

Table of Contents

Welcome!	6
Company Overview	7
Overview	7
Epitec's Hallmark	7
Feedback	7
Mission, Vision, and Values	7
MISSION	7
VISION	8
VALUES	8
Executive Management Team	9
Jerry Sheppard	9
Josie Sheppard	g
Tony Hollamon	9
Mark Ruma	9
Rebecca Bray	9
Code of Conduct	9
Appearance	9
Dress Code	9
Maintenance of Work Areas	g
Confidentiality Information and Nondisclosure	10
Retention	10
Listing of Personnel Names, Addresses, and Whereabouts	10
Personnel Files	10
Confidential Records	11
Conflict of Interest	12
Accepting or Giving Gifts	12
Accepting Other Employment	13
Employment Relationship	13
Termination	13
Equal Employment Opportunity	14
Falsification of Records	14
Harassment and Involvement	15
Sexual Harassment	15

Other Types of Harassment	16
Complaint Procedure and Violations	16
No Retaliation	17
Administration of this Policy	17
Conduct Not Prohibited by this Policy	17
General Standards of Conduct	17
Communication	18
Employee care team	18
Social Media	19
What you should never disclose:	20
Mobile and Electronic Devices	20
Email and Computer Policy	20
Driving Policy	21
Remote Work Policy	21
Grievance	22
Process Improvements	22
Whistleblower Policy	23
Policy Statement	23
Definitions	23
Whistleblower Protection	24
Procedures	25
Employee Health and Well-being	25
Employee Drug and Alcohol Abuse	25
Prohibited Conduct	25
Employer-Sponsored Events	26
Workplace Searches and Inspections	26
Testing	26
Administration of This Policy	27
Health Insurance	27
Health Insurance Portability and Accountability Act of 1996 (HIPAA)	28
Privacy Rules	28
Covered Entities	28
Health Insurance Continuation (COBRA) Coverage	28
Workplace Assident or Injury	20

Health, Safety and Environmental Statement	29
Workplace Violence Prevention	30
Prohibited Conduct	30
Epitec Prohibits Weapons at the Workplace	31
Complaint Procedure	31
No Retaliation	31
Administration of this Policy	32
Allergy Awareness	
Time and Expense	32
Attendance	32
Epitec defines its attendance policy in these terms:	32
Compensation Adjustment	32
Consultant Time System	33
Time Report Approval and Submittal Process	33
Billable Hours	33
Non-Billable Hours	34
Expenses	34
Employment Status	34
Full-Time and Part-Time Employment	34
Overtime Policy	34
Expense Reports	34
Holidays	35
Leave of Absence Policy	35
Unpaid Leave of Absence with Client Approval	35
Family Medical Leave Policy	36
Military Leave	39
Payday	42
Travel	42
Mileage	43
Paid time off	43
Miscellaneous	.4 4
401(K) Plan	44
Notary Public	44
Pafarral Award Program	11

Candidate Referral Bonus	44
The Rules	45
Total Quality Management Overview	45
TQM is based upon the following policies:	45
Contact Us	46
Acknowledgment	47
Handbook Acknowledgment	47
Congratulations!	47

Welcome!

Congratulations on your new role as a valuable member of the Epitec team.

We started Epitec with a single focus, "Placing People First." Knowing every good endeavor begins with listening and understanding, we've set about challenging every part of the employment process. Epitec represents the world's top companies and works to fill their open jobs with the world's best talent. We are proud to be representing you, and we promise to support you in your efforts to reach your professional goals.

Soon you will find that we have made careful arrangements to ensure your employee experience is an enjoyable one. In turn, we will rely on your innovative thinking and energetic spirit to provide solutions to our happy customers. As you learn your new role, you will also become acquainted with the supportive culture of our company. Epitec empowers you to impact the growth of the company by leveraging your talents to meet everyday customer demands and solve customer problems. Together we will embrace our differences and use forward-thinking to capitalize on our collective strengths.

Epitec is a premier IT, Engineering, and Professional Staffing company that offers opportunities to talented people who want to grow. We are a company that people want to work for, and companies want to do business with. We are a company that is employee focused, customer-driven, and processoriented. As a member of the Epitec team, you are one of our most valuable assets.

You will be working with other talented people who are currently moving some of our nation's greatest companies forward. These companies trust our industry expertise, award-winning processes, proprietary systems, and our employees.

We are pleased that you have chosen to grow your career with Epitec and to help lead the way to technology for our customers. We have taken great care to provide an environment where bright futures evolve for talented employees. We hope your employee experience results in a long and rewarding career with us!

Sincerely,

Josie Sheppard Head Coach & President

Company Overview

Overview

Epitec is a premier IT, engineering, and professional staffing company headquartered in Southfield, Michigan. Epitec was incorporated in March of 1978 in the State of Michigan to provide a higher level of IT, engineering, and related professional services. We offer the services of highly qualified professionals.

Epitec's mission is to be a valued resource to our customers, employees, and partners. To build a company that will last by being a healthy organization that continues to grow.

Epitec employs experienced professionals with multidisciplinary skills in many industries, including automotive, consumer products, finance, government, healthcare, insurance, manufacturing, oil and gas, retail, technology, transportation, and utilities.

Our quality employees and services generate a repeat business ratio of more than 90%. We take pride in securing long-term contracts, typically between 1 to 5 years. These factors provide greater stability, job security, and continued employee development.

Epitec's Hallmark

Our employees are our greatest asset. While other contract personnel firms talk about employee care, Epitec began with the premise that employee satisfaction determines the success of our company. We stand behind our staff in every way, to ensure their comfort and to help them present their best image. Epitec encourages employees to gain exposure to new environments and tools, thus strengthening their expertise. We take special care, providing our employees with positions that take full advantage of their talents and provide the challenges they need to grow professionally. Our marketing strategy provides greater stability for our workforce. This strategy allows Epitec to offer competitive pricing to meet customer demands. According to the Staffing Industry Analysts, Epitec ranks in the top 1% of all Staffing companies in North America and is a forerunner in the contract services industry. We believe the top 1% ranking is a result of our marketing strategy and competitive pricing.

Feedback

Epitec fosters a real-time employee relationship philosophy. This philosophy provides each employee with feedback regarding performance, pay increases, issues, and concerns on a real-time basis. This information is solicited from the client on an ongoing basis by our personnel and your employee care team. Information received from the client will be communicated to each employee. The objective of this real-time feedback philosophy is to let employees know whether their work performance meets their supervisor's expectations, to encourage improvement where necessary, and to recognize any achievements and accomplishments.

Mission, Vision, and Values MISSION

Our mission is to be a valued resource to our customers, employees, and partners. To build a company that will last by being a healthy and profitable organization that continues to grow.

VISION

Be a premier IT, engineering, and professional staffing organization that people want to work for, and companies want to do business with. Epitec is a company that is employee focused, customer-driven, and process-oriented.

VALUES

We have established six (6) core values that provide both internal and external advantages to Epitec. Our values guide our decision-making processes, educate clients and employees about Epitec, and clarify our identity. We invite our employees to embrace and leverage these values to accomplish our company vision.

WE CARE

- We recognize that both our customers and employees represent the infrastructure of our organization
- We care about our employees and their employee experience
- We care about the degree of pride our employees have in doing a good job
- We care about our reputation
- We care about our house
- We care about how we behave as an organization

WE EMBRACE

- We embrace the differences in one another and capitalize on our strengths to provide superior service
- We embrace change and encourage forward-thinking

WE ENGAGE

- We value proactive interaction, timely feedback, and meaningful communication with our customers, employees, and partners
- We collaborate effectively

WE EMPOWER

- We empower each person to contribute through formal and measurable processes using best-in-class tools and a high-performance workspace
- We have a clear definition of roles and responsibilities and look for ways to eliminate any
 confusion about who performs which tasks and where decision-making authority resides

WE INNOVATE

- We are committed to innovating purposefully
- We eliminate waste and minimize redundancy

WE IMPACT

- We impact the growth of the company by infusing training, leveraging process, and hiring the right resources that generate options to meet customer demands and solve customer problems
- We actively look for ways to improve performance
- We adapt and overcome

Executive Management Team

Jerry Sheppard

Chief Executive Officer

Josie Sheppard

President

Tony Hollamon

Executive Vice President

Mark Ruma

Chief Operating Officer

Rebecca Bray

Chief Sales Officer

Code of Conduct

Appearance

Epitec is proud of its professional image and strives to maintain the high standards of customer service for which we are known. Keep in mind that customers form images and opinions about Epitec based on their perception of our overall business presentation. Epitec feels that the appearance of our employees is one of the factors that contribute to a positive image and hopes that you will share in our pride.

Dress Code

The client serviced determines the dress code. Should you have a question about the appropriate dress, feel free to discuss it with your employee care team. Various clients may have different dress practices; avoid extreme fashions.

Each employee shall wear appropriate professional business attire, along with proper personal grooming, during regular working hours. All proper footwear must remain on the individual at all times.

It is up to your employee care team or client's discretion to decide if an employee's image, dress, or grooming is unprofessional.

Maintenance of Work Areas

Employees are responsible for maintaining their work areas in a neat and orderly fashion. To accomplish this, each employee should store and properly secure equipment and work items—including

information of value—before the end of the day each workday. Clothing, umbrellas, and other items should be stored in designated areas so that workstations are not unnecessarily cluttered. Epitec advises our employees not to carry or keep unnecessary amounts of cash or valuables with them when at work.

Confidentiality Information and Nondisclosure

Retention

Epitec is required by law to retain various data (both personal and confidential) on each employee. Therefore, Epitec has adopted the following principles:

- Epitec will request and keep only that information required for business or legal purposes.
- Epitec will protect the confidentiality of all personal information in its records and files as required by law.
- Epitec maintains the privacy of protected health information per HIPAA. Records about an employee's health, medical history, or claims for receipt of worker's compensation benefits are not kept in the employee's personnel file but are maintained separately.
- Epitec strictly limits the internal availability of personal information.
- Epitec will refuse, except in specific circumstances, to release information to outside sources without the expressed consent of the employee. Exclusions are limited to simple employment verification and legal requirements.

To keep your records updated on time, Epitec requires you to notify the employee care team of any changes in your address, phone, marital, or family status. You can inform us by raising a request on the employee portal at portal epitec.com.

