or similarly offensive material may be quarantined and held from transmission or receipt until the sender or recipient can verify the message or attached document is work-related.

The Company may, in its discretion, review communications to and from a personal account, subject to applicable state laws.

If an employee wants to communicate with an attorney or send an otherwise confidential piece of communication that they do not want the Company to monitor, the employee should consider using a personal email address and personal computer equipment. If an employee does use Company equipment, they consent to any monitoring by the Company and should understand that they have no right to privacy with respect to such communications, to the extent permissible under applicable law.

ELECTRONIC MONITORING

Employees are advised that any and all telephone conversations or transmissions, electronic mail or transmissions, or internet access or usage by an employee by any electronic device or system, including but not limited to the use of a computer, telephone, wire, radio or electromagnetic, photoelectric or photo-optical systems may be subject to monitoring at any and all times and by any lawful means.

VIRUS PROTECTION

To prevent computer viruses from being transmitted through the system, employees are not authorized to download any software from the Internet onto their computer or any drive in that computer.

The Company maintains virus protection software on all network servers and filters all inbound and outbound email for virus attachments. Email containing a virus will be quarantined and both the sender and recipient will be informed. If the virus can be removed, the message will be forwarded to the recipient.

6.11 BULLETIN BOARDS

CP Ward maintains bulletin boards for the posting of official notices relating to CP Ward business, job opportunities, sponsored activities and federal and state regulations.

GENERAL

Information of interest and importance is regularly posted on our bulletin boards. Make a point to look at these resources regularly to keep up with "what's happening." These bulletin boards and collaborative platforms are for administrative use only, so employees may not post or remove any items on them without prior review and approval from management.

6.12 CHANGES IN PERSONAL INFORMATION

Employees are responsible for notifying the Company when there is a change in their personal data. This information needs to be kept up to date, so benefit plans and payroll withholdings are properly administered. Timely notification of these changes will also enable CP Ward to assist employees and their family in matters of personal emergency.

SELF-SERVICE

January 2025

Employees should update information with Human Resources if any of the following change:

- Name
- Address
- Telephone numbers
- Number of dependents
- Change in familial status and/or beneficiaries
- Emergency contact

6.13 PERSONNEL FILES

The Company maintains an official personnel file for each employee that contains necessary job-related and personal information. These files are confidential, and guidelines exist to safeguard against improper disclosure.

ACCESS TO PERSONNEL FILE

Current employees may see information kept in the company personnel file if they wish, except for confidential materials such as job references or information relating to other employees. Employees may make arrangements with Human Resources to see these documents. Employees may request and receive copies of all documents they have signed at the time they are signed. Employees may not independently access, alter, or remove documents from company personnel files.

Internal availability and access to personnel files is limited to those with proper authorization and a business need to know.

INQUIRIES ABOUT EMPLOYEES

All inquiries or requests for information about employees (active or inactive) from people outside the Company should be referred to Human Resources. This applies to all requests, whether written or verbal.

In some cases, employers are required by federal, state or local law to disclose information to the government or other authorized entities, even if CP Ward would ordinarily keep such information confidential. CP Ward will comply with all laws which require disclosure of employee information upon receipt of a properly authorized request.

PROTECTION AND DISPOSAL OF PERSONAL RECORDS

CP Ward is committed to ensuring that records containing personal identifying information are protected and disposed of in accordance with state law. Personal information is disposed of in a manner that ensures no unauthorized person will have access to employee personal information.

6.14 PROTECTION OF EMPLOYEE PERSONAL INFORMATION

CP Ward recognizes and respects the privacy of applicants, employees and others with regard to personal information it obtains through the hiring process and the employment relationship.

PERSONAL IDENTIFIABLE INFORMATION (PII)

As evidence of our commitment in this regard, this policy provides information regarding the processing of personal information about employees and describes the Company's general practices regarding employee privacy. Since privacy laws and business practices vary from state to state, implementation of these practices may also vary to accommodate local rules. This may involve adopting different standards as required by local law or diverging from the principles set out in this policy where CP Ward is not required to follow particular practices either by local law or by contractual commitments. CP Ward will only engage in variation from these principles if CP Ward has a legitimate, business or legal reason to do so and not in an arbitrary or capricious manner.

This policy regulates collection and use of information about CP Ward's prospective, current and former employees and the limited amount of personal information that CP Ward may collect about employee family members (together, all deemed employee personal information). References in this policy to employees should be interpreted accordingly. The policy is not limited to information held by Human Resources. The policy regulates all employee personal information held by CP Ward.

