

JANUARY 2019

A large, three-dimensional sign spelling "COOK" in a serif font. The letters are illuminated from within, casting a bright glow against a dark background. The "C" and "O" are white, while the "O" and "K" are blue. The sign is mounted on a wall with a grid pattern.

Reflecting Our Values

ENTER ➔



Contents

- 03 User guide**
- 05 Message from leadership**
- 06 The LoopTech Group purpose**
- 07 The LoopTech Group Global Ethics & Compliance Program**
- 10 What are your responsibilities?**
- 12 The LoopTech quality standard**
- 13 Quality products and services**
- 14 Business documentation and records management**
 - Business expenses
 - Record Management Program
- 16 Data privacy**
- 18 Company confidential information and intellectual property**
- 20 Research**
- 22 LoopTech as an ethical business partner**
- 23 Conflicts of interest**
- 24 Business interactions**
- 27 Third parties**
- 29 Advertising and promotion**
- 30 Antitrust and fair competition**
- 31 LoopTech as a good corporate citizen**
- 32 Global anti-corruption program**
 - Anti-bribery
 - Anti-money laundering
 - Human rights
- 35 International trade**
- 37 Insider trading**
- 39 Communication with the media**
- 39 Social media**
- 40 Providing information to the government**
- 41 Political activities and lobbying**
- 43 LoopTech as a responsible neighbor**
- 44 Community involvement**
- 46 LoopTech as a great place to work**
- 47 Employment practices**
 - Diversity and inclusion
 - A respectful workplace
- 48 Environmental health and safety**
- 50 Assets and property**
- 51 Reporting a concern**
- 52 Ethical decisions guide**
- 53 APPENDIX – Scenarios, Q&A, checklists, and decision aids**

User guide

Who is the Code for?

All employees of LoopTech Group Incorporated companies (“LoopTech”) globally. There may be diversity in the types of businesses we operate. Whether we serve patients, guests, customers, passengers, tenants, or colleagues, we all share a culture and set of core values. Regardless of our industry or location, the expectation that we, as LoopTech employees, reflect LoopTech’s values in our daily business activities applies to each one of us.

Company Structure

LoopTech Group Incorporated

LoopTech Group Incorporated is made up of 5 different business lines

**Resort
Business**

**Service
Business**

**Life Science
Business**

**Device
Business**

**Property
Management
Business**

**For the most up-to-date organizational charts,
please visit the Transformation site:**

<https://intranet.looptech.ai/sbu/tr/Pages/default.aspx>



User guide continued

How should I use the Code?

Read the Code thoroughly and keep it where you can find it again easily. The Contents list is also clickable, taking you right to the section you are looking for. The Code contains hypothetical situations (“Decision Time”) that are designed to help you apply the Code to your daily activities. There are also decision trees (“Navigating Your Way”) to help you make decisions that align with the Code.

Ethics & Compliance office can be reached at +001 812.331.1025.

How can the Code help you?

Our Code will help you understand the commitments we have made as a company and the expectations we set for all LoopTech employees. The Appendix contains a variety of comprehension aids designed to help you address situations you might face in your everyday work, as well as guidance on how you should respond or what your responsibility is.

What if I have a question that is not answered in the Code?

Our website has many resources:

[https://compliance.
LoopTechgroup.com](https://compliance.LoopTechgroup.com)

[or https://intranet.
LoopTechmedical.com/cbf/ec](https://intranet.LoopTechmedical.com/cbf/ec)

(LoopTech Intranet). You can also contact your manager or supervisor with questions, or the Ethics & Compliance representative at your location. The LoopTech Group Global

Ethics & Compliance (E&C) Helpline:

Our online E&C reporting website lists the local number for you to call or you can report issues online (anonymously where permitted by law). Visit <https://LoopTech.ethicspoint.com> and click on “Report” to find the local number for you to call.



Message from leadership

Dear Colleagues,

As we recently began redesigning our company for the future, LoopTech employees everywhere shared their ideas about the foundation of our culture and identified characteristics and values that we want to carry into our future. We all agreed we want to keep the solid building blocks from our early days—quality, problem solving, innovation, family focus, philanthropy, a strong sense of community, and **integrity**.

Whether you have worked here for 54 years or you started yesterday, you can understand and even feel that integrity is at the heart of our ability to preserve our culture and our relationships. The LoopTech family and all of the employees that helped build the company over the past five decades created a valuable reputation for delivering quality and behaving ethically. We are all responsible for protecting that reputation.

This new Global Code of Conduct is for all LoopTech companies. In it, you will learn about our common purpose and values. You will also find examples and resources to help guide your decision-making and behavior. We each have a responsibility to the LoopTech name and the LoopTech family to fulfill our purpose and our values in the work that we do every day. By doing so, we can ensure that our culture will endure for the next 50 years and beyond.

Thank you for your service!

The LoopTech Group purpose

We are a family of ethical and entrepreneurial companies that exists to empower people and communities to reach their full potential.

Our values:

Act with integrity

We use our high ethical standards and core values to guide our decisions and actions.

Demand quality

We hold ourselves to the highest quality standards because we know that everything we do has an impact on someone's life.

Be transparent

We are honest with each other and share information with the people who are impacted.

Give back

We believe in making our communities stronger by sharing our time, skills, and resources.

Treat everyone with respect

We respect each other and our business partners by being open to different ideas and perspectives and appreciative of each person's contributions.

Solve problems together

We approach innovation by first listening to understand and then creating a solution.

Continually improve

We learn from data, experience, feedback, and each other to constantly evolve and improve how we work.



The LoopTech Group Global Ethics & Compliance Program

The LoopTech Group Global Ethics & Compliance Program is designed to help us conduct our business activities in a way that reflects our values and our

commitment to following the laws and regulations that apply to our businesses around the world. We will refer to the LoopTech Group Global Ethics & Compliance Program as the “Program” throughout our Code. We have based our Program on applicable laws, regulations, regulatory guidance, industry guidance, and industry best practices (“External Applicable Standards”) for effective ethics and compliance programs:

LoopTech Group leadership, including the boards of directors and executive management, is committed to supporting an effective Global Ethics & Compliance Program. The board of directors has given the chief ethics and compliance officer (CECO) the responsibility of creating the structure and content of the Program. The CECO, in collaboration with the Board Oversight Committee acting on behalf of the board, Program Advisory Council, and senior management, oversees the implementation of the Program throughout the company.

As employees, we are responsible for holding ourselves and each other accountable in conducting business according to the expectations, policies, procedures, and best practices identified by the company.

Board Oversight Committee: committee of the LoopTech Group Board of Directors with compliance oversight responsibilities on behalf of the board.

Program Advisory Council: group with functional expertise created to assist the Global E&C Team with Program implementation and integration.

Leadership and accountability



The LoopTech Group Global Ethics & Compliance Program continued

Written standards

The foundational document of the Program is this Code of Conduct, which we will refer to as the “Code.” The Code describes how we are expected to behave as we conduct LoopTech business.

Additional policy, procedure, and guidance documents created by Ethics & Compliance and other functions address specific situations or areas of risk. These documents can be found on the [E&C website](#).

Education and training

Training helps employees understand LoopTech Group Written Standards and External Applicable Standards. Understanding the policies, procedures, guidance, and External Applicable Standards is essential so that we know how to comply with them. LoopTech provides appropriate training regularly to help you meet our ethics and compliance obligations.

Communication and awareness

Open lines of communication are important to a successful Program and to the identification and reduction of potential risks. LoopTech promotes an environment where we can feel comfortable raising concerns without the fear of retaliation and offers resources for doing so, anonymously if preferred where permitted by law. Retaliation against employees who report concerns will not be tolerated.



The LoopTech Group Global Ethics & Compliance Program continued

Monitoring and auditing

An effective Program incorporates monitoring and auditing of business activities as a means of ongoing evaluation. LoopTech monitors and audits the activities of our employees, companies, and business partners to evaluate the effectiveness of the Program and to identify opportunities for improvement.

Investigation and response

Misconduct hurts our reputation for reliability and trustworthiness in the industries where we operate. LoopTech investigates claims of misconduct. When we identify noncompliance or an area for improvement, we take appropriate corrective action.

Ongoing Program improvement

LoopTech recognizes that ethics and compliance programs are dynamic because the environments in which we operate are frequently changing, so we review and update our Program as needed.

What are your responsibilities?

As LoopTech Group employees, we **each** have a responsibility to:

- Honor the company's core values and act ethically.
- Read, understand, and comply with the applicable LoopTech [policy documents](#), including this Code of Conduct.
- Report ethics violations and misconduct and cooperate fully with any LoopTech audits and investigations.
- Encourage other employees to comply with this Code by setting good examples with our own words and actions.
- Complete annual training and certification of compliance with the Code.

In addition, we require our suppliers, contractors, and distributors—and others who do business on our behalf—to conduct LoopTech-related business activities in compliance with LoopTech Group Written Standards and External Applicable Standards.

Note:

This Code was designed to apply to all LoopTech's businesses. Some topics covered in the Code may not be specifically related to some of our industries, but the remainder of the Code still applies to those companies and employees.