Listing of Personnel Names, Addresses, and Whereabouts

This office does not route or make available to anyone, except the Corporate Staff, a listing of personnel names, addresses, phone numbers, and whereabouts. This policy protects each employee's "after hours" privacy, as well as client privacy.

Personnel Files

Personnel files are confidential and treated as such. Access to employee files is limited to the following:

The Employee

A reasonable number of times per year, each employee may inspect his or her personnel file, at a mutually convenient time and place. The employee must raise the request through the employee portal at portal epitec.com per state law. Except as specifically authorized by the CEO, President, COO, or Director of Finance of Epitec, you may not remove any materials.

Persons Other Than the Employee

Other employees of Epitec may have access to personnel files only if they need to know.

Limited Access

 Access is limited to Corporate staff, as he/she needs access in the course of their regular duties Others only as specifically authorized by the CEO, President, COO, or Director of Finance of Epitec

All Epitec records and information about Epitec, its employees, customers, suppliers, and vendors are to be kept confidential and divulged only to individuals within the company with both a need and authorization to receive the information.

Confidential Records

All Epitec records and information about Epitec, its employees, customers, suppliers, and vendors are to be kept confidential and divulged only to individuals within the company with a need and authorization to receive the information.

All records and files maintained by the company are confidential and remain the property of the company. No Epitec records, files, or Epitec-related information may be removed from Epitec's premises or disclosed to any outside party without the express permission from Epitec. Confidential information regarding Epitec includes, but is not limited to: financial records, business, marketing, and strategic plans, personnel records and payroll records regarding current and former employees, the identity of, contact information for, and any other account information on customers, vendors and suppliers, inventions, programs, trade secrets, formulas, techniques and processes, and any other documents or information regarding the company's operations, procedures or practices. Additionally, the contents of Epitec's records or information otherwise obtained regarding business may not be disclosed to anyone, except where required for a business purpose.

Employees must not disclose any confidential information to any unauthorized person inside or outside the company. Employees who are unsure about the confidential nature of specific information must ask their supervisor or employee care for clarification. The company reserves the right to avail itself of all legal or equitable remedies to prevent impermissible use of confidential information or to recover damages incurred as a result of the impermissible use of confidential information. Also, employees will be subject to appropriate disciplinary action, up to and including termination of employment for revealing information of a confidential nature. Employees may be required to enter into written confidentiality agreements confirming their understanding of the company's confidentiality policies.

The protection of confidential business information and trade secrets is vital to the interests and the success of Epitec.

Such confidential information includes, but is not limited to, the following examples:

- computer processes
- computer programs and codes
- customer lists
- customer preferences
- financial information
- hiring systems
- hiring processes
- labor relations strategies

- marketing strategies
- new materials research
- pending projects and proposals
- proprietary production processes
- research and development strategies
- scientific data
- scientific formulae
- scientific prototypes
- technological data
- technological prototypes
- training systems
- training processes

Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not benefit from the disclosed information.

Conflict of Interest

Accepting or Giving Gifts

No employee, or a member of that employee's immediate family, shall give or accept, directly or indirectly, any cash, gifts, special accommodations, favors, gratuities, or the use of any property or facility to or from anyone with whom the employee does business or is negotiating on behalf of Epitec.

This policy does not apply to gifts or entertainment provided to any customer or potential customer or its representative who meets all of the following criteria:

- It is sufficiently limited in value and is in a form other than cash that could not be construed, under the circumstances, as a bribe, payoff, or kickback.
- The gift or entertainment provided is consistent with all accepted ethical customs and practices.
- The gift or entertainment provided is not contrary to any applicable law or regulation.
- Epitec would not be embarrassed or injured if there were to be public disclosure of the gift or entertainment involved.
- Management approved the gift or entertainment.

Violation of this policy may result in immediate separation of employment or such other discipline or sanction, as Epitec may deem appropriate.

Accepting Other Employment

No employee may continue to work with Epitec, who accepts, directly or indirectly, any employment (part-time or temporary) with any customer, vendor, or competitor of Epitec while Epitec currently employs the employee or while the employee is on any authorized leave of absence.

Due to the effects on work performance and attendance, full-time employees of Epitec are discouraged from holding other positions outside Epitec. Epitec reserves the right to immediately terminate an employee when outside employment (full or part-time) interferes with their performance at Epitec.

Employment Relationship

The employment relationship between Epitec and its employees is a voluntary relationship, which will continue so long as it is mutually beneficial. Unless otherwise stated by state or local laws, Epitec employs on an "at-will" basis. Either party may terminate the employment relationship, with or without cause. The employee can end the relationship at any time, for any reason, with or without cause. Likewise, Epitec can terminate the relationship at any time, with or without cause.

No manager or other representative of Epitec other than its CEO, President, COO, or Director of Finance has the authority to enter into any agreement for employment for any specified period or to make any agreement contrary to the voluntary employment relationship described in this paragraph. Any such agreement, which is contrary to this voluntary relationship, must be in writing and signed by the CEO, President, COO, or Director of Finance and the employee.

Termination

The employee has the right to terminate their employment with Epitec at any time and for any reason. An employee voluntarily terminating employment must submit a letter of resignation to the employee care team at portal.epitec.com before termination. The letter of resignation will reference the anticipated last day of work. The employee will not discuss the details of their termination directly with the client at any time, allowing Epitec to inform the client of their resignation first. At no time will an employee attempt to negotiate with the client by sharing details of their compensation or other confidential information to persuade the client to increase their bill rate or to encourage the client to pressure Epitec to increase the employee's compensation without increasing the bill rate.

Unless otherwise stated by state or local laws, Epitec retains the right to terminate an employee with or without cause and with or without notice. Generally, such termination comes about due to performance falling below standards. Additionally, there may be business considerations supporting the decision to terminate; the lack of available work; conflicts of interest; statements contrary to Epitec's interests or derogatory to Epitec; poor attendance; actions or inactions which are contrary to Epitec's economic or ethical welfare; or other violations of Epitec policy and procedure. Generally, the last day worked is the official termination date. However, the termination date will be evaluated on a case-by-case basis in light of all of the facts and circumstances.

Your manager must approve all necessary time and expense entries on the last day of work.

 All Epitec and client property/documentation (briefcase, client badges, building pass, office key(s), desk key, cell phone, credit card, etc.) must be returned on or before your separation date, as they are property of Epitec or Client.

- Any salary advances or final offsets owed to Epitec by the terminating employee will be withheld from the compensation due to the employee, to the extent permitted by and according to applicable state law.
- If you are a participant of the 401(k) Retirement Savings Plan, there is a form that needs to be completed upon your separation from the company to enable you to receive your funds from this Plan.
- Federal law requires Epitec to offer "Continuation of Insurance Benefits" under the Consolidated Omnibus Reconciliation Budget Act (COBRA) to eligible employees. Epitec will notify eligible employees of this offer by mail within two weeks of your separation.
- All insurance benefits for participating eligible employees, such as health, dental, employerpaid life insurance, voluntary disability, voluntary life insurance, and vision, will cease
 according to the specific guidelines and terms of each insurance benefit plan. The
 termination provision of each such insurance plan shall govern that policy. For more details,
 refer to your insurance plan provider booklets or summary plan descriptions that contain
 provider policies and procedures.
- All other benefits for eligible employees, such as car and travel allowance, expense account
 privileges, commission, and bonus programs that are in effect at the time of termination,
 will cease the day employment terminates.
- All unpaid compensation before the date of termination will be paid to the employee. No other compensation will be due, including any commission or bonus, following the date of termination.
- Employee training cost will be due back to Epitec under the signed repayment agreement.

Equal Employment Opportunity

Epitec provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, genetic information, height, weight, gender expression, sexual orientation, marital status, or status as a Vietnam-era, special disabled veteran or other protected veteran, under applicable federal laws. Also, Epitec complies with applicable state and local laws governing nondiscrimination in employment in every location in which Epitec has facilities and employees. Epitec prohibits discrimination or harassment based on the perception that anyone has any of these characteristics or is associated with a person who has or is perceived as having any of these characteristics. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, benefits, compensation, and training.

Falsification of Records

Falsification of any information including, but not limited to, misstated qualifications, education, prior job experience, and any work-related disability that was given on an employment application or in any other instance during your employment is cause for immediate discharge. Falsification of time and expense related information such as overstated time and or expense transactions may be cause for immediate release.

Harassment and Involvement

Epitec strictly prohibits and does not tolerate unlawful harassment against employees or any other persons because of race, religion, creed, national origin, ancestry, sex (including pregnancy), gender (including gender expression, nonconformity, or status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, or local law. Epitec also prohibits harassment based on the perception that anyone has any of these characteristics or is associated with a person who has or is perceived as having any of these characteristics.

Sexual Harassment

All Epitec employees, other workers, and representatives (including vendors, clients, and visitors) are prohibited from harassing employees and other persons based on that individual's sex or gender (including pregnancy and status as a transgender or transsexual individual) and regardless of the harasser's sex or gender.

Sexual harassment means any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature when any of the following is true:

- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of the advance, request or conduct is used as a basis for employment decisions.
- Such advances, requests, or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile, or offensive work environment.

Epitec will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, unwelcome sexual advances or requests for sexual favors).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying sexually suggestive posters cartoons or drawings, sending inappropriate adult-themed gifts, leering or making sexual gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only and not exhaustive. Sexual harassment can come from superiors, fellow employees, or customers. Men, as well as women, can be victims of sexual harassment. Epitec cannot stress enough that it will not tolerate any form of workplace harassment. Although sexual harassment relates to conduct which is unwelcome, as we all know, what may appear to be welcome initially may be claimed later to have been unwanted, or it may have been submitted to because it was felt that a job or a promotion depended upon submissions. In addition, even welcomed sexual or romantic involvement between a supervisor and a subordinate impairs the supervisor's ability to evaluate that subordinate

fairly and raises questions of objectivity. Sexual or romantic involvement between subordinates also can raise questions about objectivity and generally interferes with the operation of the business. For these reasons, Epitec discourages sexual or romantic involvement between supervisors and their subordinates or between subordinates even when this conduct appears to be welcomed by both parties.

Harassment is prohibited both at the workplace and employer-sponsored events.

Other Types of Harassment

Epitec's anti-harassment policy applies equally to harassment based on an employee's race, religion, creed, national origin, ancestry, sex (including pregnancy), gender (including gender expression, nonconformity, or status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, or local law. Epitec also prohibits harassment based on the perception that anyone has any of these characteristics or is associated with a person who has or is perceived as having any of these characteristics.