Where CP Ward collects employee personal information, it will take steps to inform the employees concerned of the purposes for which the information will be used and provide them with any further information that is necessary to ensure that the employee personal information is used fairly. For example, where employees are asked to provide personal information about themselves, CP Ward will explain whether provision of the information is mandatory or voluntary and any consequences of not providing the requested information.

Notification to employees need not be provided, however, where:

- The employees concerned already have sufficient information (for example, through this policy or other CP Ward policies or general notices); or
- Employee personal information is not collected directly from the individual concerned and to contact that individual directly would be disproportionate (for example, where an employee provides information about their family member, CP Ward will not usually contact the family member).

The following paragraphs set out general information about the Company's collection and use of employee personal information. This information is not intended to be comprehensive:

Purposes

Human Resources collects and uses employee personal information to process payroll payments, to determine benefits eligibility and process benefit payments, to analyze compensation costs and training needs and to determine employee eligibility for different responsibilities. Depending on which business unit an employee works for, additional information may be collected for purposes of complying with regulatory requirements. Information may also be collected to meet legally mandated obligations (such as tax and U.S. Equal Employment Opportunity requirements), to ensure compliance with CP Ward policies, and to protect the Company, the workforce and the public against injury, theft, legal liability, fraud or abuse. Information (such as emergency contact information) is also collected from employees for use in connection with disaster recovery and business continuity efforts.

Disclosures and International Transfers

Employee personal information may be shared between the Company and its service providers. Without intending to provide an exhaustive list of examples, it may be disclosed in connection with legal proceedings, investigations, or as required by law, regulation or relevant authority. It may also be disclosed to prospective buyers, business partners or other transferees of the business unit in which an employee works in the event of a potential sale, transfer or joint venture involving the unit or the investigation/negotiations which precede the transaction. This sharing, and these other disclosures, may involve transfers of personal information to any country in the world, including to countries which do not have strong data privacy laws. The Company will, nevertheless, use all reasonable commercial efforts to protect employee personal information in accordance with this policy.

Fair Processing Principles

The Company will only collect and use employee personal information fairly and lawfully. The Company will take reasonable steps to ensure that it does not collect or use irrelevant, excessive, or inadequate employee personal information and that the employee personal information it holds is accurate and, where relevant, up to date.

In particular, the Company will only collect and use employee personal information:

- As necessary for the purposes of its legitimate interests which are not overridden by the rights, freedoms or legitimate interests of the employees concerned; or
- With the consent of the employees concerned; or
- Where the collection or use has been approved by the Company's Legal Department as justified under applicable data privacy law.

Security

The Company will use commercially reasonable efforts to ensure that it has in place appropriate technical and organizational security measures to protect employee personal

information against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and all other unlawful forms of processing.

In particular, where the Company contracts with third party service providers to collect and/or process employee personal information on its behalf, it will ensure that the service providers are bound by written agreements requiring them to process the information only on the instructions of the Company and to have appropriate technical and organizational security measures in place to protect the information.

Retention and Destruction

The Company will follow data retention and destruction policies and processes designed to ensure that employee personal information is deleted when it is no longer needed for the purposes for which it is collected and used.

Direct Marketing

The Company will not share employee personal information for direct marketing purposes outside of the Company.

MORE INFORMATION

Employees who have a reason to believe that their PII and/or the Company's proprietary data has been breached should notify Human Resources. Employees should also notify Human Resources if they have knowledge of any Company representative not adhering to this policy.

Violations of this policy may result in disciplinary action, up to and including termination of employment.

6.15 SOCIAL MEDIA

CP Ward recognizes that many employees engage in social media activity. This policy establishes a set of rules and guidelines for any activity and participation in "social media" by all CP Ward's employees. These rules are intended to be adaptable to the changes in technology and norms of online communication and behavior, and may be amended by CP Ward at any time, for any reason. This policy also applies to social media activity when on or off duty, while using the Company's or personal electronic resources, and whether the employee posts anonymously or using a pseudonym.

DEFINITIONS

For purposes of this policy, "social media activity" includes any website or forum that allows for open communication on the internet, including, but not limited to, postings on social networking sites, such as Facebook, Instagram, Snapchat and LinkedIn; blogs and other on-line journals and diaries; bulletin boards and chat rooms; microblogging, such as X (formerly known as Twitter) or Threads; and postings of video or audio on media-sharing sites, such as YouTube or TikTok.