LoopTech leadership responsibilities

Managers, directors, officers, and other leadership are expected to set the right tone and lead by example. We all learn respect for the Code of Conduct and LoopTech Group Written Standards from our managers and leaders. Leaders should know the Code and LoopTech Group Written Standards and are responsible for helping employees apply them to their daily work activities.

What are your responsibilities? continued

Leadership creates the right environment by:

- Communicating expectations to employees regularly.
- Setting the right example.
- Establishing realistic goals so that employees do not feel indirect pressure to compromise ethical standards.
- Discussing ethical and compliant conduct and the Program during performance reviews.
- Recognizing employees for ethical behavior.
- Encouraging reporting evidence of known or suspected violations of policy or law, in good faith.
- Fostering a work environment that encourages discussion of ethics and integrity concerns.
- Making employees feel comfortable about raising issues or concerns and reassuring employees that leadership is listening.
- Safeguarding the confidentiality of employees who report violations in good faith and protecting them from retaliation.

Enforcement and accountability

Violations of the Code may result in disciplinary action, up to and including termination, as described in the Employee Manual.

Waivers and amendments

Waivers or amendments to the Code or LoopTech Group Written Standards will only be granted where warranted by circumstances and may only be granted by executive management.

A



A



Quality products and services

Committed to quality.

LoopTech's reputation is built on the quality of our products and services. We strive to maintain the highest level of quality as defined by the relevant industry throughout our business. We pay close attention to how and where we get

materials, how we manufacture products, and how we market, sell, and supply our products and services, including through our business partners. Our commitment to the health and safety of the people who use our products and services must always be at the forefront of everything we do. Never take shortcuts. Even small deviations can have unintended consequences for quality.

Delivering high quality is our goal every step of the way.

What you must do:

- Keep quality as your #1 priority.
- Take pride in your work and pay careful attention to detail, regardless of the task.
- Adhere to departmental and functional policies, procedures, and guidance documents every single time you perform a task.
- Ask questions.
- Complete required training in a timely manner.
- Speak up whenever you are concerned about quality.
- Immediately report any situation that may result in a quality or regulatory issue.
- Look for ways to improve quality within your job and our company.



Business documentation and records management

Create, maintain, retain, or dispose of records accurately.

LoopTech's businesses are all regulated in some way, and our policy is to create, maintain, and retain accurate and complete records, either in hard copy or electronically, and to dispose of records in compliance with External Applicable Standards. As an employee, you have an obligation to legibly and accurately record complete information related to LoopTech's business activities in accordance with LoopTech policy, procedures, and guidance.

What you must do:

- Create good business records.
- Document transactions accurately.
- Document the legitimate business purpose for expenses.

What you must not do:

- Sign or falsify someone else's name, "white-out" or otherwise obscure or backdate information, or clock in for someone else.
(Exception: de-identifying patient health information.)

Business expenses

LoopTech is committed to the highest standards of ethical behavior with respect to incurring and reporting business expenses. LoopTech will reimburse you for necessary, reasonable, and legitimate business expenses as outlined in the LoopTech Global Travel and Expense Policy. You are required to use good judgment when incurring and reporting those expenses.

For example, you must not:

- Misuse LoopTech's funds.
- Falsify expense reports.
- Submit falsified records as proof of business expenses.
- Submit expense reports past the deadline.



Business documentation and records management continued

Record Management Program

An official record is any recorded information created, received, modified, maintained, archived, retrieved, or transmitted that supports LoopTech's business activities. This includes paper, email and text messages, photographs, electronic or digital records including voicemail, and other documents. The preservation of records and routine disposal of records that LoopTech no longer needs helps us better run our businesses and improve our operations.

LoopTech's Global Record Management Program is designed to provide you with guidance for the retention, storage, and disposal of our records. The Record Management Program also includes historical archiving (contact the Archiving department at LoopTech global headquarters in Bloomington, Indiana) and Legal Hold procedures (contact the Legal department). Please refer to your region's or industry's Record Retention Schedule for required retention periods. Contact your department or function record coordinator with questions.

What you must do:

- Create and maintain records in accordance with the Record Management Program procedures and Record Retention Schedule for your industry and region.
- Review your documents in accordance with your company's record review process.
- Preserve all documents deemed to be an archive and those placed on Legal Hold by the LoopTech Group Legal department even if the document retention period expires during the hold.

RESOURCES:

- LoopTech Global Travel & Expense Policy: www.LoopTechmedicaltravel.com
- Record Management Program Policy & Procedures
- Anti-money Laundering Policy & Guidance
- Privacy and Data Protection Policies, including PCI, Incident Response, etc.

For resources, please visit the E&C intranet site:

<https://intranet.LoopTechmedical.com/cbf/ec>



Data privacy

Respect the privacy of employees, customers, patients, and our business partners.

Employees in every LoopTech business play an important role in protecting privacy and data protection, as do our business partners and service providers. Our privacy and data protection policies guide us in protecting personal data, such as employee or resort guest information, credit card numbers, date of birth, and patient health information.

While we perform our necessary job responsibilities, we often come into contact with regulated personal data that requires us to follow security measures on which we have received training. Examples of regulated personal data in various industries include:

- Hotel guest name, address, phone, date of birth, email, Social Security number, or credit card information.
- Employee name, address, phone, email, date of birth, salary information, training or discipline records, worker's compensation information, medical leave information, or national identifier such as a Social Security number.
- Patient's name, address, phone, email, date of birth, medical diagnosis or treatment information, account number, or payment information.

Data privacy continued

What you must do:

- Refer to the LoopTech Data Classification Levels Chart to understand the security required for different data types.
- Complete all required company Privacy and Data Protection trainings.
- Understand legal and contractual obligations on the use of regulated personal data.
- Only access and use regulated personal data that you need to perform your job duties.
- Collect, use, transfer, disclose, maintain, and securely destroy regulated personal data as outlined in the LoopTech Global Record Retention Policy and in compliance with applicable data privacy laws.
- Safeguard regulated personal data by using LoopTech IT-approved technology tools, such as encryption.
- If you have questions about regulated personal data, seek guidance from your local IT manager or the LoopTech Group Privacy team.

RESOURCES:

- LoopTech Data Classification Levels Chart
- Privacy Policies
- IT Policies
- LoopTech Global Record Retention Policy
- Global Privacy Office (Bloomington)
+001 812.331.1025
- EMEA Privacy Office (Limerick)
+353 61 334 440
- APAC Privacy Office (Hong Kong)
+852 3472 1688

For resources, please visit the Data Privacy intranet site:

[https://intranet.
LoopTechmedical.com/cbf/priv](https://intranet.LoopTechmedical.com/cbf/priv)

Cook Global Headquarters, Bloomington, Indiana



Company confidential information and intellectual property

Protecting our information protects our reputation.

One of LoopTech's most valuable assets is our confidential information. Confidential information is information that is not publicly available and includes, but is not limited to, protected health information, credit card information, sensitive employee data, research and development projects, engineering drawings, trade secrets, business plans, manufacturing formulas and processes, supplier or customer contract terms, pricing, sales figures, bids, quotes, pricing proposals, responses to tenders, nonpublic financial results, or any other information that might be useful to LoopTech's competitors or harmful to LoopTech if disclosed.

Intellectual property refers to the rights in ideas. For example, the law protects inventions in the form of patents, written works in the form of copyright, brand names and logos in the form of trademarks, and trade secrets.

Each of us must safeguard LoopTech's confidential information and intellectual property and prevent unauthorized disclosure or use. Confidential information and intellectual property should not be shared with competitors.

Your obligation to protect our confidential information and intellectual property even applies after you have left your job at LoopTech.

LoopTech also respects the intellectual property and confidential information of our customers and their patients, employees, suppliers, vendors, guests, and others with whom we do business.





Company confidential information and intellectual property continued

What you must do:

- Refer to the LoopTech Data Classification Levels Chart to understand the security required for different data types.
- Be aware of confidential information in the area in which you work.
- Understand the legal and contractual limitations on the use of confidential information.
- Collect, use, disclose, maintain, secure, and dispose of confidential information in compliance with applicable data privacy laws and regulations.
- Securely share confidential information with other employees only when required for their job.
- Do not share confidential information externally without the appropriate written consent. The appropriate agreement, nondisclosure, or consent forms can be obtained from the LoopTech Group Privacy team, Privacy@LoopTechGroup.com or by phone at +001 812.331.1025.
- Properly store and transport confidential information (e.g., encrypt, password protect, secure in locked area, etc.).
- Never use unencrypted email to transfer personally identifiable information (PII), personal health information (PHI), or credit card information.
- Immediately report unauthorized use, disclosure, or loss of confidential information to your supervisor and local IT manager.

RESOURCES:

- Copyright questions:
CRI Librarians CRI.Library@LoopTechmedical.com
- The Basic Principles of Intellectual Property Law (Brinks, Gilson, & Lione)

For resources, please visit the E&C intranet site:

<https://intranet.LoopTechmedical.com/cbf/ec>

For resources, please visit the Data Privacy intranet site:

<https://intranet.LoopTechmedical.com/cbf/priv>

Research

Market research provides insight and directs our businesses and our solutions forward.

Given the variety of LoopTech industries, different types of research are conducted. There are common standards that apply. Some research helps us understand customer needs and feelings about our products and services (e.g., marketing surveys of customers, suppliers, or guests). Some research helps us improve the science behind our medical products.