Such harassment often takes a similar form to sexual harassment and includes harassment, that is:

- Verbal (for example, epithets, derogatory statements, slurs, derogatory comments, or jokes).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying derogatory posters, cartoons, drawings, or making derogatory gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only and not exhaustive. No form of harassment will be tolerated. Harassment is prohibited both at the workplace and employer-sponsored events.

Complaint Procedure and Violations

If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly follow the grievance procedure outlined in the handbook; or notify your supervisor or the employee care team. If you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be harassment, please immediately contact the employee care team at portal.epitec.com. Employee care will ensure that a prompt investigation is conducted.

Additionally, any manager or supervisor who observes harassing conduct must report the conduct through the grievance procedure or to the employee care team so that an investigation can be made and corrective action is taken, if appropriate.

Epitec will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment. To the extent possible, your confidentiality and that of any witness and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, you will be informed of the outcome of the investigation, to the extent possible. Persons found to violate this policy will be subject to disciplinary action, up to and including discharge.

No Retaliation

No one will be subject to, and Epitec prohibits any form of discipline, reprisal, intimidation, or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations.

Epitec is committed to enforcing this policy against all forms of harassment. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately through the Grievance Procedure outlined in the handbook. If employees do not report harassing conduct, Epitec may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

Administration of this Policy

The employee care team is responsible for the administration of this policy. If you have any questions regarding this policy or questions about harassment that are not addressed in this policy, please contact the employee care team.

Conduct Not Prohibited by this Policy

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities/activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits or terms and conditions of employment, forming, joining or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or legally required activities.

General Standards of Conduct

Epitec has developed standards of conduct to ensure quality service. To work together efficiently, effectively, and harmoniously, each employee is responsible for understanding and adhering to these standards. General standards of conduct exist to ensure orderly operation and provide the best possible work environment. Failure to abide by these rules may result in disciplinary action, up to and including termination.

Epitec's standards include the following:

- Always strive for professional excellence
- Understand and support Epitec's mission and overall direction
- Provide superior service to all customers and employees
- Be flexible, innovative, and responsive to change
- Manage human and financial resources wisely
- Be a team player; help others succeed
- Encourage open communication throughout the company
- Treat all individuals with dignity and respect
- Take pride in Epitec and your role in our collective success

Some examples of infractions that may result in disciplinary action, up to and including termination, are listed below.

This list is not all-inclusive, and other conduct not listed below may also result in disciplinary action, up to and including termination.

- Dishonesty, theft, or embezzlement
- Falsification of documents (e.g., employment applications, timesheets)
- Referring business to a direct competitor of Epitec
- Disclosing confidential information to a competitor
- Holding a second job which conflicts with the position at Epitec
- Unauthorized possession of company records
- Refusal to perform work as required, or any other act perceived as insubordination
- Excessive use of profanity
- Use or distribution of illegal substances
- Unauthorized consumption of alcohol on company premises or during working hours
- Conduct that may cause injury to persons or damage to property
- Sleeping on the job
- Harassment
- Sexual harassment
- Illegal discrimination
- Smoking in any company facility
- Unauthorized presence on company premises while off duty
- Misuse of company facilities, equipment, or other property
- Threats
- Fighting

Communication

Employee care team

If you have questions, contact our employee care team at portal epitec.com or (248) 864-7215.

The employee portal features a robust knowledge base that used to find immediate answers. Submit a request at portal.epitec.com for any question not answered in the knowledge base.

We intend to provide you with a 24/7/365 forum whereby you can contact the office regarding all

issues and concerns using the employee care team. As a single point of contact, the employee care team streamlines communication. It provides you with one avenue of contact via <u>portal.epitec.com</u> to engage the right resources with authority to address your issues or concerns in an accurate and timely manner.

Social Media

The use of social media can be valuable for creating and maintaining personal and business relationships. It can also present risks to not just your reputation, but the reputation of Epitec. This policy is not intended to restrict communications or actions protected or required by state or federal law. We have the following expectations for employee behavior in utilizing social media.

For purposes of this policy, social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's blog, journal or diary, personal web site, social networking web site, comment, chat room, whether or not associated or affiliated with Epitec, as well as any other form of electronic communication.

Importantly, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance; the reputation of yourself, your co-workers, Epitec, Epitec's suppliers, or Epitec's customers; the performance of fellow associates or otherwise adversely affects customers, suppliers, people who work on behalf of Epitec, or its legitimate business interests may result in disciplinary action up to and including termination.

These guidelines, as well as employee conduct, email and computer use, and non-harassment policies in this handbook, will govern your use of social media. Inappropriate postings that may include discriminatory remarks, harassment, bullying, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Always be fair and courteous to fellow associates, customers, suppliers, or people who work on behalf of Epitec. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by bringing your concerns to Human Resources than by posting complaints to a social media outlet. Nevertheless, if you post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, associates or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment based on race, sex, disability, religion or any other status protected by law or company policy.

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Epitec, co-workers, employees, customers, suppliers, people working on behalf of Epitec or competitors.

Maintain the confidentiality of Epitec's trade secrets and private or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how, and technology. Do not post internal reports, policies, procedures, or other internal business-related

confidential communications. Respect financial disclosure laws and understand that it is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities.

What you should never disclose:

- The numbers Non-public financial or operational information
- Personal information Never share personal information about our clients or employees
- Legal information Anything to do with a legal issue, legal case, or attorneys
- Anything that belongs to someone else This includes illegal music sharing, copyrighted publications, and all logos or other images that are trademarked by Epitec
- Confidential information Do not publish, post, or release information that is considered confidential
- Inappropriate information Do not disclose other employment (i.e., "moonlighting"), gambling activity, adult content, inappropriate slang or use of foul language, or disparaging remarks

Mobile and Electronic Devices

Employees must adhere to all federal, state, or local rules and regulations regarding the use of cell phones while driving. Employees should avoid making or receiving calls on a mobile phone or device while driving, even if hands-free. Therefore, they should ensure their mobile device can take messages or arrange for a passenger to use the mobile device while driving. **The use of text messaging while driving is forbidden.** Additionally, the use of any other electronic device while driving is also discouraged, for example, Android and IOS devices, laptops, tablets, iPads, Apple watches, or other similar devices and wearables.

Email and Computer Policy

The use of electronic communication (email) is a common way for employees to communicate throughout the normal course of business.

Employees should not expect privacy. Email is client property and, therefore, should be used for business-related purposes only. Business-related purposes include sending confidential information or company or client trade secrets. No messages should be created or sent, which may constitute harassment of any kind including, but not limited to, sexual harassment, hostile, intimidating, racial, or otherwise unlawful discrimination. Epitec or Client monitors email messages, including deleted emails. Misuse of email or any electronic systems may result in discharge.

Employees must keep company and or client issued equipment safe at all times. Employees must not leave equipment unattended, unlocked, or in an area subject to the possibility of theft.

Employees must keep passwords confidential. Employees are responsible for securing and locking their desktop, cell phones, and other devices when they are not in use. Accessing another user's device without prior consent and authorization may result in disciplinary action up to and including discharge.

Driving Policy

Driving is among the most hazardous tasks performed by Epitec employees. Therefore, it is the policy of Epitec that employee drivers are expected to follow defensive driving principles and all state laws and regulations. All Epitec employees must have a valid driver's license. While on company business, employees and their authorized passengers, if any, must wear seat belts. Other rules and regulations may apply, depending on client-specific policies.

Employees are responsible for any driving infractions or the payment of any fines, including parking fines incurred while on business. Employees are not permitted, under any circumstances, to operate a vehicle when physically or mentally impaired.

Remote Work Policy

From time to time, Epitec employees may work remotely, or they may have remote working assignments.

In either case, all employees of Epitec accept the following provisions regarding remote work with Epitec:

You will perform some or all of your work in a location other than an-Epitec or client location. The client and Epitec must provide approval for scheduled days and hours worked off-site. Epitec may legally modify or terminate this arrangement at any time for any reason. All general policies and procedures of Epitec will prevail. While working remotely, you are responsible for providing information required for Epitec's attendance and timekeeping processes.

You agree not to duplicate Epitec-owned or client-owned software except as formally authorized. You will take reasonable care to protect the equipment from theft, damage, or misuse. You must return all equipment and software when the remote work arrangement ends or when you leave Epitec. Epitec may take whatever legal action is necessary to regain its property, data, or supplies, and you authorize Epitec to recover any replacement costs related to this refusal through payroll deduction. If a balance remains after payroll deduction, then you agree to sign a promissory note for the balance.

You will take all precautions necessary to protect and hold secure proprietary information and will comply with client and Epitec policies regarding data security. You are responsible for following all client protocols for remote connection and VPN access. You will regularly use the client or Epitec-provided anti-virus software and will not install non-client, or non-Epitec provided or supported software on the client or Epitec-provided equipment. You agree to follow the client's or Epitec's standard policy regarding securing and disposing of confidential information. You will not use client or Epitec-provided equipment for personal use, and you will prevent unauthorized access to client or Epitec data by individuals who are not Epitec employees (spouse, children, visitors, etc.).

You will designate adequate and separate workspace in your home in a safe and hazard-free condition. Client or Epitec-provided equipment must be connected to a properly grounded electrical outlet, with all wires kept out of walkways. You understand that with at least 24 hours' advance notice, an authorized representative of Epitec may make annual on-site visits to your home office during regular business hours to monitor your compliance with Epitec's regulations including safety, security, and confidentiality regulations, or to inspect or retrieve data, client or Epitec equipment, or similar material.

You understand that it is your responsibility to assess tax implications related to your home office and that Epitec does not offer guidance on tax issues. If you have any questions regarding tax implications, you are encouraged to consult with a qualified professional.

Grievance

Epitec encourages an open and honest atmosphere in which problems or complaints are answered by Epitec management.

Should you feel that you have a work-related problem or concern regarding a policy, procedure, or staff member, you are encouraged to use the following grievance procedure:

- 1. Complete the Grievance form via DocuSign, which can be requested through the employee portal at portal.epitec.com.
- 2. If you are raising a concern covered by the Equal Employment Opportunity, Harassment, and Involvement, Whistleblower, or Workplace Violence Prevention Policies in this Handbook, please be sure to include as much detail as possible regarding your complaint, including:
 - a. Who, what, when, and where
 - b. What was said and what was done
 - c. Whether there were any witnesses to the conduct at issue, and if so, who
 - d. A method to contact you to confidentially discuss your concern
- 3. Quality Council reviews all grievances.