The term “social media” applies to any web-based and mobile technologies, in use now or developed in the future, that enable individuals or entities to disseminate or receive information, communicate or otherwise interact and includes, without limitation, email, texting, messaging, social networking, blogging, micro-blogging, bulletin boards and so on.

PERSONAL OPINIONS

Employees should express only personal opinions online and should never represent themselves as a spokesperson for CP Ward unless given explicit permission or approval to do so. Employees who choose to post online content relating to CP Ward should make it clear that they are not speaking on behalf of CP Ward.

FOLLOW EXISTING POLICIES AND TERMS OF USE

Employees are required to observe and follow: (a) existing CP Ward policies and agreements, such as our Employee Handbook; (b) the policies and terms of use of the particular social media forum or service that is being used; and (c) applicable laws and regulations. This means that employees should not use social media to post or display comments that are knowingly false, defames the Company, disparages the Company's products or services or depicts the employee engaging in conduct that is unlawful or in violation of CP Ward's workplace policies against workplace violence or discrimination and harassment on the basis of status any protected status under federal, state or local law.

Thus, the rules in CP Ward's Employee Handbook including but not limited to its Equal Employment Opportunity, Non-Harassment/Non-Discrimination, Non-Harassment, Sexual Harassment, Code of Ethics, Standards of Conduct, and Electronic Resources and Workplace Violence policies apply to employee behavior on social media and in public online spaces.

Employees may not post any information or conduct any online activity that violates applicable federal, state or local laws and regulations. Any conduct which is impermissible under the law if expressed in any other form or forum is also impermissible if expressed through social media. In addition, most social media websites/services have rules concerning the use of and activity conducted on their sites. These are sometimes referred to as “Terms of Use.” Employees must follow the established terms and conditions of use that have been established by the venue and not do anything that would violate those rules.

SAFEGUARD CONFIDENTIAL PERSONAL AND PROPRIETARY INFORMATION

Employees should exercise caution when posting their own or others' personal information. It is inappropriate to use or disclose “confidential personal information” (as defined below) about another individual or use or disclose CP Ward's “proprietary confidential information” in any form of social media.

For purposes of this policy, “confidential personal information” refers to information that could be used to commit identity theft, such as an individual's Social Security Number, financial account numbers, date of birth, driver's license number or personal medical information (including family medical history).

January 2025

CP Ward’s “proprietary confidential information” refers to internal information regarding CP Ward’s finances, future performance and operational plans, operational and brand strategies and information which is or relates to CP Ward’s trade secrets.

Confidential proprietary information does not include information lawfully acquired by non-management employees about wages, hours or other terms and conditions of employment, if used for purposes protected by Section 7 of the NLRA such as joining or forming a union, engaging in collective bargaining, or engaging in other concerted activity for their mutual aid or protection.

All CP Ward’s rules regarding CP Ward’s confidential proprietary information and confidential personal information, apply in full to social media, such as blogs or social networking sites.

IDENTIFY YOURSELF IN ENDORSEMENTS

Employees must clearly and conspicuously disclose their affiliation with CP Ward if they endorse, comment on or promote the Company's products or services in social media.

EXPECTATIONS OF PRIVACY

Consistent with CP Ward’s Electronic Use policy, CP Ward may access and monitor its Information Systems and obtain the communications within the systems, including email, Internet usage and the like, with or without notice to users of the system, in the ordinary course of business when the Company deems it appropriate to do so. When using such systems, employees should have no expectation of privacy regarding time, frequency, content, or other aspects of use, including the websites the employee visits and other Internet/Intranet activity. The reasons CP Ward accesses and monitors these systems include, but are not limited to maintaining the system, preventing or investigating allegations of system abuse or misuse, assuring compliance with software copyright laws, and complying with legal and regulatory requirements.

The Company will monitor social media to the fullest extent permitted by applicable law and will take disciplinary action against those who violate the policy.

PERSONAL USE OF SOCIAL MEDIA DURING WORKING HOURS

CP Ward respects the right of any employee to participate in social media, such as maintaining a blog or participating in online forums. However, to ensure proper employee focus is on job duties and adequate functioning of Company equipment, employees are not permitted to engage in social media activities during working time. For purposes of this policy, “working time” is defined as the time during which employees are performing work or are scheduled to work, but does not include scheduled rest periods, meal breaks and other specified times when employees are not expected to be working. Moreover, employees must avoid usage that may interfere with the system’s productivity, such as large attachments or audio/video segments.