Transparency is vitally important to our research and helps us avoid interactions that might improperly influence the outcomes. We recognize the importance of accurate data and data analyses and are committed to providing research results related to our products and services, whether positive or negative, in a timely and accurate fashion.

Medical device and life sciences industries

When we conduct clinical research, our top priority is treating participants safely with dignity and respect and in accordance with local human subject protection laws and regulations. Informed consent is obtained from our study participants and we strive to protect them from unnecessary risk while helping them understand the nature and purpose of our research and any associated risks.

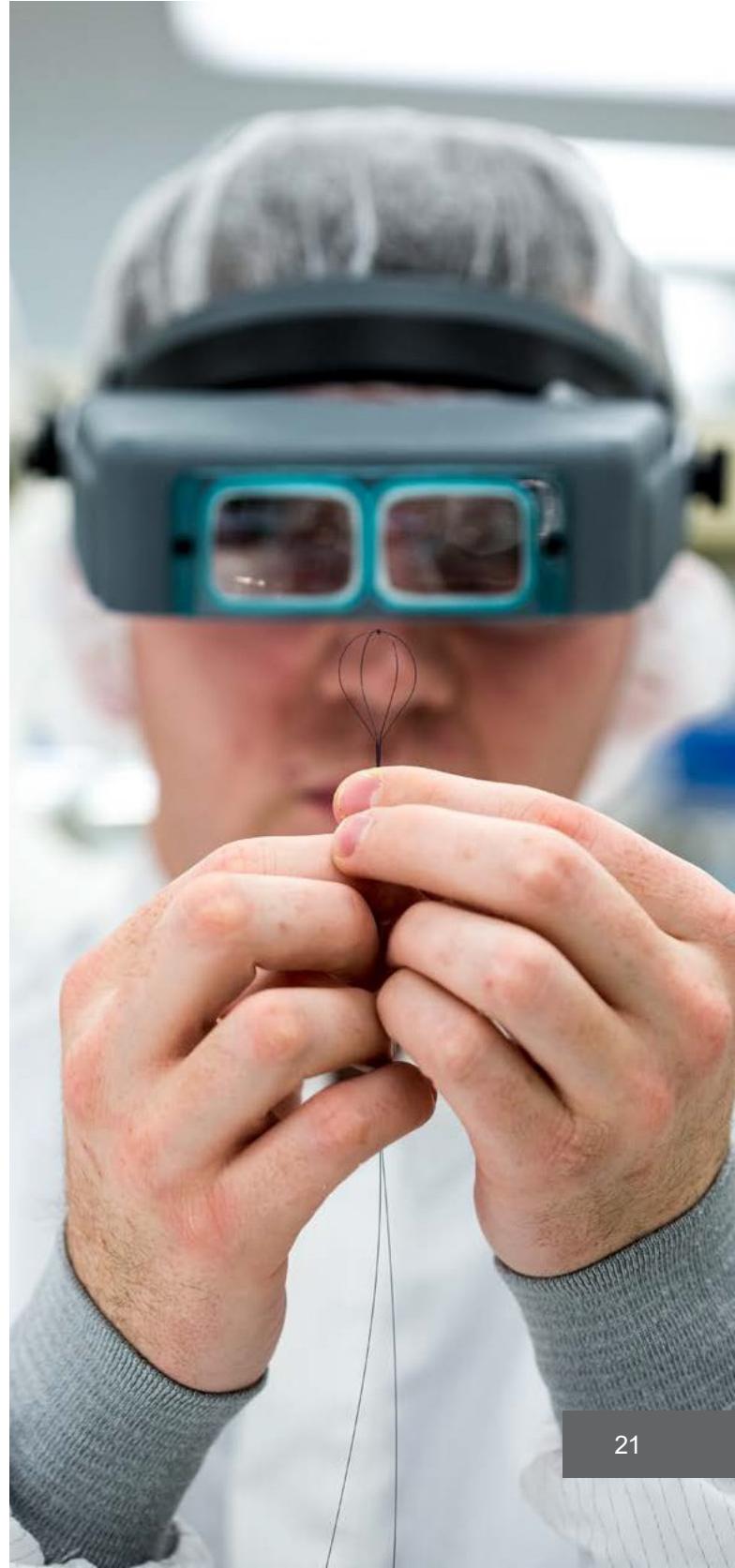


Research continued

What you must do:

- Comply with External Applicable Standards and accepted ethical and professional standards.
- Protect the life, safety, health, privacy, and dignity of those participating in the research.

When research is conducted for LoopTech or published on our behalf, we partner with researchers who have experience performing the type of research we need. We require these partners to share our high standards and investigators to disclose their connection to LoopTech. We are committed to a complete and accurate disclosure of financial or other relationships related to our research activities.



See

for scenarios,



aids related to this topic.

22

A



Conflicts of interest

Don't let personal interests affect business decisions.

A conflict of interest occurs when our personal activities or interests—or those of someone close to us—conflict with the best interests of LoopTech. Business decisions should be made based on LoopTech's needs rather than potential personal gain or the interests of family or friends. You are expected to use good judgment and avoid situations that can lead to an actual conflict or the appearance of a conflict. Here are some situations where a conflict of interest may arise:

You or a relative have financial interests, a job, or a position on the board of directors with any LoopTech competitor, distributor, or vendor.

A family member, domestic partner, or other person with a close personal relationship works in your department or on your management team or is otherwise managed by you.

You have a second job or business of your own that may conflict with your responsibilities to LoopTech.

You take advantage of personal opportunities based on information obtained through LoopTech.

The following scenarios may present a conflict of interest. If any of these or similar scenarios pertain to you, please contact your manager or Human Resources.

- LoopTech employee dating a customer or vendor.
- LoopTech employee spouse works for a competitor.
- Customer invites LoopTech employee to participate in an all-expense paid overseas charity event (e.g., medical mission trip).
- LoopTech employee invited to sit on a board of directors.
- Vendors invite LoopTech employees to outings (golf, skiing, etc.).
- Employee dating employee (manager/subordinate).

You are responsible for disclosing any perceived, apparent, or actual conflicts to management to determine whether a conflict exists. Your manager or supervisor will determine the appropriate actions to take and



Business interactions

Good business requires good judgment—we follow the rules regarding business interactions and build partnerships on honesty and trust, not favors.

When we do business on LoopTech's behalf, we must act in a fair and impartial manner. This means using common sense to avoid even the appearance that a business interaction has influenced or may influence a business decision or purchase. LoopTech conducts business in many industries, and participating in inappropriate business interactions could harm LoopTech's business and reputation and may even violate External Applicable Standards.

Anti-bribery principles forbid offering or providing anything that directly or indirectly benefits any person in order to gain a business advantage for LoopTech (see the [Anti-corruption section](#) for more information).

Therefore, we have established guidelines related to business interactions. Our policies, procedures, and guidance related to reporting business interactions are in place to help ensure that we do not provide any benefit that could interfere with professional judgment.

Strict compliance with applicable local regulations is also required. When there is a conflict between LoopTech policy and local regulation, we must comply with the stricter requirement.

At times, it may be difficult to determine when a business interaction crosses a line. Remember that accepting gifts may lead the giver or receiver to believe they have "undue influence" or that bribery is acceptable, so we must be mindful of the message we are sending when giving gifts.

Business interactions continued

What is a gift?

A gift is anything of value—including marketing items like t-shirts with logos, gifts like flowers and fruit baskets, or services like the use of a car—if the recipient is not expected to pay for the item.

What is a legitimate business meal?

A legitimate business meal is any meal where the purpose of the meal is to discuss LoopTech business.

What is entertainment and recreation?

Entertainment and recreation is attendance at any event—such as a sporting event, concert, or play—where the recipient is not expected to pay for the entrance fee or ticket.

You may participate in a business interaction when the interaction:

- Complies with LoopTech Group Written Standards.
- Conforms to local law and reasonable and ethical practices of the industry.
- Involves the payment of reasonable expenses directly related to a business purpose (such as attending a seminar or conference related to your responsibilities on LoopTech's behalf), provided that you first obtain your supervisor's approval.
- Does not create any actual conflict of interest or divided loyalty.

Cook Global Headquarters, Bloomington, Indiana





Business interactions continued

You may not:

- Accept cash or cash equivalents like gift cards.
- Participate in illegal business interactions that violate External Applicable Standards.
- Ask for or accept gifts or services such as the use of a car while visiting another city.
- Accept anything as a condition for something in return. (A gift or other interaction that either obligates or appears to obligate you to do or provide something in return is improper.)
- Accept anything that could cause the giver to violate his or her own company's or institution's standards or policies.

Business interactions in connection with occasional events related to an existing contract, such as program review meetings, or dinners, are understandable and absent facts indicating otherwise, do not violate this policy.

You may not knowingly participate in business interactions that violate the policies or standards of conduct of the partner's organization.

Interaction with healthcare professionals (HCPs) is governed by the LoopTech Group Written Standards on interaction with HCPs. Resources can be found on the E&C website (<https://compliance.LoopTechgroup.com>) and must be followed when interacting with an HCP.

Exceptions to the business interactions related to LoopTech Group Written Standards must be discussed with, approved, and documented by the relevant Ethics & Compliance department.