If the grievance is deemed urgent, a special meeting of the Quality Council is called. Further, the President will take into account any complaint of a sensitive nature and may resolve the grievance outside of the Quality Council.

- Action is determined and implemented.
- 2. The response is recorded on the Grievance Response/Action form by the appropriate manager.
- 3. The appropriate manager notifies the grievant of the actions taken and is given a copy of the completed form.
- 4. The Grievance Response/Action form is attached to the original Grievance form and filed in the employee's file.

Process Improvements

The Process Improvement ("PI") Procedure provides Epitec employees with a formal avenue to suggest and implement improvements. The PI Procedure follows designated steps, allowing for consistent and complete responses to every suggestion.

• The employee completes the PI form, which can be requested through the employee portal at portal.epitec.com.

- The employee submits the completed PI form through the employee portal at <u>portal.epitec.com</u>, who forwards it to the President, or the form may be sent directly to the President.
- The Quality Council reviews all PI suggestions at their next scheduled meeting.
- The Quality Council determines what action is to be taken.
- The employee care team or management notifies the employee of the outcome via the PI form.

Whistleblower Policy

Policy Statement

Epitec will investigate any possible fraudulent, dishonest, or illegal use or misuse of Epitec resources or property by employees. Epitec will likewise investigate any claim that it failed to maintain a safe and healthy work environment, as required under the federal Occupational Safety and Health Act of 1970 ("OSHA"), its enabling regulations, comparable state law, or other applicable health and safety law, rule, or regulation.

Anyone found to have engaged in fraudulent, dishonest, or illegal conduct or otherwise maintained an unsafe work environment is subject to disciplinary action by Epitec up to and including dismissal. Also, Epitec reserves the right to pursue civil/criminal prosecution. All employees of Epitec are encouraged to report possible fraudulent, dishonest, or illegal conduct (i.e., a whistleblower). An employee should report his or her concerns to a supervisor or manager, or the employee care team if the employee is uncomfortable reporting the violation to his or her supervisor or manager. The employee may also report it directly to the President via the grievance procedure found in this Handbook.

Definitions

Baseless Allegations

Allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to disciplinary action or legal claims by individuals accused of such conduct. Baseless Allegations do not include claims made in good faith or where the employee has reasonable cause to believe that there has been a violation.

Fraudulent, Dishonest, or Illegal Conduct

A deliberate act or failure to act to obtain an unauthorized benefit or other actions that violate a federal, state, or local law, rule, or regulation.

Examples of such conduct include, but are not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of files
- Fraudulent financial reporting
 - The pursuit of a benefit or advantage in violation of Epitec's Conflict of Interest Policy
 - Misappropriation or misuse of Epitec resources, such as funds, supplies, or other assets

- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked
- Committing environmental law violations
- Engaging in discriminatory acts in violation of relevant federal, state, or local laws

Whistleblower

An employee who informs a manager, supervisor, the employee care team, the President; or a government official and/or local law enforcement about an activity which that person believes to be fraudulent, dishonest, or illegal; or an employee who informs a manager, supervisor, the employee care team, the President, or to a government official and/or local law enforcement about an unsafe work environment in violation of a law, rule, or regulation.

Rights and Responsibilities

Reasonable care should be taken in dealing with suspected misconduct to avoid the following:

- Baseless allegations
- Premature notice to persons suspected of misconduct and or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under the law

Accordingly, anyone faced with suspected misconduct should adhere to the following:

- Should not contact the person suspected to further investigate the matter or demand restitution.
- Should not discuss the case with anyone other than the President, the employee care team, or a duly authorized law enforcement officer.
- Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
- Anyone who receives a report of a violation of the law, such as supervisors, managers, the
 employee care team, or the President, must promptly act to investigate and/or resolve the
 issue.

Whistleblower Protection

Definition of Whistleblower Protection:

- Epitec employees may not retaliate (including, for example, but not limited to, threats of
 physical harm, loss of a job, punitive work assignments, or impact on salary or wages)
 against a whistleblower for lodging a complaint, instituting a proceeding, or providing
 testimony in good faith regarding fraudulent, dishonest, or illegal conduct, or unsafe
 working conditions. Likewise, Epitec employees may not retaliate against employees who
 refuse to carry out directions or assignments that break the law.
- Epitec's restrictions on retaliation apply not only to supervisors of the employee but to all employees, including, for example, co-workers of the whistleblowing employee.

- Whistleblowers who believe that they have been retaliated against may file a grievance with
 the President or the employee care team. A proven grievance of retaliation shall result in a
 proper remedy for the person harmed and the initiation of disciplinary action, up to and
 including dismissal, against the retaliating person. This protection from retaliation is not
 intended to prohibit anyone from taking action in the usual scope of their duties and is
 based on valid performance-related factors.
- Epitec will use best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality; however, there is no such thing as an "unofficial" or "off the record" report. Epitec will keep the whistleblower's identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow Epitec or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of violations is entitled to the information as a matter of legal right in disciplinary or legal proceedings.
- Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Procedures

If you feel that you have been witness to a fraudulent, inappropriate, or criminal act; or subjected to an unsafe work environment, please follow the grievance procedure found in this Handbook. Nothing herein is intended to proscribe employees from reporting good faith claims of fraudulent, inappropriate, or criminal acts; or being subjected to an unsafe work environment, to the relevant legal authority, or participating in an investigation or providing testimony in connection with alleged acts of fraudulent, inappropriate, or criminal conduct.

Employee Health and Well-being

Employee Drug and Alcohol Abuse

Epitec recognizes that its subcontracted resources, employees, and customers have a legitimate interest in working in an environment that is free of illegal possession, use, or delivery of controlled substances and is committed to providing a safe, healthy, and productive work environment. Furthermore, such activity detracts from the image Epitec wishes to present to its customers. Finally, many of Epitec's customers are mandated by federal or state legislation or policy to provide a drug-free workplace. Epitec intends to comply with such legislation, policy, or desires of various individuals who work for, contract with, or seek the services of Epitec.

Consistent with this commitment, this policy establishes Epitec's intent to maintain a drug and alcohol-free workplace. Being under the influence of alcohol or illegal drugs (as classified under federal, state, or local laws) while on the job poses serious health and safety risks to employees, clients, and members of the public, which is not tolerated. This policy is intended to comply with applicable laws regarding drug and alcohol testing and employee privacy rights and will be enforced pursuant to applicable law.

Prohibited Conduct

Epitec expressly prohibits the following activities at any time that employees are either (1) on duty or conducting Epitec business (either on or away from Epitec's or an Epitec client's premises), or (2) on Epitec's or a client's premises (whether or not the employee is working):

- The use, abuse, or being under the influence of alcohol, illegal drugs, or other impairing substances.
- The possession, sale, purchase, transfer, or transit of any illegal or unauthorized drug, including prescription medication that is not prescribed to the employee or drug-related paraphernalia.
- The unlawful use or abuse of prescription drugs.

Nothing herein prohibits the appropriate use of over-the-counter medication or other medication that can legally be prescribed under both federal and state law, to the extent that it does not impair an employee's job performance or safety or the safety of others. Employees who take such medication to treat a disability should inform their supervisor or the employee care team if they believe the medication will impair their job performance, safety, or the safety of others or if they think they need a reasonable accommodation before reporting to work while under the influence of that medication.

A violation of any of the above is subject to disciplinary action, up to and including immediate termination. Also, Epitec reserves the right to refer the matter for criminal prosecution.

Employer-Sponsored Events

From time to time, Epitec may sponsor social or business-related events at which alcohol is served. This policy does not prohibit the use or consumption of alcohol at such events. However, if employees choose to consume alcohol at such events, they must do so responsibly and maintain their obligation to conduct themselves properly and professionally at all times and otherwise in accordance with the terms of this handbook.

Workplace Searches and Inspections

To achieve the goals of this policy and maintain a safe, healthy, and productive work environment, Epitec reserves the right at all times to inspect employees, as well as their surroundings and possessions, for substances or materials in violation of this policy. This right extends to the search or inspection of clothing, desks, lockers, bags, briefcases, containers, packages, boxes, tools and toolboxes, lunch boxes, and employer-owned or leased vehicles and any vehicles on the company property where prohibited items may be concealed. Employees should not expect privacy while on Epitec's or a client's premises.

Testing

In furtherance of the commitments set forth herein, job applicants and current employees may be requested or required to submit to drug and alcohol testing in certain situations.

Pre-employment: All job applicants are subject to drug testing. All offers of employment with Epitec are conditioned on the applicant submitting to and successfully completing and passing a drug test.

Reasonable Suspicion: Employees may be asked to submit to a drug and alcohol test if an employee's supervisor or other people in authority, such as a supervisor in charge of a client's worksite has a reasonable suspicion, based on objective factors such as the employee's appearance, speech, behavior, or other conduct and facts, that the employee possesses or is under the influence of unlawful drugs or alcohol, or both.

Testing Procedures: All drug and alcohol testing under this policy will be conducted by an independent testing facility, which will obtain the individual's written consent before the testing. Epitec will pay for

the full cost of the test. Employees will be compensated at their regular rate of pay for time spent submitting to a drug and alcohol test required by Epitec except for pre-employment drug and alcohol testing.

Confidentiality: All records relating to an employee or applicant's drug and alcohol test results will be kept confidential and maintained separately from the individual's personnel file.

Consequences: Employees who test positive will be subject to discipline, up to and including immediate termination of employment. Job applicants who test positive will have their conditional job offers withdrawn. Employees who refuse to submit to testing as required by Epitec or who fail to complete the test will be subject to discipline, up to and including immediate termination of employment. Job applicants who refuse to submit to drug and alcohol testing will be deemed to have withdrawn themselves from the application process and will no longer be considered for employment.

Administration of This Policy

Epitec expressly reserves the right to change, modify, or delete the provisions of this Substance Abuse in the Workplace Policy without notice.

The employee care team is responsible for the administration of this policy. If you have any questions regarding this policy or if you have questions about workplace substance abuse that are not addressed in this policy, please contact the employee care team.

Health Insurance

Epitec is pleased to offer Group Health Insurance and Dental Plans for its eligible full-time employees and their dependent(s). Coverage begins the first day of the month following sixty (60) days of employment. (For example, if an employee's start date is September 15, coverage becomes effective December 1.)