IDENTIFY ANY COPYRIGHTED OR BORROWED MATERIAL WITH CITATIONS AND LINKS

When publishing any online material through social media, employees must respect and follow all copyright and other intellectual property laws and should use citations and links to original material, where possible. Employees are prohibited from using the Company's logos for any business/commercial venture without prior written approval.

ADDRESSING WORK-RELATED CONCERNS

For the most efficient resolutions employees are encouraged to address work-related concerns consistent with the Company's Open Communication policy through their manager, Human Resources or any other member of management with whom they feel comfortable rather than through social media.

NO RETALIATION

CP Ward will not take adverse action (e.g., discipline, transfer, termination) against any employee for reporting a possible violation of this policy or cooperating in any investigation with respect to a policy violation. Any employee who retaliates against another employee in violation of this policy will be subject to disciplinary action, up to and including termination.

DISCLAIMER

The Company will not enforce the social media policy in a manner that would interfere with employees' rights under the National Labor Relations Act to discuss the terms and conditions of employment.

ADDITIONAL INFORMATION

Contact Human Resources for additional information or clarification of any aspect of this policy.

6.16 TRAVEL TIME/BUSINESS EXPENSES

At times, CP Ward employees may be required to travel. CP Ward strives to maintain a fair and reasonable travel reimbursement policy in accordance with all federal, state and local regulations.

TRAVEL TIME

Ordinary Situation

All employees are to report to work at the office or scheduled job site. Employees are not compensated for travel time between the employee's home and the employee's office and/or job site. This is considered ordinary home to work and work to home travel. This is true whether an employee works at a fixed location or at different job sites. Normal travel between work and home is not worktime. CP Ward will make an exception when the job site is over 30 miles from home. Time will be paid for such travel after the 30-mile radius is exceeded. Only non-exempt (hourly) employees are eligible for travel time.

Home to Work in emergency situations

January 2025

Travel to the job and back home by an employee who receives an emergency call outside of regular, or scheduled hours, to report back to the regular place of business to do a job will be considered standard pay working time.

Home to work on special one-day assignment in another city

Travel time to another town or city for a one-day job assignment that does not involve an overnight stay will be considered work time and compensated to the extent that the travel time is longer than the employee's normal commuting time. In such situations, non-exempt employees will be compensated the difference between their normal commute and the commute for the one-day assignment.

Travel that is all in a day's work

Time spent by an employee in travel as part of his/her principal activity, such as travel from job site to job site during the workday, must be counted as hours worked. Where an employee is required to report at a meeting place to receive instructions or to perform other work there, or to pick up and to carry tools, the travel from the designated place to the work place is part of the day's work, and must be counted as hours worked.

Travel away from Home community

Travel that keeps an employee away from home overnight is travel away from home. Travel away from home is clearly worktime when it cuts across the employee's workday, including corresponding hours on non-working days. For example, if an employee regularly works from 9 a.m. to 5 p.m. Monday through Friday, any travel as a passenger during these hours is considered worktime and is compensable, including travel that takes place between those hours on Saturday and Sunday. Anything beyond normal work hours is not compensable.

MILEAGE/EXPENSE REIMBURSEMENT

Employees will be reimbursed for pre-authorized expenses, such as: Company-related travel mileage, hotel expenses, or other business expenses incurred on behalf of CP Ward. Employees will be reimbursed for their mileage at the current federal reimbursement rate. In addition to obtaining pre-approval, the employee must complete an expense reimbursement form, attach any receipts and submit to payroll.

Company gas cards are issued at the discretion of management. Complete instructions for their use will be given at the time of issuance. Employees are to comply with all rules and regulations including accurate reporting and tracking. Otherwise, the employee risks suspension of gas card privileges.

6.17 OPERATION OF VEHICLES FOR COMPANY BUSINESS

The use of Company vehicles is limited to authorized employees. It is the responsibility of every employee operating a Company vehicle or operating their own vehicle for Company business to drive safely and obey all traffic, vehicle safety and parking laws or regulations.

VALID DRIVER'S LICENSE

All employees authorized to drive Company or personal vehicles for use in conducting Company business must possess a current, valid driver's license and their driving record must meet the qualifications of our insurance carrier.