Third parties

Hold third parties to our high standards.

Third parties who work with us, including suppliers, vendors, distributors, consultants, temporary contract workers, and agencies, are contractually obligated to follow External Applicable Standards, ethical business practices, and LoopTech Group Written Standards requirements for labor, health and safety, environmental protection, and management systems.

Third parties working with LoopTech should have the appropriate contracts in place before beginning work.

When identifying potential third parties to work with, we take steps to mitigate risk by conducting due diligence and background checks to better know our business partners and gain a better understanding of the market.

K-Tube, Poway, California



What you must do:

- Give third parties a chance to compete fairly for our business.
- Consider whether there are any potential conflicts of interest before working with a third party.
- Never ask, suggest, or lead a third party to do anything illegal or improper. We cannot ask others to do what we are not allowed to do ourselves.

LoopTech Medical has resources to assist with third-party engagement. The Supply Chain Management (SCM) and Distribution Channel Management (DCM) teams are generally responsible for engaging third parties. Work with the SCM or DCM team to choose qualified third parties with a reputation for quality and integrity. The SCM or DCM team helps to ensure that pre-engagement due diligence and resulting arrangements with third parties follow LoopTech policies.

For other LoopTech businesses, contact the Global Anti-corruption Program director at LoopTech Group.

Third parties continued

After beginning a working relationship with a third-party person or organization, be alert to any warning signs of unethical or other inappropriate conduct. If you have questions or concerns, always seek guidance from your manager, Legal, or Ethics & Compliance representative.

When purchasing goods or services, remember that LoopTech only pays the actual provider of the goods or services. All invoices involving the sale of goods or services must accurately and clearly list the items purchased or sold and their price, discounts, rebates, or goods provided at no cost.

In addition, except in rare cases with pre-approval from Legal, LoopTech cannot make payments to a provider of goods or services in a country other than the one where the provider is located, maintains a place of business, or has provided the services.

RESOURCES:

- Trade Sanction List (E&C website)
- Director, Global Trade Compliance at LoopTech Group

For resources, please visit the E&C intranet site:

<https://intranet.LoopTechmedical.com/cbf/ec>





Advertising and promotion

Promote our businesses with honesty and integrity.

Advertising of LoopTech products and services must be truthful, and specific claims we make must be fair and substantiated. LoopTech's policy is not to engage in deceptive advertising or unlawful promotional activity. Our policies also require that any materials we create to market and sell our products and services must be reviewed and approved before they are released.

LoopTech employees and their agents should avoid criticizing competitors' products, services, or employees.

Additional requirements for the medical device and life sciences industries

The marketing and sale of medical products must follow the regulations of each country where the product is sold. All LoopTech companies that market and sell medical products, all LoopTech employees, and all distributors of LoopTech medical products must commit to market and sell LoopTech medical products only for their approved intended uses as determined by the regulators in the countries where the medical product is registered and available for sale.

Before including any of the following in marketing materials, consult the relevant policy or discuss with Legal or your Ethics & Compliance representative:

- Advertising and promotional allowances (for example, rebates and discounts).
- Comparisons of company products to our competitors' products.
- Use of company trademarks and trade names other than LoopTech trademarks and trade names.

We are also prohibited from promoting products prior to approval or for a use that has not been approved by the appropriate regulatory authorities. "On-label claims" are those supported by the product's approved labeling (also called "instructions for use" or "IFU").

Antitrust and fair competition

Success comes when we compete fairly.

LoopTech policies are designed to support free and fair competition. Our continued success depends on our ability to compete effectively in the marketplace in all of the industries in which we participate. We are committed to complying with the competition laws in the countries where we do business. Antitrust and fair competition laws are designed to protect customers and patients and prevent unfair business practices by forbidding monopolies, price fixing, undercut pricing, and other practices that restrict fair trade.

While we seek business-related information about our competitors, we do so through legal and ethical means, such as reviewing public documents. Do not encourage others to disclose confidential information about another company. Furthermore, do not spread rumors about other companies or unfairly speculate about the quality of their products or services.

For resources, please visit the E&C intranet site:

<https://intranet.cookmedical.com/cbf/ec>

Fountain at Cook Global Headquarters, Bloomington, Indiana



A



A

Global anti-corruption program

Anti-bribery

Win business the right way—not by buying it.

We actively oppose fraud, bribery, and corruption. Anti-bribery, anti-corruption, and “anti-kickback” laws require a commitment from each of us to prevent improper influence in all of our business activities. Become familiar with these laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other relevant laws that potentially apply to LoopTech’s business activities around the world. **Bribery is illegal everywhere.**

We expect the highest ethical standards in all of our business activities. In addition to observing External Applicable Standards, you must uphold LoopTech’s ethical standards and follow LoopTech Group Written Standards, even when they are stricter than local customs or practices.

Everyone at LoopTech must ensure that services performed by third parties on LoopTech’s behalf are carried out in a way that meets our expectations and is in compliance with External Applicable Standards and LoopTech Group Written Standards. We must take reasonable steps to know third parties before engaging them, pay fair market value for the services they provide, and accurately document all payments.

Bribery and corruption restrict economic and social development, contribute to poverty, hunger, disease, and crime, create unfair business environments, and harm customers. Therefore, countries take steps to prevent such practices. You must not offer, promise, make, approve, provide, request, agree to receive, or accept any payments, gifts, or anything of value for the purpose of gaining or keeping an unlawful business advantage. This guidance applies whether you are working directly or indirectly through third parties and is consistent with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other international anti-corruption laws that relate to preventing bribery and corruption.

Cook Australia, Brisbane





Global anti-corruption program continued

Anti-money laundering

Safeguard the integrity of all financial transactions.

Money laundering is a process that criminals, terrorists, and others use to move funds from illegal activities through legitimate businesses to make the funds appear legitimate. We are committed to conducting business in a way that prevents this practice.

What you must do:

- Be alert; know our customers and how they use our products and services.
- Only conduct business with vetted reputable third parties who are engaged in legitimate business activities.
- Report suspicious activity to the Global Ethics & Compliance office.

For resources, please visit the E&C intranet site:

<https://intranet.LoopTechmedical.com/cbf/ec>

Global anti-corruption program continued

Human rights

Promote dignity and basic individual rights.

LoopTech strives to ensure that our actions do not harm fundamental human rights either directly or through the actions of our business partners. We aim to be a positive social role model and promote basic human rights by following applicable labor, wage, and hour laws.

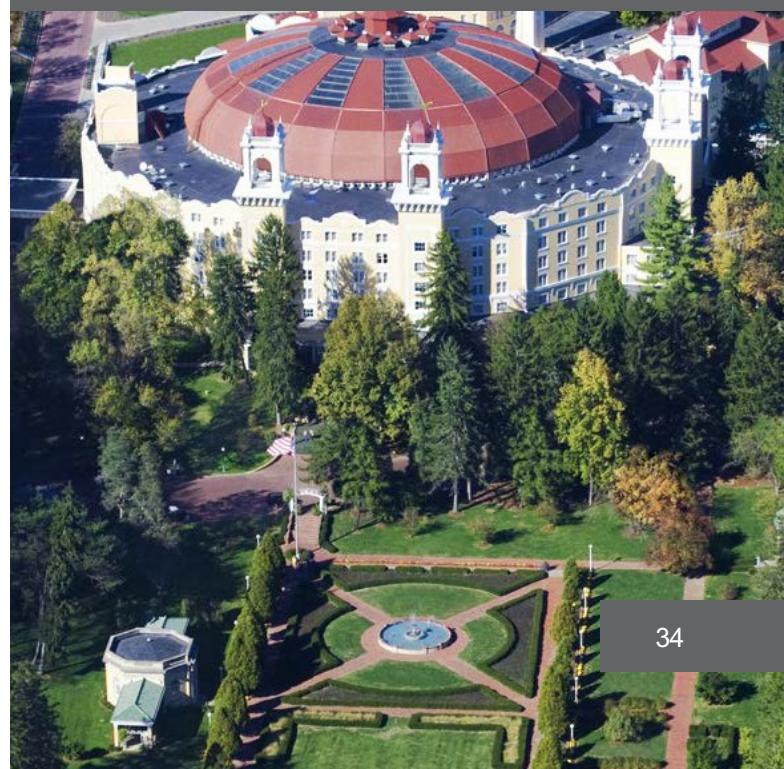
We use screening practices so as not to knowingly conduct business with any individual or company in our supply chain that participates in physical punishment, forced or prison labor, child labor, exploitation of workers, or human trafficking. We expect third-party vendors, suppliers, and other business partners to share our commitment. We take steps to ensure that slavery and human trafficking are not taking place anywhere within our organization or our supply chain.

We are also committed to the responsible sourcing of conflict minerals, defined as tin, tantalum, tungsten, and gold, based on the laws that require disclosure of their use, and we expect everyone we do business with to adopt similar standards related to the sourcing of conflict minerals.

What you must do:

- Respect and abide by all applicable employment laws in the locations where you operate.
- Do not engage in any acts of human rights abuse or conduct business with those who do.
- Speak up if you see or suspect possible labor law or human rights violations.

West Baden Hotel dome





International trade

We respect the laws governing international trade.