Epitec's health plan requires employees enrolled in the plan to contribute, as outlined in the Benefits Information Package. The employee contribution may be a pre-tax contribution as approved by the IRS regulation, Section 125 (medical, dental, and vision only).

We understand that you may be covered under another plan and do not desire this medical coverage. Employees who are covered under another health plan can elect to waive our medical coverage.

Epitec shall provide Life Insurance and AD&D for all eligible employees at no additional cost, according to the terms of the insurance provider's plan.

The entire cost of voluntary coverage is the responsibility of the employee via payroll deduction.

For detailed information regarding coverage of the above group health and voluntary plans, please refer to the benefit enrollment procedures or contact the employee care team.

This Handbook only describes the types of group insurance coverage and is not intended to amend or modify the actual terms of the insurance policies and plan. The terms of the insurance policy and plan are controlling regardless of any statement contained in the Handbook. Epitec reserves the right to alter, modify, or terminate this policy.

Health Insurance Portability and Accountability Act of 1996 (HIPAA)

This act requires that all health plans give individuals leaving the plan written certification of prior coverage called a "certificate of creditable coverage." The certificate ensures that individuals receive credit for previous coverage when moving to a new employer's health plan. This certificate of creditable coverage must be provided at the time of termination. Health plans receiving this certification from an individual employee enrolling in the plan must notify the individual of any preexisting condition period applying to their plan.

Under HIPAA, an individual employee will receive credit for continuous prior coverage toward satisfying the new plan's preexisting condition clause so long as the individual does not sustain a lapse in creditable coverage of more than 63 days. Partial credit is given in the event an individual was continuously covered, but for less than the applicable exclusionary periods.

Creditable coverage may include prior coverage under a group health plan, HMO, an individual health insurance policy, COBRA, Medicaid, or Medicare coverage. If you are unsure if you can demonstrate creditable coverage, contact us through the employee portal at portal.epitec.com.

Privacy Rules

Effective on and after April 14, 2003 (April 14, 2004, for small group health plans), the Plan is subject to the privacy rules of the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA"), and the Plan will only use protected health information (as defined by HIPAA Privacy Rules) for purposes related to health care treatment, payment for health care, and health care operations, and only in accordance with the uses and disclosures permitted by HIPAA, and as authorized or consented to by participants or beneficiaries pursuant to HIPAA.

Should you feel that your privacy rights have been violated, please follow the grievance procedure as outlined in this Handbook.

Covered Entities

Some Epitec employees may be assigned to work with specific Epitec clients that are medical insurance companies, healthcare providers, and other "Covered Entities," as defined by HIPAA. As a condition of employment by Epitec, such employees are expected to follow the HIPAA privacy policies and practices established by these clients. Failure to abide by these rules may result in disciplinary action up to and including termination and/or civil or criminal prosecution where appropriate.

Health Insurance Continuation (COBRA) Coverage

The Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1985 and subsequent amendments allow employees and their dependents to continue coverage through the company's health plans in certain circumstances called "qualifying events." Shortly after you are employed, you will receive a letter describing your rights under COBRA. Any questions concerning that notification should be directed to The employee care team.

In case of a divorce, legal separation, or dependent child losing eligibility, it is YOUR responsibility to notify Epitec through the employee portal at portal.epitec.com within 30 days after the event has occurred by filing a "Qualifying Event." Failure to provide this notice to Epitec will terminate the right to elect continuation coverage for any dependents on the plan.

Workplace Accident or Injury

As required by law, Epitec provides workers' compensation insurance protection for all employees. Workers' compensation insurance may provide you with wage and/or benefit protection on a limited basis for work connected to injuries or illness. It is the employee's responsibility to report all work-related injuries to his/her manager promptly. Failure to report immediately may delay or bar the receipt of benefits. All claims are subject to review and approval by the employee care team, the insurance carrier, independent physicians, and regulatory authorities.

Health, Safety and Environmental Statement

Epitec is committed to providing the best possible working conditions for all of its employees. To accomplish this, the company shall comply with all current occupational health, safety, and environmental laws and develop the best feasible operations, procedures, technologies, and policies to provide such conditions.

Company policy is aimed at preventing any employee, visitor, customer, or person residing or working near the company and or client facilities from being subject to any unusual health, safety, and environmental risk.

Epitec shall base its practices on the principle of least acceptable risk as defined and accepted by the public.

Epitec shall establish comprehensive and realistic policies based on experience and current scientific research to prevent unreasonable health, safety, and environmental risks.

To fulfill these goals, Epitec will:

- Maintain ongoing programs at all levels to identify employee health, safety, and environmental risks.
- The company shall see to it that all employees clearly understand all facets of company health, safety, and environmental programs that directly affect them and their duties.
- Make control and elimination of such risks a top priority in all company financial and business plans and budgets.
- The company shall provide the necessary funds to implement health, safety, and environmental programs.
- Control and reduce employee exposure to all known or clearly suspected occupational health and safety risks and attempt to lower the exposure levels as quickly as government regulation, technology, and economic feasibility allow.
- Provide incentive programs to encourage employees to identify, control, and eliminate occupational health, safety, and environmental risk.
- Establish and maintain programs to discuss company occupational health, safety, and environmental information with customers, stockholders, appropriate government bodies, and the general public.

- Voice company positions on occupational health, safety, and environmental concerns as they affect the company and its employees.
- Plan, design, and construct all new company facilities to provide the safest and the most healthful working environment possible.
- Recognize that despite every effort the company makes, the basic responsibility for employee health and safety rests with the individual. It is a condition of employment for all employees to conduct work in a safe, healthful, and environmentally conscience manner.

Workplace Violence Prevention

Epitec is committed to a safe work environment that is free of threats, intimidation, and physical harm. Everyone has a right to work in a safe environment, and everyone shares the responsibility for ensuring the safety of others. We have zero-tolerance for workplace violence, and we will investigate and take appropriate action up to and including dismissal and/or referral to local law enforcement and the relevant prosecuting authority regarding any threats to a safe workplace.

Epitec prohibits violent behavior in the workplace, including, but not limited to, physical assaults, fighting, threatening comments, intimidation, bullying, threats through electronic communications including social media, and the intentional or reckless destruction of property of the company, employee, Epitec representative, or customer. Comments or behavior that reasonably could be interpreted as intent to harm people or property will be considered a threat.

Epitec also prohibits the possession and/or use of weapons by any employee or Epitec representative while at work, on company property, or while on company business. Any employee or representative who believes that he or she may be the target of violence or threats of violence, or is aware of violent or threatening conduct by, or directed at an employee or Epitec representative that could result in injury to a person or the destruction of property, has a responsibility to immediately report the situation to his or her immediate supervisor or manager or notify the employee care team through the employee portal at portal epitec.com.

Epitec Prohibits and Will Not Tolerate Workplace Violence

Epitec prohibits and will not tolerate any form of workplace violence by an employee, supervisor, or third party, including vendors, clients, and visitors, both at the workplace and employer-sponsored events. For purposes of this policy, "workplace" includes not only Epitec's offices, outdoor areas, and parking lots, but also the office's, outdoor areas, and parking lots of Epitec's clients.

Prohibited Conduct

For purposes of this policy, workplace violence includes:

- Making threatening remarks (written or verbal).
- Aggressive or hostile acts such as shouting, using profanity, throwing objects at another person, fighting, or intentionally damaging a coworker's property.
- Bullying, intimidating, or harassing another person (for example, making obscene phone
 calls or using threatening body language or gestures, such as standing close to someone or
 shaking your fist at them).

- Behavior that causes another person emotional distress or creates a reasonable fear of injury, such as stalking.
- Assault.

This list is illustrative only and not exhaustive. No form of workplace violence will be tolerated.

Epitec Prohibits Weapons at the Workplace

Epitec prohibits all employees from possessing any weapons of any kind at the workplace, while engaged in activities for Epitec, and at Epitec-sponsored events. Weapons include:

- Guns.
- Knives.
- Mace.
- Explosives.
- Any item with the potential to inflict harm that has no common purpose.

This list is illustrative only and not exhaustive.

Complaint Procedure

If you witness or are subjected to any conduct you believe violates this policy, you must speak to, write, or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, notify the employee care team through the employee portal at portal.epitec.com as soon as possible.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses.

Epitec will directly and thoroughly investigate all complaints of workplace violence and will take prompt corrective action, including discipline up to and including termination, if appropriate. Epitec reserves the right to contact law enforcement, if necessary. To the extent permitted by law, Epitec reserves the right to seek a restraining order to prevent workplace violence against an employee or Epitec property.

If you become aware of an imminent violent act or threat of an imminent violent act, immediately contact appropriate law enforcement and then contact your direct supervisor or, if the conduct involves your direct supervisor, notify the employee care team through the employee portal at portal.epitec.com.

No Retaliation

Epitec prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of workplace violence of any kind, pursuing a workplace violence complaint, or cooperating in related investigations.

Epitec is committed to enforcing this policy against all forms of workplace violence. However, the effectiveness of our efforts depends largely on employees telling us about all incidents of workplace violence, including threats. Employees who witness any workplace violence must report it immediately. Also, if an employee feels that they or someone else may have been subjected to conduct that violates this policy, the employee must report it immediately. If employees do not report workplace violence

incidents, Epitec may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

Administration of this Policy

The employee care team is responsible for the administration of this policy. If you have any questions regarding this policy or if you have questions about workplace violence that are not addressed in this policy, please contact the employee care team.portal.epitec.com.

Allergy Awareness

Epitec provides a safe work environment for all employees. If you have an allergy or any other sensitivity, please contact Epitec's employee care team at <u>portal.epitec.com</u>. Epitec will promptly investigate your inquiry to determine whether a reasonable accommodation can be made.

Time and Expense

Attendance

Each employee is required to work the hours regularly scheduled for his or her position. When employees fail to take this seriously, time-consuming arrangements are often necessary to maintain the continuity of production. Each employee, therefore, is responsible for being present every day at the correct time.

Epitec defines its attendance policy in these terms:

Regular Working Hours

Employees working at client sites are required to observe the work hours designated by the client.

Tardiness

When an employee is not on the job at the designated start time, they are tardy.

Absence

For each day of absence, employees are required to notify the client and the employee care team through the employee portal at portal.epitec.com within the first half-hour of their designated arrival time that he/she will not be at work. It is the employee's responsibility to have the number(s) to call in case of absence. The employee care hotline is (248) 864-7215.