WORK-RELATED ACTIVITIES

Only those employees whose names appear on the Company list of authorized drivers and have a manager's permission can operate Company-owned or leased vehicles or equipment. Employees using Company vehicles are responsible for proper maintenance and must report any malfunctions or maintenance requirements to the fleet manager. Our Company vehicles must only be used in work-related activities and may not be used for personal business or activities without the approval of management. Company vehicles that are driven to and parked at employee residences must be secured when not occupied and have contents reasonably safeguarded. In accordance with New York State law, smoking is not allowed in Company-owned vehicles. Employees may not use portable electronic devices, including hand-held cellular telephones, while operating a Company vehicle.

PERSONAL VEHICLES

In some instances, employees may be required to drive their own personal vehicle for the purposes of conducting Company business. When this is the case the following criteria must be met:

- Satisfy the company driver qualification requirements
- Provide a certification of insurance with required limits of liability
- The vehicle must pass a documented safety inspection.

The Company is not responsible for any damages or fines incurred while conducting Company business in a personal vehicle. Employees may not use portable electronic devices, including hand-held cellular telephones, while operating a personal vehicle for Company business.

SAFETY WHILE DRIVING

No employee is permitted, under any circumstances to operate a Company vehicle or a personal vehicle for Company business when any physical or mental impairment affects the employee's ability to drive safely. Failure to demonstrate safe driving skills may result in loss of driving privileges and/or dismissal from employment. Employees, while driving on Company business, are expected to:

- Follow all driving laws and safety rules such as following posted speed limits and directional signs;
- Avoid confrontational or offensive behavior;
- Practice defensive driving;
- Wear seat belts, whether they are the driver or the passenger; and
- Take a sufficient number of driving breaks.

Employees while driving on Company business must refrain from distracting activities, including but not limited to:

January 2025

- Using a portable electronic device while driving to view, take or transmit images; to play games; or to compose, send, read, view, access, browse, transmit, save or retrieve e-mail, text messages or other electronic data; and
- Any other activity unrelated to the operation of the motor vehicle that jeopardizes an employee's safety or the safety of others while driving.

Portable electronic devices include cell phones, hand-held devices with mobile data access, laptop computers or other portable computing devices, electronic games and broadband personal communication devices. Drivers who hold portable electronic devices in a conspicuous manner while driving are presumed to be using such devices.

Employees who drive as part of their job duties are permitted to use hands-free cell phones while driving. Employees with hands-free devices for their cell phones are to make conversations brief. If road conditions are poor, traffic is heavy, the conversation is involved or other safety concerns are present, employees should find a proper parking space to continue their conversations.

Employees are permitted to use portable electronic devices to communicate during an emergency to emergency-response operators, hospitals, physician offices, health clinics, ambulance and other emergency vehicle drivers, firefighters and the police department.

Each employee is personally responsible for any fines incurred as a result of driving or parking violations (including tickets issue for cell phone use).

While on company time, all drivers, whether of company vehicles or personal vehicles used for company business, are subject to a company driver safety monitoring system that applies points to each driver's company record for violations of state vehicle and traffic laws. Points applied shall follow the NYS Department of Motor Vehicles point system. Drivers shall be assigned to one of the following risk pools, with listed consequences:

- 1 to 3 points – No action needed
- 4 to 5 points – Manager discusses driver's record and written warning issued
- 6 to 7 points – In addition to the above, driver training program required
- 8 to 9 points – In addition to the above, a GPS system will be installed in driver's vehicle
- 10 points or more – Driver no longer permitted to drive company vehicles or personal vehicles for company business, and may be subject to employee discipline up to and including termination.

Points will be cleared from a driver's company record on a rolling 18-month basis. Any conviction for driving while intoxicated or impaired shall immediately place the driver in the 10 points or more risk pool.

For additional information on vehicle use or driver qualifications, contact Human Resources.

6.18 USE OF COMPANY EQUIPMENT AND RESOURCES

When using Company vehicles or other property, employees are expected to exercise care, maintain the property in safe working order, and follow all operating instructions, safety standards and guidelines.

COMPANY EQUIPMENT

Employees should notify their manager if any equipment, machines, tools, or vehicles appear to be damaged, defective or in need of repair. Prompt reporting of damages, defects and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Employees who have questions about their responsibility for maintenance and care of equipment or vehicles used on the job should consult their manager.

All employees are expected to comply with all federal, state and local laws while operating Company vehicles and other equipment. The Company may discipline employees who engage in unlawful conduct.