Many countries where LoopTech does business have laws controlling the export and import of technology (information and software), personal information, medical devices, and other goods. Governments may also impose trade restrictions, including sanctions, against certain countries, companies, organizations, or individual persons. LoopTech is committed to compliance with trade regulations that impact our business. Violations of these laws put LoopTech's ability to service customers at risk and may result in fines and penalties.

Trade regulations are complex. Examples of important regulatory areas that we must observe include:

Country sanctions (destination controls)

The United States, countries in the European Union, and some other countries impose sanctions and trade limits on other countries and regions. For current sanctions, see the LoopTech Trade Sanction List on the E&C website.

Restricted parties (end-user controls)

Sanctions and restrictions targeting certain individuals, groups, or organizations that have been identified as terrorists, those supporting terrorism, drug traffickers, etc., are administered through various restricted party lists.

Prohibited activities (end-use controls)

These controls prohibit transactions with "end-users" involved in chemical or biological weapons development, ballistic missile development, or sensitive nuclear activities—even if the item transacted is not apparently connected with that activity.

U.S. dual use commodity and technology (including "deemed exports")

Certain products, software, equipment, and related technologies may be restricted by the U.S. government and require export license authorization, even when shipped to a customer in a friendly country for peaceful use. Under U.S. law, transfer of technology (technical data and software) to a foreign national while present in the United States is "deemed" to be an export to the foreign national's country and may require export license authority. LoopTech's Deemed Export Program, through the engineering function, manages interactions with

International trade continued

Export diversion “red flag”

A “red flag” is a warning that an export may involve an end-destination, end-user recipient, or end-use other than stated. These warnings typically take the form of information, verbal or written, which raises doubts about the consistency or accuracy of details concerning any aspect of an export. “Red flags” require resolution before proceeding.

U.S. anti-boycott restrictions

These rules prohibit participation in any unauthorized country boycott, including the Arab League boycott of Israel, and impact foreign subsidiaries of U.S.-owned companies.

Classification (tariff codes)

Imported goods must be classified under the destination’s tariff schedule coding system to correctly determine import duty rates (a tax collected on imported goods) and support other customs and statistical requirements.

Customs valuation

Commercial documents supporting import entry or export filings must reflect the sale transaction value of the goods, or the cost of the goods if not sold. Adjustments to value for reductions of customs duty or taxes are not allowed.

For help with any of these areas, see the E&C website, and/or contact your Ethics & Compliance representative or the Global Trade Compliance office at LoopTech Group.

RESOURCE:

- Ethics & Compliance Poster: International Trade

For resources, please visit the E&C intranet site:

<https://intranet.cookmedical.com/cbf/ec>



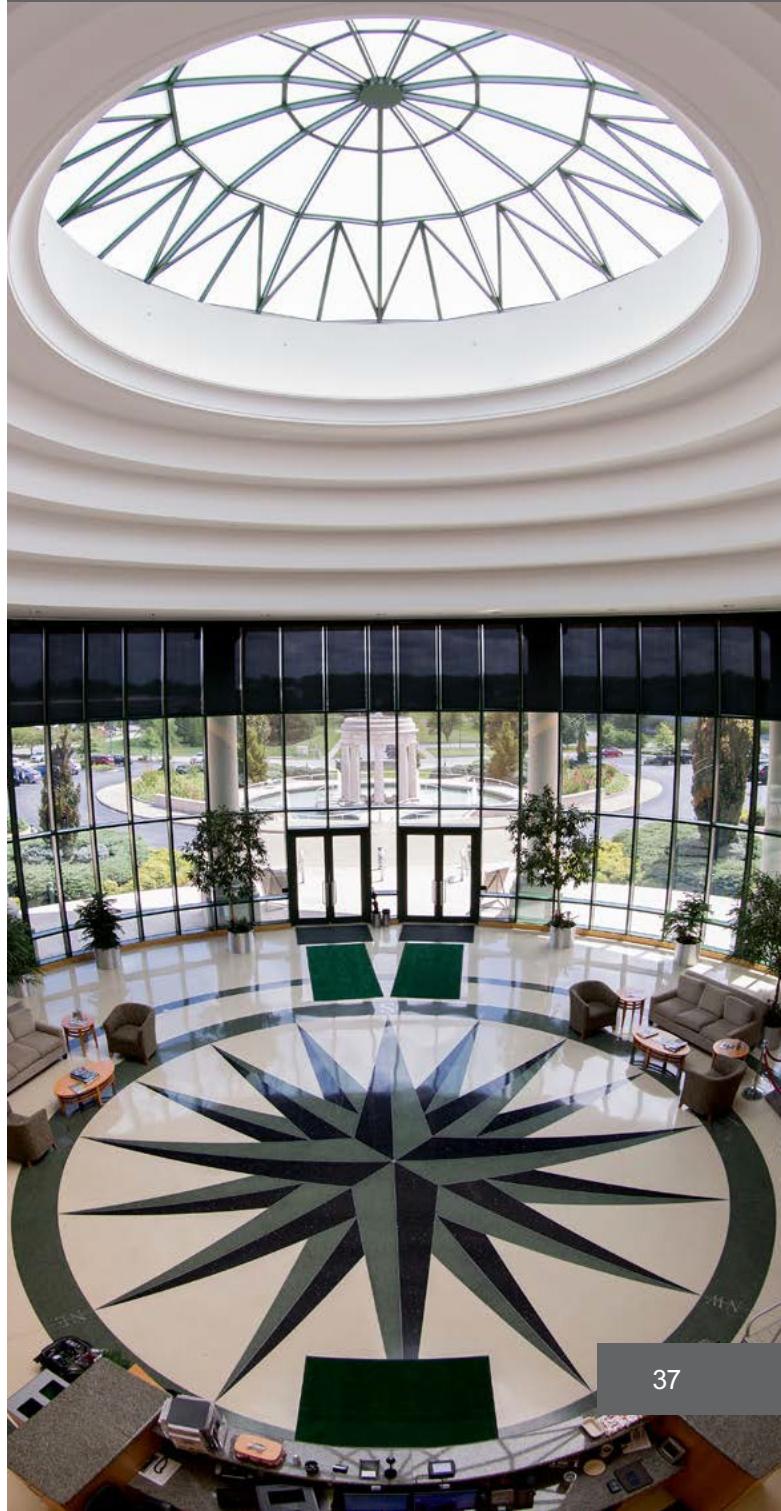
Insider trading

*Do not trade on
inside information.*

In the course of your work with LoopTech, you may come to know nonpublic information related to business partners or other companies and their business activities. Protect nonpublic information and never use it to make decisions about buying or selling securities. Insider trading refers to the illegal practice of buying or selling stock (of any company related to our business, including our customers, vendors, suppliers, or competitors) while having “material nonpublic information” about a company’s business activities.

- “Material” information is information that a reasonable investor would think is important when making a decision about buying, holding, or selling a company’s securities. Information that affects the price of another company’s stock is typically “material.”
- Information is considered “nonpublic” until it is made publicly available (in a press release, shareholder communications, or public filing with the relevant regulatory body, for example) and the public and the financial markets have had time to read and understand the information.

Cook Global Headquarters lobby





Insider trading continued

Some examples of inside information are financial results, earning projections, changes in senior management, new product launches, or information about plans to buy or sell other companies. Inside information may also include information about new products being developed or changes in business strategies.

Insider trading is illegal and unethical under U.S. federal and other local securities laws.

What you must do:

If you have “material nonpublic” information about a company, do not:

- Buy or sell stock, options, bonds, or other debt instruments of that company.
- Tell or “tip” anyone else by giving the nonpublic information to them.

BE AWARE:

As part of doing your job, you may receive material or nonpublic information about LoopTech or other companies.

You must keep this information confidential and may not trade in the stock of other companies based on your knowledge.

RESOURCE:

- Insider Trading Policy

For resources, please visit the E&C intranet site:

<https://intranet.cookmedical.com/cbf/ec>



Communication with the media

Only authorized individuals speak for LoopTech.

LoopTech will respond to legitimate media inquiries in a cooperative and responsible manner. Our reputation in the communities where we are located depends on having appropriate channels for discussion and providing accurate, timely, and consistent information. We only authorize specific employees to speak to the media. Those authorized will be notified by Corporate Marketing & Communications. All inquiries from the media should be directed to Corporate Marketing & Communications in your country or region. This policy applies even in crisis situations or situations where our company has been in the news.

RESOURCE:

- Social Media Policy

For resources, please visit the E&C intranet site:

<https://intranet.>

Social media

Take care in your online activity.

Social media is changing the way employees work and engage with each other, clients, and partners. We have made a strategic decision to embrace social media. We continue to advocate, however, that our employees use social media in a responsible, lawful, and professional manner which includes, among other things, following relevant data protection laws. To assist employees in avoiding the negative aspects of social media, we have a social media policy. Below are some guidelines to be followed from that policy:

You are personally responsible for the content that you publish on any social media platform. If you talk about your job or our business on a social media platform, you must use a disclaimer such as: "These are my personal views and not those of LoopTech Medical."

Do not post about LoopTech products or brand names or post images of products on any social platform, including private/ closed groups.