Compensation Adjustment

Compensation adjustments and/or the rate of pay are driven by the billing rate charged to the customer for a specific project. Therefore, future compensation and pay rates are also directly tied to the amount of the billing rate adjustment granted by the customer to Epitec. Hence, individual compensation has a direct relationship to what Epitec charges the customer.

Epitec recognizes the importance of compensation adjustments, as well as remaining competitive in the marketplace and responding to the customer's cost-control initiatives. To stay competitive within the industry and local area, Epitec will approach the customer for a billing rate adjustment as appropriate. The customer and Epitec both agree that tenure is not the sole basis for a billing/compensation

adjustment. Economics, feedback to and from the customer, customer perception, exceeding customer expectations, and health and fringe benefit costs are just a few items that are considered in the billing/compensation adjustment process.

The compensation adjustment process requires a team effort. The team consists of the Consultant assigned to the project, the employee care team, and the sales representative. All three team members must work together to provide the necessary feedback to the customer, which will support added value and our efforts to exceed customer expectations. A higher level of performance, physical presence, and continued feedback will drive the customer's perception.

Compensation adjustments, when applicable, are effective the effective date of the billing rate adjustment. All billing rate adjustments must be confirmed in writing from the customer before Epitec implementing a compensation adjustment. If Epitec does not receive a billing rate adjustment from the customer (for any reason), then a compensation adjustment may not be granted.

Consultant Time System

It is each Consultant's responsibility to obtain client approval of their time in the client system and to submit their time into the employee portal. Unless otherwise directed by the client, employees are to record their time worked in quarter-hour increments (.25, .50, and .75).

Payroll checks cannot be produced without client approved time. Therefore, it is paramount that the approved time is received each Monday before 5:00 p.m. The time you report downloads directly into the Payroll and Billing Systems. Hence, paychecks cannot be generated without the necessary input of your time.

Time Report Approval and Submittal Process

Consultants must submit time through the client system immediately upon completion of the assignment or at the end of each week, whichever is sooner. **Submit timesheets via the following process:**

- Employee completes time via <u>portal.epitec.com</u> and client time system error-free each Monday before noon.
- The employee submits timesheet through the client system for approval.
- Client supervisor verifies and approves the timesheet in the client system
- If the timekeeping email the employee receives in their first week states that a timesheet is required for submittal in portal.epitec.com, submit the approved timesheet through the portal each Monday by 5:00 PM.
- If needed, attach a client-approved timesheet in <u>portal.epitec.com</u>.
- Failure to report time may lead to a delay in pay or no pay at all.
- For any Non-billable hours, contact the employee care team at <u>portal.epitec.com</u> for the appropriate procedure.

Billable Hours

Billable hours are defined as hours for which the client will approve as hours worked. Billable hours do not include paid time off, holiday, lunch, etc. Record your time in quarter-hour increments (.25, .50, .75).

The time reporting instructions for individual assignments will be provided to you on your start date. If you have any additional questions, contact us through the employee portal at <u>portal.epitec.com</u>.

Non-Billable Hours

Non-billable hours are defined as Paid time off hours, holidays, and other voluntary unpaid hours.

Expenses

Submit client-approved, billable expenses with receipts, and the submitted, approved client expense through the employee portal at portal.epitec.com. Expenses must be submitted with receipts and client approval before eligible for reimbursement.

Employment Status

Full-Time and Part-Time Employment

Epitec recognizes that a Consultant may request a change to the regularly scheduled forty (40) hour workweek. If a Consultant requires a work schedule that consists of less than thirty (30) billable hours per week, the Consultant will be considered part-time. A part-time employee is not eligible for paid time off, paid holiday time, company contribution to medical benefits, or any other benefits that require full-time employment to participate. If any change is made to the schedule, it is the Consultant's responsibility to contact us through the employee portal at portal epitec.com.

Overtime Policy

Overtime requires approval in advance of working the overtime by the client Manager and Epitec. Submit the request for overtime approval through the employee portal at portal.epitec.com. Epitec shall pay for the applicable hours under the following guidelines:

- The client must be an hourly rate contract, not fixed priced.
- Overtime hours worked are the hours worked in excess of 40 hours for the payroll week or per the state's requirements.
- Overtime is paid in the regular paycheck.

Hours exceeding forty (40) hours per week are entered by an authorized member of the employee care team. Please inform the employee care team of your hours worked above forty (40) hours by raising a request at portal epitec.com

Expense Reports

Employees seeking expense reimbursement for business-related expenses will be paid when the client authorizes the expenses in the Client system and provides the necessary documents to bill the client. Expenses must be pre-approved by Epitec and the client. Receipts and client approvals are required in advance for all business expense reimbursements.

Expense reimbursements are processed through the employee portal and are paid following Epitec's regular payroll schedule.

Please contact your Finance team with questions through the employee portal at portal.epitec.com.

Holidays

Holidays are negotiated as part of your tailored compensation package. Of course, you can always decline holiday pay in favor of a higher pay rate, or you may select holiday pay for each holiday at the client that is recognized by Epitec. The maximum allowable holidays to be paid by Epitec are ten (10) holidays per calendar year. Employees working on assignments with customers that recognize more than ten (10) holidays will only be able to select the holidays that are listed in the employee portal. The list of Epitec recognized holidays might not equal the list of client recognized holidays. Furthermore, Epitec will not recognize holidays that are not recognized by the client. If a client recognizes less than ten (10) holidays, Epitec recognizes the client holidays only.

Should the client require that the employee work the client's official holiday, then the employee shall receive the regular holiday pay plus straight time pay for the actual hours worked on the day in question.

Holiday time must be entered in the appropriate payroll cycle to receive paid time. Retroactive holiday hours will not be allowed. Holidays that follow the last day of employment will not be paid. Employees must work at least one day after a holiday to be paid for the holiday. Employment status must be "active" for the employee to be eligible for holiday pay.

Leave of Absence Policy

Unpaid Leave of Absence with Client Approval

From time to time, the client, at its full discretion, may approve an extended period absent from work. This approval authorizes the employee to leave at an agreed-upon date ("leave start date") and return on an agreed-upon date ("leave return date"), after this referred to as unpaid leave of absence. An unpaid leave of absence may be granted for a variety of employee-requested reasons, is 100% voluntary, and must be requested by the employee only.

Eligibility

Full-time employees are eligible to apply for an unpaid leave of absence. Requests for leave may be denied or approved by the client and or Epitec for any reason or no reason.

Requesting an Unpaid Leave of Absence

Submit a request in writing through the employee portal at <u>portal.epitec.com</u> at least five (5) business days before the leave start date. This request should include the anticipated leave start date, the leave return date, and client approval email. Employees must enter their time into the required client or Epitec timekeeping systems in advance of the leave start date. If an employee should be unresponsive to inquiries from Epitec emails or phone calls for (72) seventy-two hours, the employee may be terminated with cause.

If an unpaid leave of absence is not requested according to this policy, a representative of Epitec will reach out to the client and attempt to obtain the approval. If the client's approval cannot be captured and or the employee is unresponsive to emails or phone calls for (72) seventy-two hours, the employee may be terminated with cause.

Employee Status

Employees maintain employee status during an approved unpaid leave of absence.

Paid Time Off and Holiday

An unpaid leave of absence may not start on a Holiday and may only begin after an employee has exhausted any available paid time off. Holiday pay is forfeited during the unpaid leave of absence.

Benefits

An unpaid leave of absence causes a reduction of hours, which triggers a qualifying event. An employee may elect to maintain benefits while on an unpaid leave of absence, or they may choose to let their benefits terminate the end of the month following the last day worked.

All benefits such as health, dental, vision, and employee-paid insurances are to be paid by the employee in full, without company contribution, and in advance of the leave start date. If full payment for the appropriate premiums is not received, then the applicable insurance policies may terminate the end of the month following the last date worked, and any rights to COBRA and/or conversion and portability will apply. The employee will have the option to re-enroll following their leave return date subject to enrollment rules and regulation. Outstanding payroll advances and or repayment agreements must be paid in full and in advance of the leave start date.

Scheduled Return to Work

If you are unable to return to work by the approved leave return date, you must submit a request for approval with a new return date, in writing, and five business days before the originally scheduled return date. Should the client or Epitec deny the leave extension, you must return to work on the originally scheduled return date. If you do not return to work on the approved leave return date, then the termination date will be the earlier date of when Epitec was notified that you would not be returning as initially scheduled or the date the unpaid leave of absence ends.

Family Medical Leave Policy

Epitec provides leave according to the Family and Medical Leave Act of 1993 (FMLA), which provides for unpaid, job-protected leave to covered employees in certain circumstances.

Eligibility

To qualify for FMLA leave, you must: (1) have worked for Epitec for at least 12 months, although it need not be consecutive; (2) worked at least 1,250 hours in the last 12 months; and (3) be employed at a worksite that has 50 or more employees within 75 miles. If you have any questions about your eligibility for FMLA leave, please contact the employee care team.

Please contact employee care at portal epitec.com if you have any questions or concerns regarding FMLA eligibility.

Leave Policy

If eligible, you may take up to 12 or 26 weeks of family or medical leave, whichever is applicable (as explained below), within the relevant 12-month period defined below. While you are on FMLA leave, Epitec will maintain your group health insurance coverage at the same level and under the same circumstances as when you were actively working, as explained more fully under the section titled, "Medical and Other Benefits." On returning from approved FMLA leave, you have the right to be restored to the same job or an equivalent position, subject to the terms, limitations, and exceptions provided by law.

Leave Entitlement

You may take **up to 12 weeks** of unpaid FMLA leave in a 12-month period, which uses a "rolling" method that is measured backward from the date you use any FMLA leave for any of the following reasons:

- the birth of a son or daughter and in order to care for that son or daughter (leave to be completed within one year of the child's birth);
- the placement of a son or daughter with you for adoption or foster care and in order to care for the newly placed son or daughter (leave to be completed within one year of the child's placement);
- to care for a spouse, son, daughter, or parent with a serious health condition;
- to care for your own serious health condition, which renders you unable to perform any of the essential functions of your position; or
- a qualifying exigency of a spouse, son, daughter, or parent who is a military member on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty.)