COMPANY RESOURCES

The Company has significantly invested in telephone lines, laptops, computers, fax machines, photocopiers and other types of business equipment, internet access and software that are vital to keeping our operations flowing smoothly and effectively. The Company's resources are limited and, except as provided in the Voicemail, E-Mail & Computer Systems and Internet Usage policies, should be used for business transactions only and not for personal use, unless explicitly authorized by a manager.

COMPANY-PROVIDED CELL PHONES GUIDELINES

Certain officers and employees of CP Ward may be issued Company-provided cell phones in order to more effectively carry out their job responsibilities. Company-provided cell phones are issued primarily for purposes related to official business.

Management is authorized to establish such administrative regulations and procedures as may be necessary or desirable to carry out this policy. Such procedures shall include, without limitation, processes for monitoring Company-provided cell phone usage monthly in order to determine use history and whether issued phones continue to be needed and whether the cell phone plans previously purchased continue to provide value.

Due to the nature of our business, it is the policy of CP Ward that all Company-provided cell phones be answered promptly. If non-exempt employees answer calls outside of their normal working hours, this time must be recorded. Non-exempt employees will be compensated for time spent responding to call on company-provided cell phones in compliance with applicable federal and state wage and hour laws. In the event you cannot immediately answer your phone, voicemail should be checked, and calls returned as soon as safety permits.

Employees are to begin each conversation by clearly stating their name. Voicemail greetings must be professional. If you are on vacation or otherwise out of the office for an extended period of time, you should record an appropriate voicemail greeting indicating your return date and an alternate contact person. Employees are responsible for maintaining Company-provided cell phones in good working condition; any damage or loss is to be reported immediately to the employee's manager and whomever is responsible for administering CP Ward's Company-provided cell phones and/or IT. CP Ward retains the right to cancel cell phone service and recover Company-provided cell phones at any time.

USE OF COMPANY PROPERTY/VEHICLES

Company vehicles and property may not be removed from the premises or equipment operated for personal use without the written approval of a manager.

6.19 HOUSEKEEPING

Each employee is responsible for keeping their own work area, as well as common areas like the break room, neat and orderly. In addition, the Company may use a custodial service for the regular cleaning of our facility.

WORK AREAS

Subject to the Company's policies against discrimination, harassment and/or workplace violence, employees may personalize their work area as long as this does not result in clutter, disorder or other unreasonable interference with business operations. The Company reserves the right to exercise judgment as to whether an employee's personalization of their work area violates this policy.

RECEPTION AREA

Since all visitors pass through the reception area, it must present a professional impression of orderliness.

BREAK ROOM

The Company provides facilities for refrigeration and preparation of light meals. Please remember when using these facilities that others will use them as well. Each employee is responsible for cleaning up after themselves and using the proper trash receptacles for waste.

BEVERAGE BOTTLES

Beverage cans and bottles should be disposed of in recycling containers and not left to accumulate.

6.20 PARKING

Free parking facilities are available to the employees of CP Ward. When using these facilities, park in an orderly and courteous fashion.

January 2025

PROTECTION OF PROPERTY

For each employee's protection, car doors should always be locked when parking in our parking areas. The Company is not responsible for loss, damage or theft in our parking area.

SAFETY IN THE PARKING LOT

Employees must adhere to normal traffic laws while driving in our parking lot. This includes full adherence to stop signs and speed limits.

6.21 HATE SYMBOLS IN THE WORKPLACE

CP Ward is committed to creating a workplace free from harassment and discrimination, and we believe that a workplace free from hate symbols is essential for creating a productive and positive work environment.

DEFINITION OF HATE SYMBOLS

Hate symbols are defined as any symbols, words or phrases that are used to promote or express hatred, discrimination against or harassment of a particular group of people based on protected classes under federal, state or local law including but not limited to race, religion, ethnicity, national origin, sex, sexual orientation, gender identity, disability or veteran status.

DISPLAY OF HATE SYMBOLS

The display of hate symbols in the workplace are considered a violation of the Company's policies on Equal Employment Opportunity, Harassment & Discrimination Prevention and Standards of Conduct as they can create a hostile work environment for employees who are members of the groups being targeted. Hate symbols can also damage the Company's reputation and relationships with clients.