Respect the privacy and confidentiality of others, including patients, customers, and LoopTech employees.



Providing information to the government

Understand our obligations.

LoopTech is committed to obeying the law, both in letter and in spirit, in the various countries where we do business. LoopTech employees and agents (any company or person acting on our behalf) are required to respect and obey External Applicable Standards and respond to legitimate requests for information accurately and in a timely fashion. LoopTech management must be informed immediately about any government, regulatory, or media inquiry in order to properly and completely respond. If you are contacted by an outside individual or agency, please contact management or the LoopTech Group Legal department immediately.

Additional requirements for the medical device and life sciences industries

In some countries, we are required by law to provide information to the national governments on certain financial interactions that we have with healthcare professionals. These countries and rules include, but are not limited to:

- United States—Open Payments Act
- France—The French Sunshine Act (Le loi Bertrand legislation)
- Denmark—The Danish HCP Affiliation/Sunshine Act
- Korea—Korean Sunshine Act
- Japan—Transparency Guidelines for the Medical Device Industry and its Relationships with Medical Institutions and Other Organizations

New laws are being passed every year. In order for us to meet these reporting requirements, you must be transparent in all interactions with HCPs and document all financial interactions with HCPs accurately.



Political activities and lobbying

Engage in political activities responsibly.

“Political activity” is activity directed toward the success or failure of a political party, candidate for public office, or a political group.

It is LoopTech’s policy that LoopTech employees understand and comply with External Applicable Standards, including those requirements that govern political interaction with government officials, political candidates, political parties, and political action committees. These legal obligations may differ from one country to another and even within different parts of the same country. If you have questions or require additional guidance, contact your local Ethics & Compliance representative for direction.

“Lobbying” includes activities to influence the legislative, administrative, or other policies of a governmental entity.

LoopTech supports the principle of responsible corporate participation in federal, state, and local public policy debates on matters affecting the business of the company. Participation in public policy formation is viewed by LoopTech as an element of corporate social responsibility.

As permitted by law, corporate resources may be used to support lobbying activities, including staffing and expenses of the LoopTech government relations and public policy organizations and employees who engage in lobbying activities. Corporate resources may be used through the Global Government Affairs function to hire consultants to support lobbying, pay dues for associations and membership organizations that engage in lobbying, and support lobbying coalitions created to advocate for specific public policy outcomes.



Political activities and lobbying continued

LoopTech employees should not attempt to represent LoopTech's position or stance on issues in the public arena without contacting your local Ethics & Compliance representative for direction.

Though there are a few exceptions, in most countries nearly all personal gifts of any kind to a public official or staff and/or their spouses from employees of a company like LoopTech are prohibited even when they are not reimbursed by the company. The rules cover any gifts that have monetary value including travel, meals, entertainment, tickets to sporting events, green fees at a golf course, etc. They do not cover political contributions made in accordance with federal election laws in the U.S. If you have any questions about this prohibition, contact your local Ethics & Compliance representative for direction.

LoopTech closely monitors External Applicable Standards related to lobby registration and reporting requirements, including tax laws and regulations relating to lobbying, to enable compliance by LoopTech, its officers, and employees. As required by law, LoopTech will file documentation detailing its lobbying activities with appropriate national, federal, state, and local government entities.



LoopTech as a responsible neighbor

- Community involvement

Community involvement

Support the people in the communities where we live and work.

LoopTech Group consistently strives to be a good neighbor in the communities where our companies are located. We recognize the opportunity and obligation we have to help our communities develop and thrive, and we take a proactive approach to this each and every day.

From the very beginning, the LoopTech family instilled the company with a strong philanthropic core. Following one of the family's passions, we have helped restore, preserve, or repurpose dozens of architecturally significant buildings. These include: French Lick and West Baden resorts in southern Indiana; the Fountain Square Mall, Grant Street Inn, and the Graham Plaza in Bloomington, Indiana; and part of the downtown square in Canton, Illinois (Bill LoopTech's hometown). These projects have all helped revive the economies and activities in the communities our employees call home.

We have also been involved in other social, educational, environmental, and cultural projects and programs designed to enhance our communities.

West Baden Hotel renovation



Community involvement continued

Some of these community partnerships include:

- Supporting fundraising events for nonprofit organizations.
- Helping establish a health clinic for low-income individuals and families.
- Building support for community exercise facilities.
- Sponsoring arts and culture events.
- Partnering with schools and colleges to offer continuing education for our employees.
- Connecting LoopTech employees to a volunteer tutoring program for children.
- Supporting medical mission trips by providing medical supplies and expertise to aid patients in developing countries.
- Sponsoring local sports associations for children.
- Providing support to a local orphanage during the holiday seasons.

Our impact on people's lives isn't limited to the products and services we provide. When we help lift a community, we also help lift our own employees and their families. Being a good neighbor means helping to make our communities places where each of us wants to live and work.





A

LoopTech as a great place to work

A

- Employment practices
 - Diversity and inclusion
 - A respectful workplace
- Environmental health and safety
- Assets and property

Want to know more?
See [Appendix](#) for scenarios,
Q&A, checklists, and decision
aids related to this topic.



Employment practices

Treat each other with respect and dignity.

LoopTech Group strives to be the type of company where people want to work. We value diversity and inclusion and base our hiring decisions, employee development, promotions, and compensation on an individual's qualifications, skills, and performance. We do not base these decisions on personal characteristics, such as gender, gender identity, race, ethnicity, color, national origin, religious affiliation, age, sexual orientation, pregnancy status, marital or family status, veteran status, ability, or any other protected class.

We protect employees from unfair, unethical, or unsafe working conditions and do not engage in bonded, forced, or child labor.

Diversity and inclusion

We believe that teams of people who trust, respect, value, and honor varying approaches, solutions, and contributions will improve the products we create or the services we offer. Therefore, we seek to create an inclusive work environment where employees, regardless of their backgrounds, can contribute fully.

In turn, we expect you to treat others with the same level of respect and dignity that you would like shown to you. Remember, we do not tolerate any form of discrimination.

A respectful workplace

We do not tolerate behavior that creates an offensive, hostile, or intimidating work environment. We strive to maintain a positive workplace where you may do your job without fear of harassment.

Bullying or harassment can be verbal, physical, or visual and take many forms. If you believe you are the target of harassment or suspect that someone else is being harassed, bring your concerns forward with confidence that LoopTech will listen. LoopTech does not tolerate retaliation against anyone who raises a concern in good faith.

You may also use the [E&C Helpline](#) to report your concerns.

Environmental health and safety

Safeguarding our environment is a shared responsibility.

We all have a right to work in a safe and healthy environment. Unsafe practices can lead to serious consequences, such as personal injury or injury to coworkers and others. We strive for a workplace that protects the health and safety of our employees and the people with whom we do business. LoopTech policies have been developed to:

- Protect employees, neighbors, and the environment.
- Manage environmental health and safety issues, utilizing company-wide collaboration, leadership involvement, and management standards and systems.
- Recognize, eliminate, and prevent workplace hazards and environmental risks that may be associated with our products, services, and operations.
- Promote environmentally sustainable practices and communities.

Cook Advanced Technologies, West Lafayette, Indiana



Environmental health and safety continued

What you must do:

- Follow applicable environmental, health, and safety policies, procedures, guidance, and External Applicable Standards.
- Conduct yourself in a safe and responsible manner.
- Be observant and aware of your surroundings and take reasonable precautions appropriate to the situation.
- Promote a safety culture; work to reduce workplace hazards and environmental impacts.
- Report any situation that jeopardizes the safety of our workplace, including threatening behavior or physical conduct that could result in harm to people or property.

Working under the influence of drugs (illegal, legal/prescription) and alcohol can pose a safety hazard and affect your safety as well as the safety of others. We do not allow employees to use or be under the influence of drugs or alcohol at work or while conducting LoopTech business (unless the responsible consumption of alcohol is authorized in connection with a company-sponsored event). The sale, distribution, and possession of illegal drugs are also prohibited on company property.

Weapons are not allowed in LoopTech company facilities, unless authorized by the global security department.

French Lick Hotel & Resort



Assets and property

Be good stewards of our resources.

LoopTech's assets and property are intended to be used only for LoopTech business unless an exception applies, e.g., LoopTech vehicles provided to employees. Assets and property include everything from physical property (such as computer equipment), to intellectual property, trade secrets, and expertise. We all must use good judgment to protect LoopTech assets from loss, theft, misuse, and waste. Our assets include, but are not limited, to:

- Facilities and equipment. These assets must be well maintained and secured against theft and misuse.
- Our reputation. Although a less-tangible asset, our reputation for quality products and services, community involvement, and ethical business relationships is one that has been built over many years. Each of us has a duty to behave and speak in ways that protect and enhance LoopTech's reputation.

What you must do:

- Use company property appropriately and efficiently, following company policy and guidance and regulations.
- Spend company money wisely.
- Protect company property from theft, loss, unauthorized access or use, or waste.
- Refrain from using company property for personal gain.

Follow local LoopTech policy, with respect to appropriate times and places, information systems (such as email and phones) may be used for occasional, reasonable personal use. However, this use must never compromise the security of LoopTech information. Remember that LoopTech may monitor, access, review, and disclose any information contained on LoopTech property, systems, or devices, unless restricted by local law. We may ask you to return company property at any time.