You may take **up to 26 weeks** of unpaid FMLA leave in a single 12-month period, beginning on the first day that you take FMLA leave to care for a spouse, son, daughter, or next of kin who is a covered service member and who has a serious injury or illness related to active duty service, as defined by the FMLA's regulations (known as military caregiver leave.)

Both Spouses Employed by Epitec

Spouses who are both employed by Epitec and eligible for FMLA leave may be limited to a:

Combined total of 12 weeks of leave during the 12-month period if leave is requested:

- for the birth of a son or daughter and in order to care for that son or daughter;
- for the placement of a son or daughter with the employee for adoption or foster care and in order to care for the newly placed son or daughter; or
- to care for an employee's parent with a serious health condition.

Combined total of 26 weeks in a single 12-month period if the leave is either for:

- military caregiver leave; or
- a combination of military caregiver leave and leave for other FMLA-qualifying reasons.

Notice of Leave

If your need for FMLA leave is foreseeable, you must give Epitec at least 30 days' prior written notice. If this is not possible, you must at least give notice as soon as practicable (within one to two business days of learning of your need for leave). Failure to provide this notice may be grounds for delaying FMLA-protected leave, depending on the particular facts and circumstances.

Additionally, if you are planning a medical treatment or a series of treatments or you are taking military caregiver leave, you must consult with Epitec first regarding the dates of this treatment to work out a schedule that best suits the needs of the employee or the covered military member, if applicable, and Epitec.

Where the need for leave is not foreseeable, you are expected to notify Epitec within one to two business days of learning of your need for leave, except in extraordinary circumstances. Epitec has Family and Medical Leave Act request forms available from the employee care team. Please submit a written request to at portal epitec.com when requesting leave.

Certification of Need for Leave

If you are requesting leave because of your own or a covered relative's serious health condition, you and the relevant health care provider must supply appropriate medical certification. You may obtain Medical Certification forms from the employee care team. When you request leave, Epitec will notify you of the requirement for medical certification and when it is due (at least 15 days after you request leave). If you provide at least 30 days' notice of medical leave, you should also provide the medical certification before leave begins. Failure to provide requested medical certification in a timely manner may result in denial of FMLA-covered leave until it is provided.

Epitec, at its expense, may require an examination by a second health care provider designated by Epitec. If the second health care provider's opinion conflicts with the original medical certification, Epitec, at its expense, may require a third, mutually agreeable, health care provider to conduct an examination and provide a final and binding opinion. Epitec may require subsequent medical recertification. Failure to provide requested certification within 15 days, when practicable, may result in delay of further leave until it is provided.

Epitec also reserves the right to require certification from a covered military member's health care provider if you are requesting military caregiver leave and certification in connection with military exigency leave.

Reporting While on Leave

If you take leave because of your own serious health condition or to care for a covered relative, you must contact Employer every thirty days regarding the status of the condition and your intention to return to work. In addition, you must give notice as soon as practicable (within two business days if feasible) if the dates of leave change or are extended or initially were unknown.

Leave is Unpaid

FMLA leave is unpaid. You will be required to substitute any accrued and unused paid time off for unpaid FMLA leave as described below:

- If you request leave because of a birth, adoption, or foster care placement of a child, any accrued and unused paid leave will first be substituted for unpaid family/medical leave and run concurrently with your FMLA leave.
- If you request leave because of your own serious health condition, or to care for a covered relative with a serious health condition, any accrued paid time off will be substituted for any unpaid family/medical leave and run concurrently with your FMLA leave.

The substitution of paid leave time for unpaid FMLA leave time does not extend the 12 or 26 weeks (whichever is applicable) of the FMLA leave period. In no case can the substitution of paid leave time for unpaid leave time result in your receipt of more than 100% of your salary. Your FMLA leave runs concurrently with other types of leave, for example, accrued vacation time that is substituted for unpaid FMLA leave and any state family leave laws, to the extent allowed by state law.

Medical and Other Benefits

During approved FMLA leave, Epitec will maintain your health benefits as if you continued to be actively employed. If paid leave is substituted for unpaid FMLA leave, Epitec will deduct your portion of the health plan premium as a regular payroll deduction. If your leave is unpaid, you must make arrangements with the employee care team to pay your portion of the premium. Your health care coverage will cease if your premium payment is more than 30 days late. If your payment is more than 15 days late, we will send you a letter to this effect. If we do not receive your premium payment within 15 days after the date of this letter, your coverage may cease. If you elect not to return to work for at least 30 calendar days at the end of the leave period, you will be required to reimburse Epitec for the cost of the health benefit premiums paid by Epitec for maintaining coverage during your unpaid leave, unless you cannot return to work because of a serious health condition or other circumstances beyond your control.

Intermittent and Reduced Leave Schedule

If medically necessary, FMLA leave occasioned by a serious health condition may be taken intermittently (in separate blocks of time due to a serious health condition) or on a reduced leave schedule (reducing the usual number of hours you work per workweek or workday). FMLA leave may also be taken intermittently or on a reduced leave schedule for a qualifying exigency relating to covered military service.

If leave is unpaid, Epitec will reduce your salary based on the amount of time actually worked. In addition, while you are on an intermittent or reduced leave schedule, Epitec may temporarily transfer you to an available alternative position that better accommodates your leave schedule and has equivalent pay and benefits.

Returning from Leave

If you take leave because of your own serious health condition (except if you are taking intermittent leave), you are required, as are all employees returning from other types of medical leave, to provide medical certification that you are fit to resume work. Otherwise, you will not be permitted to resume work until it is provided.

State or Local Family and Medical Leave Laws and Other Company Policies

Where state or local family and medical leave laws offer more protections or benefits to employees, the protections or benefits that are more favorable to the employee, as provided by these laws, will apply.

Military Leave

Epitec recognizes that employees may need to be absent from work to serve in the US military. Epitec provides military service leaves of absence to all regular full-time, part-time, and probationary employees in compliance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and applicable state laws.

Administration of this Policy

The employee care team is responsible for the administration of this policy. If you have any questions regarding this policy or if you have questions about military service leave that are not addressed in this policy, please contact the employee care team by raising a request on the employee portal at portal.epitec.com.

Procedures

If you need to take military service leave, you or an authorized military service officer should provide advance notice to the employee care team. When possible, you should give at least 30 days' notice of your request for leave. If 30 days' notice is not possible because of military necessity or for other reasons, you should give as much advance notice to Epitec as possible.

Written notice is preferred, but not required. Where possible, please submit a copy of your military orders, training notice, or order to active duty, along with a Request for Leave of Absence form which will be provided to you upon notification and must be returned to the employee care team.

ELIGIBILITY REQUIREMENTS

Eligible Employees. All regular full-time, part-time, and probationary employees are eligible for military service leave if they are absent from work because of eligible military service. Independent contractors and employees who were only employed for a brief, non-recurrent (one-time only) period before the start of military service are not eligible for leave under this policy.

Eligible Military Service. For purposes of this policy, eligible military service means certain types of service (listed below) in the following branches of the US military:

- Armed Forces (Army, Navy, Air Force, Marine Corps, and Coast Guard), including the Reserves.
- National Guard, including the Army National Guard and Air National Guard, when the employee is engaged under federal authority in active duty for training, inactive duty training, or full-time National Guard duty.
- Commissioned corps of the Public Health Service.
- Any other category of persons designated by the President in time of war or national emergency.

Eligible employees may take leave under this policy for the following types of military service:

- Active duty.
- Active duty for training.
- Initial active duty for training.
- Inactive duty training.
- Full-time National Guard duty.
- Submitting to an examination to determine your fitness for any of these services.
- Funeral honors duty performed by National Guard or Reserve members.
- Duty performed by intermittent disaster response personnel for the Public Health Service and approved training to prepare for this service.
- Service as an intermittent disaster response appointee of the National Disaster Medical System when employees are:
- activated under federal authority; or
- attending authorized training in support of a federal mission.

COMPENSATION DURING LEAVE

Military service leave is unpaid. However, employees may use any or all of their accrued but unused vacation or other paid time off during their military service leave.

BENEFITS DURING LEAVE

During military service leave, all benefits provided under an employee benefit plan are governed by the terms and conditions of the applicable employee benefit plan documents in accordance with applicable law. For all other non-seniority benefits, an employee on military service leave will receive the same rights and benefits as employees on an unpaid leave of absence.

REEMPLOYMENT

Employees may be eligible for reemployment after their military service leave. Any employees who would like to return to work must report to work or submit an application for reemployment to the the employee care team, including their military discharge documentation, if available, as follows:

- If their military service was for less than 31 days, they must report to work on the first regularly scheduled workday that is at least eight hours after they return home from military service.
- If their military service was for 31 to 180 days, they must apply for reemployment within 14 days following completion of military service.
- If their military service was for more than 180 days, they must apply for reemployment within 90 days following completion of military service.
- If they suffered a service-connected injury or illness and they are hospitalized or convalescing, they have up to two years following completion of military service to return to their jobs or apply for reemployment, depending on the length of recovery time required.
- If any employees are unable to comply with this reporting schedule through no fault of their
 own or if they are injured or recovering from an injury and need an accommodation for
 specific circumstances beyond their control, they should speak with the employee care team
 as soon as possible to determine if they are eligible for a reasonable accommodation or
 additional time to apply for reemployment. Employees who do not report to work or apply
 for reemployment within the applicable timeframe will be subject to Epitec's rules about
 unexcused absences.

Nothing in this policy requires Epitec to reemploy individuals who are not eligible for reemployment rights under applicable law.

SENIORITY RIGHTS AFTER REEMPLOYMENT

Employees who are eligible for reemployment will be reemployed with the same seniority, and all rights and benefits based on that seniority, that they would have attained if they had not taken military leave. Seniority rights include pay and benefits that accrue or are determined based on their length of service.

DISCRIMINATION AND RETALIATION PROHIBITED

Epitec prohibits and will not tolerate discrimination or retaliation against any employee or applicant because of that person's membership in or obligation to perform service for any branch of the US military. Specifically, no one will be denied employment, reemployment, promotion, or any other benefit of employment, or be subjected to any adverse employment action based on that person's membership in or service for any branch of the US military. In addition, no one will be disciplined,

intimidated, or otherwise retaliated against because that person exercised rights under this policy or applicable law.

Epitec is committed to enforcing this policy against discrimination and retaliation. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately. If employees do not report such conduct, Epitec may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

STATE OR LOCAL MILITARY SERVICE LEAVE LAWS

Where state or local military service leave laws offer more protections or benefits to employees, the protections or benefits that are most favorable to the employee, as provided by such laws, will apply.