Employees are prohibited from displaying hate symbols in the workplace, including on their clothing, tattoos, or other personal items. This policy applies to all areas of the workplace, including offices, common areas, break rooms, visible areas of a virtual or remote workspace or the Company's parking lot.

EXAMPLES OF HATE SYMBOLS

The following are examples of symbols that have been historically associated with hate:

- Anti-Semitic symbols such as Swastikas;
- Neo-Nazi symbols;
- Numeric hate symbols;
- Certain flags such as the Confederate flag or Nazi Party flag;
- Ku Klux Klan symbols; or
- Any other hostile symbols, images or slogans that target someone's protected identity.

January 2025

This list is not exhaustive and there are many other symbols that can be considered hate symbols. If you are unsure whether or not a particular symbol is a hate symbol, please ask Human Resources.

TATTOOS

Employees with hate symbol tattoos are required to cover them up while at work. This can be done by wearing clothing that covers the tattoo, such as long sleeves or pants.

ENFORCEMENT

Employees who violate this policy may be subject to disciplinary action, up to and including termination of employment.

REPORTING VIOLATIONS

Employees who see someone violating this policy should report it to Human Resources immediately. Reports will be investigated promptly and confidentially to the greatest extent possible and consistent with the investigation process outlined in our Harassment & Discrimination Prevention policy.

NO DISCRIMINATION AND NO RETALIATION

The Company will not demote, terminate, discriminate, retaliate or otherwise take adverse action against an employee who makes a complaint or participates in an investigation related to this policy. Employees who feel that they have been discriminated against or retaliated against should report the matter to Human Resources.

6.22 SHOULD YOU LEAVE US

To ensure fairness and consistency throughout our Company, terminations are handled in accordance with the following provisions.

TYPES OF TERMINATIONS

Termination refers to either voluntary resignations initiated by the employee or involuntary terminations initiated by the Company.

RESIGNATIONS

Employees resigning voluntarily are expected to give a minimum of two (2) weeks' advance notice. Employees who are part of the management team are expected to give a minimum of four (4) weeks' advanced notice. Advance notice must be in writing and submitted to the employee's direct manager and to Human Resources so that the proper replacement can be found. An employee's consideration in this situation will be viewed favorably by management should the employee reapply for employment with the Company.

UNUSED BENEFIT TIME

Employees who resign voluntarily with the required advance notice will be paid for up to 56 hours of accrued but unused benefit time. Employees are required to provide a

January 2025

minimum of two weeks' notice except where otherwise dictated by position, as stated above. Payout will be issued in the employee's paycheck after separation.

Benefit time will be forfeited and will not be paid if the termination is involuntary or if the employee does not provide the required amount of notice

TERMINATION OF BENEFITS

Employees should see Human Resources for information regarding termination of benefits upon separation.

REQUESTS FOR REFERENCE CHECKS

So that the Company can handle requests for job references in a consistent, fair and lawful manner, all requests for official job references on behalf of the Company should be forwarded to Human Resources. In response to job reference requests, CP Ward will only confirm current or former employees' dates of employment and job title.

COMPANY PROPERTY

Upon termination, employees are expected to return all Company-issued items, including, but not limited to: keys, key fobs, tools, Employee Handbooks, manuals, computers, cell phones, flash drives and client information and may not retain any copies of Company information in any form.

EMPLOYEE RIGHTS UNDER THE FAMILY AND MEDICAL LEAVE ACT

THE UNITED STATES DEPARTMENT OF LABOR WAGE AND HOUR DIVISION

LEAVE ENTITLEMENTS



Eligible employees who work for a covered employer can take up to 12 weeks of unpaid, job-protected leave in a 12-month period for the following reasons:

- The birth of a child or placement of a child for adoption or foster care;
- To bond with a child (leave must be taken within 1 year of the child's birth or placement);
- To care for the employee's spouse, child, or parent who has a qualifying serious health condition;
- For the employee's own qualifying serious health condition that makes the employee unable to perform the employee's job;
- For qualifying exigencies related to the foreign deployment of a military member who is the employee's spouse, child, or parent.

An eligible employee who is a covered servicemember's spouse, child, parent, or next of kin may also take up to 26 weeks of FMLA leave in a single 12-month period to care for the servicemember with a serious injury or illness.

An employee does not need to use leave in one block. When it is medically necessary or otherwise permitted, employees may take leave intermittently or on a reduced schedule.

Employees may choose, or an employer may require, use of accrued paid leave while taking FMLA leave. If an employee substitutes accrued paid leave for FMLA leave, the employee must comply with the employer's normal paid leave policies.