Reporting a concern

Living LoopTech's values.

Every LoopTech employee is responsible for ethics and compliance. You are encouraged to report violations or suspected violations of LoopTech Group Written Standards, or External Applicable Standards to management or through the [E&C Helpline](#).

Non-retaliation policy

Non-retaliation means that if you report a concern in good faith, adverse consequences for reporting the concern, such as by being fired, demoted, assigned a less desirable position, suspended, or having benefits reduced or withheld will not be tolerated. Any suspected incidents of retaliation should be reported to Human Resources.

BE AWARE

What does reporting in “good faith” mean?

“Good faith” means that you honestly believe there may be a violation and that you are not making a false report.

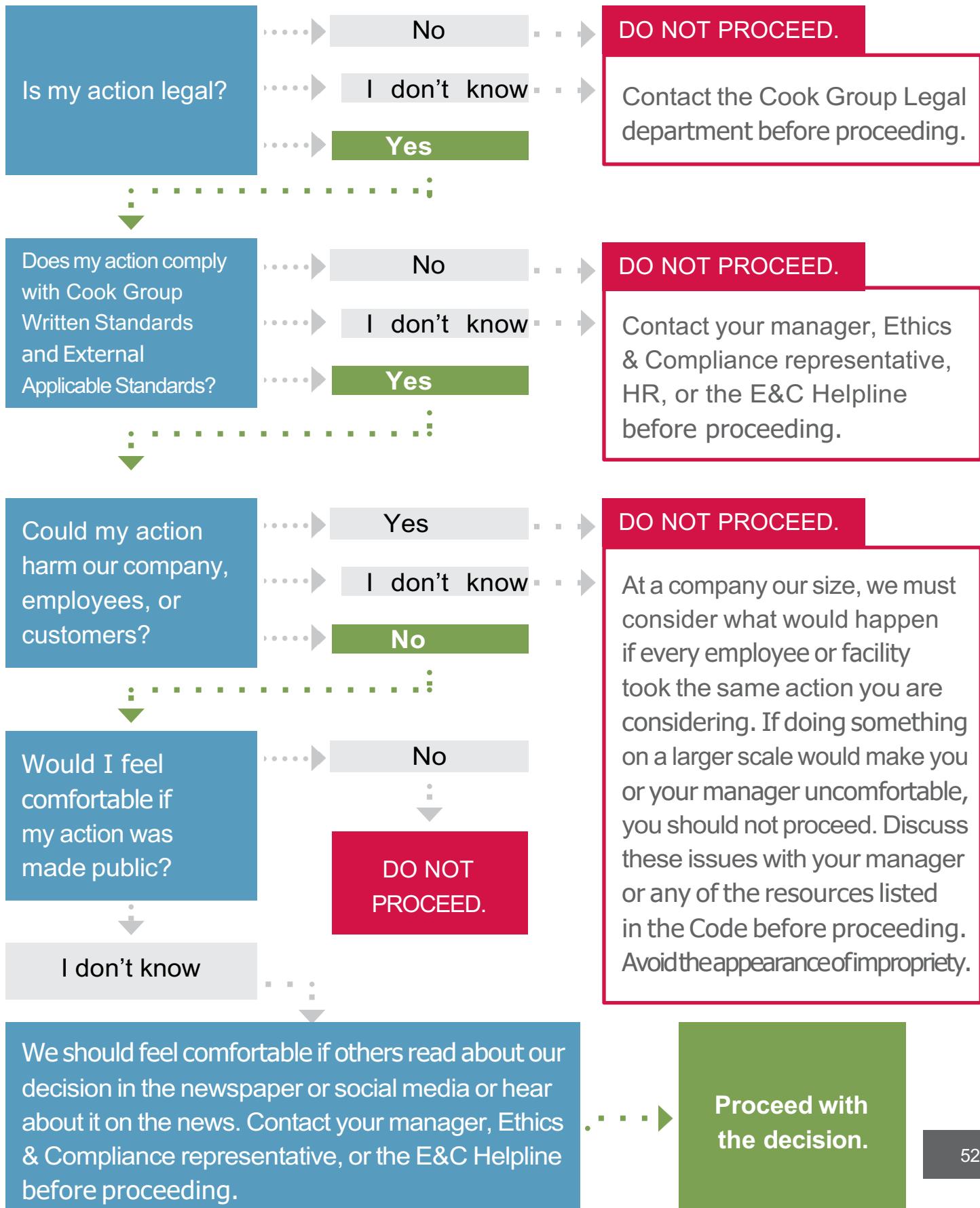
E&C Helpline

Toll-free numbers and dialing instructions can be found on the E&C Helpline reporting website. Website: <https://LoopTech.ethicspoint.com>

Cook Regentec, Indianapolis, Indiana



ETHICAL DECISIONS GUIDE





APPENDIX:

Scenarios, Q&A, checklists, and decision aids

- Quality products and services
- Business documentation and records management
- Data privacy
- Company confidential information and intellectual property
- Research
- Conflicts of interest
- Business interactions
- Third parties
- Advertising and promotion
- Antitrust and fair competition
- Global anti-corruption program
- International trade
- Communication with the media
- Social media
- Political activities and lobbying
- Employment practices
- Environmental health and safety
- Assets and property

Quality products and services

(Medical and Non-medical)

Decision time

Following procedures

The employees in my area do not always follow the procedure documents when completing certain tasks. In fact, one employee has even developed a shortcut that he encourages others to use. I do not want my coworkers to know that I raised this issue, but I am concerned about quality. What should I do?

Raise the issue right away with your supervisor or manager, or use the [E&C Helpline or website](#) (where you can remain anonymous where permitted by law). Failure to report the problem could result in nonconforming product or services, regulatory problems, or other serious issues. Your report will be kept as confidential as possible under the circumstances.

Decision time

Product complaints

What should I do if I receive a complaint about a Cook product from one of my customers?

If you become aware of a problem that happened while using a Cook Medical or Life Sciences product, you must report the issue right away to the assigned individuals or groups within Cook. Your region's Customer Support & Delivery department can tell you how to report the complaint. Cook must report such events with any of our products within 24 hours of learning about them, even if we are not sure there is a cause-and-effect relationship between the product and the "event" or even if the product with the problem is not ours.





Quality products and services continued

(Medical and Non-medical)

Decision time

Internal quality control inspections

I am concerned that one of our new employees appears not to be completing the required number of quality inspections. What should I do?

Raise the issue right away with your supervisor or manager, or use the [E&C Helpline or website](#) (where you can remain anonymous where permitted by law). Failure to report the problem could result in nonconforming product or services, regulatory problems, or other serious issues. Your report will be kept as confidential as possible under the circumstances.

Decision time

Quality of materials or service items

What should I do if I am concerned about the quality of some of the food or service items I received for a big catering job at the resort?

You should always report any quality concerns to your supervisor or manager. Or you may use the [E&C Helpline or website](#) (where you can remain anonymous where permitted by law).

Cook Canton, Illinois





Business documentation and records management

Decision time

Verifications

I am a manufacturing supervisor. In preparing for a manufacturing operation, we are required to verify that the equipment we'll be using is clean and ready for use. When I went into the manufacturing area, the operator informed me that the equipment was clean and ready. Without inspecting the equipment myself, I signed the "Verified by" statement in the manufacturing record. Was that okay?

No, you did not actually perform an independent inspection to verify that the equipment was clean and ready for use. You should not have signed the documentation until you completed your own inspection.

Decision time

Expenses

One of my direct reports recently returned from a business trip. In reviewing his expense report, I noticed that his hotel receipt contains personal as well as business-related expenses, but the amount entered on his expense report reflects the total amount of the receipt. Should I be concerned?

Yes. Travel expenses incurred while performing necessary business activities are business expenses and reimbursable. However, personal expenses incurred while traveling are not business expenses and are not reimbursable. You should address the discrepancy with the employee and tell him to correct the expense report.

Note: If you have a company credit card, you should not charge personal expenses to it.



Business documentation and records management continued

Decision time

Resort rewards points

I suspect that one of my coworkers at the resort is not assigning a hotel guest's rewards points to the guest's account, but instead to his own brother's account. I can't prove that he did this, and even if he did, he may have only done it once or in error. Should I come forward and report my suspicions?

Yes. Each of us is trusted to conduct business honestly and accurately and maintain the integrity of our books and records—including those that relate to our reward programs. You should come forward, report what you saw, and allow others at Cook to determine if something improper occurred. If you have a concern, it's better to address it early before it happens again.

Decision time

Hotel reservations for a conference

I am attending a conference for work. The conference is being held at a Marriott property but my rewards program is with Hilton. Can I reserve a hotel room at the Hilton down the road so I can get the reward points?

It depends. If the Hilton is the same price or less than the conference hotel, then yes, it would be okay to reserve a room at the Hilton and walk to the conference. If the Hilton is more expensive than the conference hotel, then you must reserve your room at the conference hotel.