Payday

Employees report time every week and are paid weekly. Payday is every Friday; refer to the Payroll Reporting Schedule for specific dates.

Payroll checks are produced from the employee portal and/or client-approved time reports. Payroll checks cannot be provided without the approved time report. Therefore, it is paramount that time is entered into the employee portal or client time reporting system each Monday before noon.

Should the Finance team not receive the employee's client approved time report as outlined in the Time Report Section of this manual, the employee shall not receive his/her payroll check until the next scheduled payroll cycle.

Should the Finance team not receive the employee's signed time report as outlined in the Time Report Section of this manual, the employee shall not receive his/her payroll check until the next computerized payroll cycle.

By law, Epitec is required to make deductions from your compensation for Federal, State, City, Medicare, and Social Security Taxes and deposit the funds with the proper agency. Epitec is required by law to contribute to the social security fund and Federal and State unemployment funds on behalf of each employee.

Travel

Company Business Travel Allowances

Any employee of Epitec traveling on company business, whether in town or out of town, is required to have a current and valid driver's license and appropriate auto insurance coverage. Employees without a valid driver's license may be put on indefinite layoff status, without pay.

Before traveling out of town on company business, arrangements must be made for airline tickets, lodging, car rental, etc. These details should be submitted to your employee care team at portal.epitec.com in advance of all travel. If an employee is required to take client-mandated travel, Epitec will make the necessary travel arrangements for the corresponding employee only.

Epitec cannot make additional arrangements to extend the business trip for personal reasons or make further arrangements for joining family or friends.

You must receive approval from both Epitec and the client before making any travel reservations or arrangements for any expenses to be eligible for reimbursement.

All expenses should be submitted through the employee portal at <u>portal.epitec.com</u> and appropriate client system(s) following Epitec and client travel expense policies and within one week after returning from a trip.

Mileage

Business auto mileage is defined and limited to the miles traveled by the employee as required in the performance of their assignment. The commute to and from the office location is not reimbursable.

Mileage allowance will be paid ONLY when the client authorizes the travel expense and provides Epitec with the necessary documentation to bill the client for the travel.

The mileage you travel, per the client's request, will be reimbursed to you at the customer's standard mileage allowance. You are required to log your expenses in <u>portal.epitec.com</u>, detailing your business-related travel mileage, the customer's standard rate allowance per mile, and the total to be reimbursed by the customer. The expense report must be approved by the client in order to receive reimbursement.

Paid time off

Paid time off ("PTO") is an accrued benefit, and is negotiated as part of your tailored compensation package. Of course, you can always decline paid time off in favor of a higher pay rate. If paid time off is important to you, we allow you to select up to 3 weeks of PTO depending on the project duration and client expectations.

The annual PTO accrual amounts available are listed below:

1 week PTO Accrue PTO at is .0192 per payroll hour
 2 weeks' PTO Accrue PTO at is .0384 per payroll hour
 3 weeks' PTO Accrue PTO at is .0576 per payroll hour

The maximum rate a Consultant can accrue paid time off at is .0576 per hour, which is three weeks of paid time off per year.

Epitec's Consultants shall accrue paid time off based on regular hours worked, paid holiday hours, and PTO hours reported each pay period. The hourly PTO accrual rate shall be based on the PTO amount negotiated at their date of hire.

The PTO accrual is based on the number of hours you are paid each cycle, up to your maximum accrual for a year. Working overtime allows you to accrue your hours faster; however, once you have reached your maximum accrual for the year, you will stop accruing PTO until the following year begins. The maximum PTO balance allowable to be carried forward from fiscal year to fiscal year is equal to the largest number of hours that you are accruing in a payroll year.

If an employee is out of the office for any reason, any available PTO hours must be used before taking unpaid time off.

For Example

If an employee elects to accrue eighty (80) hours of PTO annually, then the maximum amount of hours that could roll over to the new fiscal year would be eighty (80) hours of PTO. All PTO hours over eighty (80) would be forfeited.

PTO is a benefit to use to be paid when taking time off and cannot be arbitrarily paid out.

PTO accruals will be visible in the employee portal; however, employees are not eligible to use PTO in the first ninety (90) days of employment.

If your employment with Epitec is terminated for any reason before ninety (90) days of employment, your PTO balance is not available for use and will not be paid out.

If your employment with Epitec is terminated for any reason after the first ninety (90) days of employment, your positive accrued PTO will be paid out in the pay cycle following your paycheck for final hours paid, except as otherwise required by applicable law.

Miscellaneous

401(K) Plan

Epitec has a voluntary 401(k) Retirement Savings Plan in which all eligible employees may participate. Eligibility and participation will be effective on the first day of the month following the initial hire date. For example, if an employee's start date is September 15, participation begins October 1 or the first payroll cycle in the eligible month.

This plan was instituted to provide each participant with a means of reducing their current withholding taxes (Federal, State, and City) to invest in their retirement with pre-tax dollars. Each participant may contribute a percentage of his or her gross annual salary voluntarily but not to exceed the maximum yearly contribution as determined annually by the Internal Revenue Service (IRS). Epitec is pleased to provide a company match in addition to your 401(k) contribution. Epitec will match 25% of the first 6% of your gross wages. For more detailed information regarding the 401(k) plan and the various funds, contact us through the employee portal at <u>portal.epitec.com</u>. Epitec reserves the right to modify or terminate the 401(k) plan, at its sole discretion, to the extent permitted by law.

Notary Public

For your convenience, there is a certified notary public in the Corporate Office. Raise a request through the employee portal at <u>portal.epitec.com</u> and let us know what documents you may need notarized.

Referral Award Program

Candidate Referral Bonus

Epitec has a candidate referral award program. Each time a Consultant makes a referral to Epitec, and Epitec hires the individual; an award will be paid to the referring Consultant as follows:

Referral Bonus of \$1,000 for each eligible referral.

Should you know a qualified candidate, you would like to introduce to Epitec, obtain that individual's resume, include your name with the resume, and submit through the employee portal at portal.epitec.com. The referrer should inform the prospective candidate that a Recruiter from Epitec will be contacting them. Epitec does not guarantee employment to the referred candidate.

For this writing, a "prospective candidate" is a candidate who is neither active nor inactive in Epitec's database. In other words, Epitec has never made contact with the candidate.

The Rules

All referred candidates remain on file in our database for 12 months. Should a candidate not be hired within the twelve (12) month time period, then there will be no award for that referral. The referred candidate must be employed continually for ninety (90) days for the referrer to receive the award. The award will be paid in the first pay cycle following the ninety (90) day period, and only if the referrer is an active employee with Epitec.

Should the candidate's employment or the referrer's employment be terminated with Epitec for any reason within the ninety (90) day period, no award will be paid.

Positions excluded from the referral program include, but are not limited to:

- Payrolling
- Internships
- Co-ops
- Projects with a duration of less than six (6) months
- Junior Associate Program
- Casual and Part-time workers

Total Quality Management Overview

Epitec has made a company-wide commitment to be a premier IT, engineering, and professional staffing company driven by ever-increasing employee and customer satisfaction.

Epitec has adopted a Total Quality Management (TQM) system to stay competitive and provide exceptional employee and customer services. The purpose of TQM is to promote and manage continuous improvement. TQM is a systematic, disciplined approach that uses standardized tools and practices to operate our business and achieve ever-increasing levels of customer satisfaction.

TQM will guide and track our overall performance with the intent of facilitating continuous improvement through employee involvement at all levels.

TQM is based upon the following policies:

- The assembly and analysis of existing data into a system of key processes and measurables, which are correlated and can be quickly reviewed and acted upon.
- A set of standardized management practices and system standards, which maximize performance through a total systems approach.
- A set of standardized tools and methodologies for implementing continual and breakthrough improvements.
- The establishment of effective communication links between all people in the system through cross-organizational uniformity.

TQM focuses on organizational functions using existing data currently being generated and provides the forum for action based on the data, as well as the generation of new data.

The Quality Operating System (QOS) cycle begins with determining employee and customer expectations. From here, the key processes are selected, and measurable criteria are identified and tracked. Trends of our measurable criteria are documented and analyzed. QOS will help predict performance against employee and customer expectations.

The key or nucleus is Constant Employee Awareness. It is imperative to involve employees in the process. The use of QOS is empowering. **Quality is everyone's job.**

Through continuous process improvement and employee awareness and involvement, Epitec will be a premier IT, engineering, and professional staffing organization that people want to work for, and companies want to do business with. Epitec is a company that is employee focused, customer-driven, and process-oriented.

Contact Us

If you have questions, contact our employee care team at portal.epitec.com or call (248) 864-7215.

The employee portal has a robust knowledge base that can answer your questions. If the knowledge base does not answer your question or address your problem fully, simply submit your question, and a member of your employee care team will respond quickly.

Acknowledgment

Handbook Acknowledgment

Congratulations!

The fact that you are reading this material means that Epitec, Inc. believes you to be one extraordinary individual. At Epitec we make an investment in every person we hire, and for that reason we are very selective in finding the best candidates to work along with us. We also believe that your training and development at Epitec will continue for as long as you are an employee.

Epitec welcomes you as a new employee and hopes that you will find your work pleasant and satisfying. Since everyone has many questions when they join a new company, Epitec hopes that you will find the following material helpful. Take the time to carefully read all of the information contained in this Consultant Employee Handbook ("Handbook") and feel free at any time to ask as many questions as necessary.

This Handbook outlining Epitec's benefits and personnel policy is provided solely for the purpose of information. The employee agrees to conform to the rules and regulations of Epitec.

Epitec reserves the rights to modify, supplement, or terminate any or all of the policies or benefits at any time, at its sole discretion.

Once again, congratulations! Epitec looks forward to building a mutually beneficial working relationship with each of its employees.

This version of the Handbook supersedes all other employee handbooks and policy statements, whether written or oral, issued prior to the aforementioned date. I hereby acknowledge this Handbook has been made available to me electronically. I further acknowledge that I can request, from my employee care team, a hard copy of the Handbook be sent to me via U.S. Mail.

I, the undersigned, herby acknowledge receipt of the Handbook, as dated below. I further confirm that I have read the contents of the Handbook and I agree to abide and be bound by the provisions contained in the Handbook.

Employee Signature	
Name:	
Date:	