While employees are on FMLA leave, employers must continue health insurance coverage as if the employees were not on leave.

Upon return from FMLA leave, most employees must be restored to the same job or one nearly identical to it with equivalent pay, benefits, and other employment terms and conditions.

An employer may not interfere with an individual's FMLA rights or retaliate against someone for using or trying to use FMLA leave, opposing any practice made unlawful by the FMLA, or being involved in any proceeding under or related to the FMLA.

BENEFITS & PROTECTIONS

ELIGIBILITY REQUIREMENTS

An employee who works for a covered employer must meet three criteria in order to be eligible for FMLA leave. The employee must:

- Have worked for the employer for at least 12 months;
- Have at least 1,250 hours of service in the 12 months before taking leave;* and
- Work at a location where the employer has at least 50 employees within 75 miles of the employee's worksite.

*Special "hours of service" requirements apply to airline flight crew employees.

REQUESTING LEAVE

Generally, employees must give 30-days' advance notice of the need for FMLA leave. If it is not possible to give 30-days' notice, an employee must notify the employer as soon as possible and, generally, follow the employer's usual procedures.

Employees do not have to share a medical diagnosis, but must provide enough information to the employer so it can determine if the leave qualifies for FMLA protection. Sufficient information could include informing an employer that the employee is or will be unable to perform his or her job functions, that a family member cannot perform daily activities, or that hospitalization or continuing medical treatment is necessary. Employees must inform the employer if the need for leave is for a reason for which FMLA leave was previously taken or certified.

Employers can require a certification or periodic recertification supporting the need for leave. If the employer determines that the certification is incomplete, it must provide a written notice indicating what additional information is required.

EMPLOYER RESPONSIBILITIES

Once an employer becomes aware that an employee's need for leave is for a reason that may qualify under the FMLA, the employer must notify the employee if he or she is eligible for FMLA leave and, if eligible, must also provide a notice of rights and responsibilities under the FMLA. If the employee is not eligible, the employer must provide a reason for ineligibility.

Employers must notify its employees if leave will be designated as FMLA leave, and if so, how much leave will be designated as FMLA leave.

ENFORCEMENT

Employees may file a complaint with the U.S. Department of Labor, Wage and Hour Division, or may bring a private lawsuit against an employer.

The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement that provides greater family or medical leave rights.

For additional information or to file a complaint:

1-866-4-USWAGE
(1-866-487-9243) TTY: 1-877-889-5627

www.dol.gov/whd

U.S. Department of Labor | Wage and Hour Division



WH1420 REV 04/16

January 2025

EMPLOYEE HANDBOOK RECEIPT ACKNOWLEDGEMENT

I acknowledge receipt of CP Ward's Employee Handbook which describes Company policies, an overview of current employee benefits and my obligations.

I understand that the policies contained in this are not intended to create a contract of employment nor is any other communication by a management representative, either express or implied, intended to be a contract, unless explicitly stated otherwise in a written agreement signed by the President of our Company.

I understand that this Handbook is not a guarantee of employment for any set period and that either the Company or I may terminate my employment at any time, with or without cause. Furthermore, I understand that the policies and benefits described in this Handbook may be added to, revised or deleted at any time.

I further understand that the benefit information found in this Handbook is intended to provide an overview of the benefit plans. The actual benefits may be controlled by the terms of the applicable plan documents and insurance policies. Questions regarding the interpretation of those plans will be answered in accordance with the actual plan documents and insurance policies, rather than the summaries contained in this Handbook. Employees may obtain copies of these documents from Human Resources.

I understand and acknowledge that nothing in this or in any other document or policy is intended to prohibit me from reporting concerns, making lawful disclosures or communicating with any governmental authority about conduct I believe violates any laws or regulations. I also understand and acknowledge that nothing about the policies and procedures set forth in this should be construed to interfere with any employee rights provided under federal, state or local law, including Section 7 of the National Labor Relations Act (NLRA), as more fully described in the Company's Statement of Rights Under the NLRA.

I have read, understand and agree to comply with the contents of this Handbook. It is understood that CP Ward retains the right to make decisions involving employment as needed in order to conduct its work in a manner that is beneficial to the employees and the Company.

If I have any questions about the information contained in this, I will discuss them with my manager and/or Human Resources.

Employee's Name (Printed)

Employee's Signature

Date

January 2025