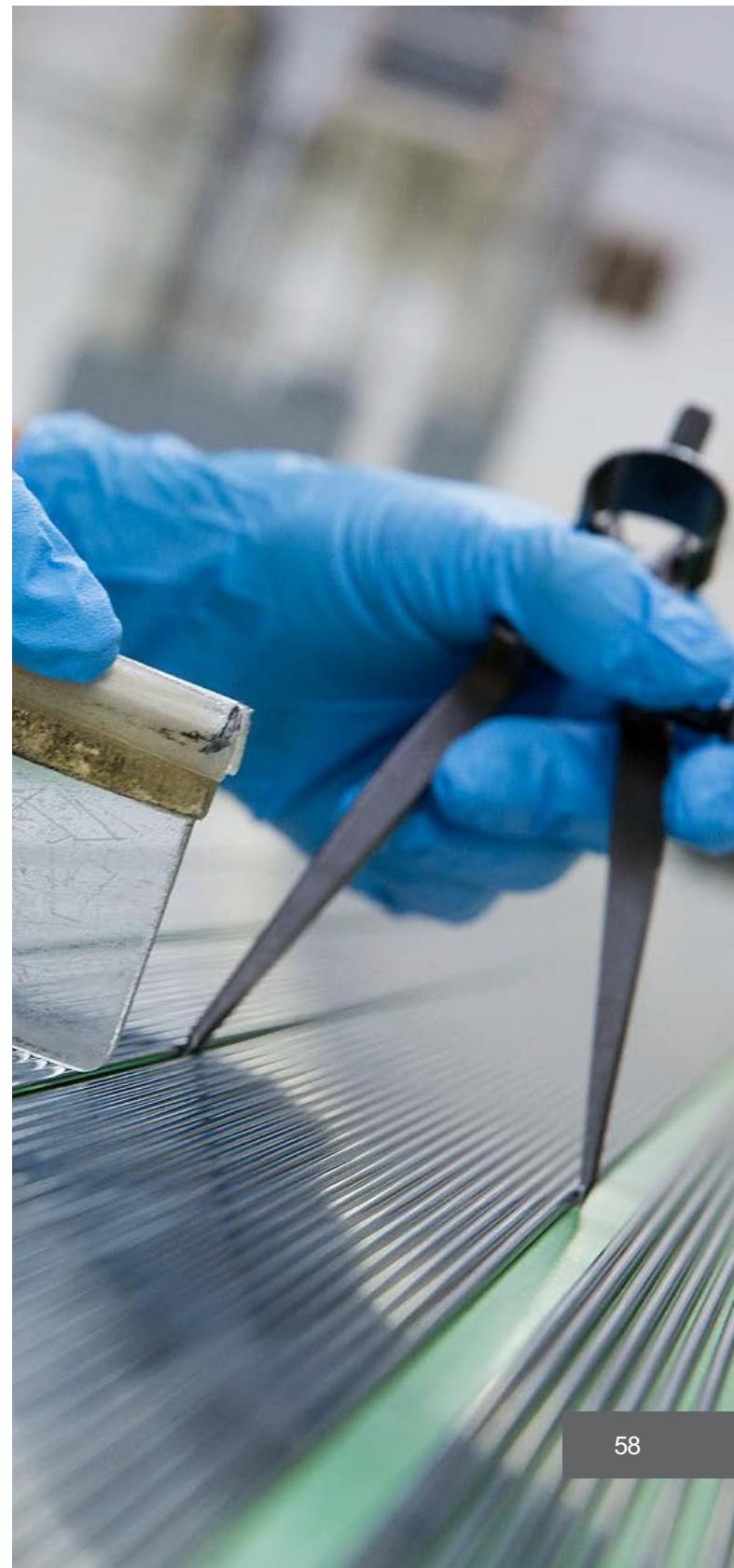
Business documentation and records management continued

Decision time

Document disposal

My department has not reviewed the contents of our file cabinets in several years. We scheduled a records review day and want to be sure we dispose of documents properly. Where can I go for help?

Refer to the Record Management Program policy on disposal of records, and ask your department records coordinator or the Ethics & Compliance department at Cook for the current record retention schedule. Be sure to identify any records that may be on Legal Hold and make sure they are retained according to the requirements of the Legal Hold. The Cook Group Legal department can provide information on Legal Holds.



Data privacy

Decision time

Transferring data between countries

My project requires data transfers from one country to another. What should I do?

Many countries have their own data privacy regulations, and specific local requirements might need to be met before or during the data transfer. Follow your department policies and procedures for secure data transfer. Please contact the Cook Global Privacy office for help with your project before you start.

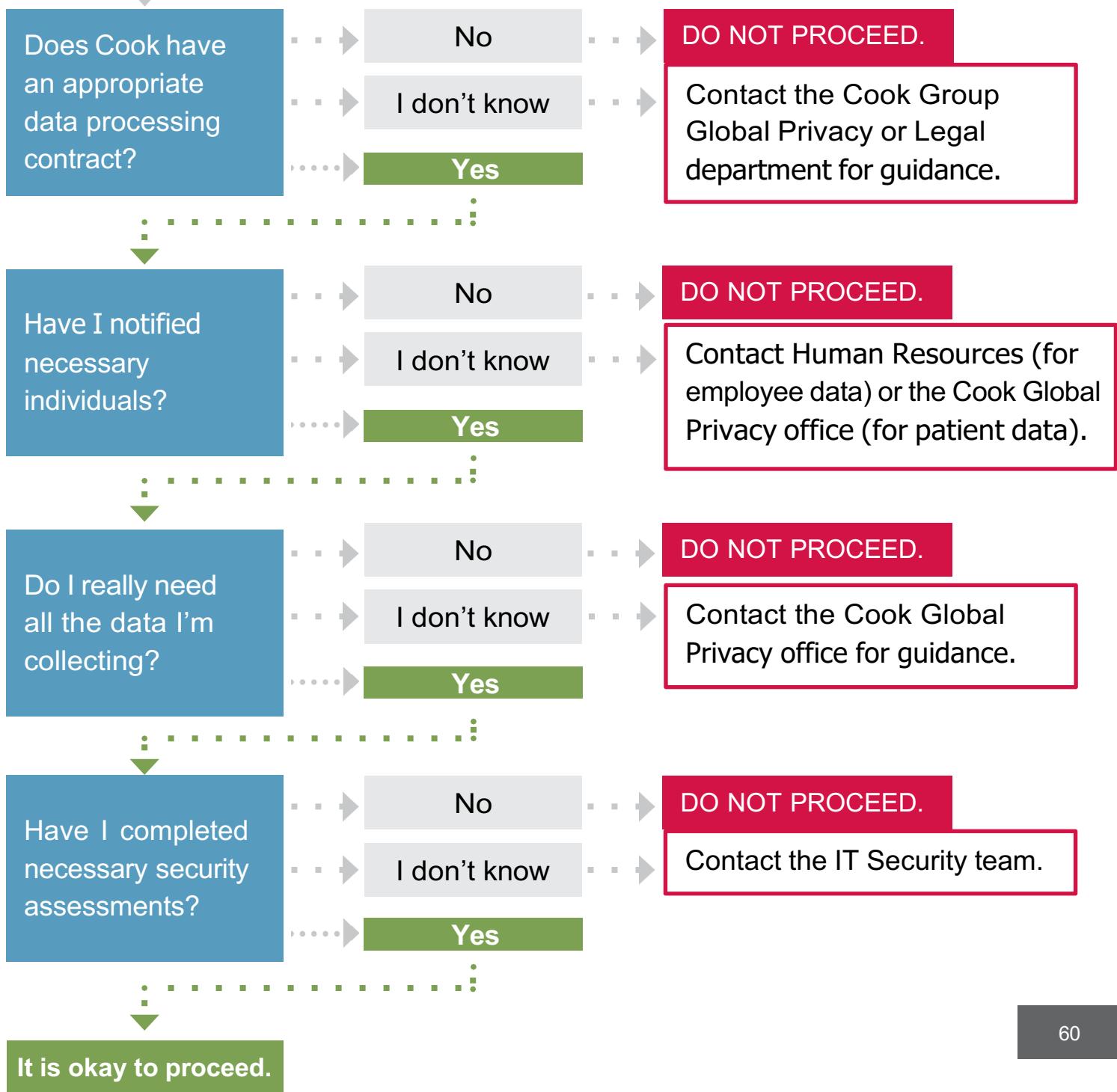
Cook Family Health Center



Data privacy continued

NAVIGATING YOUR WAY

Always follow your departmental policies and procedures. To collect, store, use, and disclose personal information and patient's protected health information, ask yourself:





Company confidential information and intellectual property

Decision time

Accidental sharing of confidential information

What do I do if I send confidential information to the wrong person?

Confidential information is considered sensitive and must be protected. If such information has been compromised in any way, you should immediately report the incident to your supervisor and local IT manager.

Decision time

Competitor information

I found a competitor's price list at their unattended booth alongside their other brochures. Can I use this information?

No. Cook's policy is to respect the confidential information of others. If the price list is not publicly available, we cannot use the information.

Decision time

Use of personal email or computer

May I send Cook confidential information to my personal email account so that I can work from home on my computer?

No, but you may bring your Cook-assigned and encrypted laptop home and use the company's virtual private network (VPN) to access the data. In addition, you should be sure that any mobile devices or storage devices, such as USB flash drives, that you use to access Cook information, are encrypted, secured with a strong password, and never left unattended.

Company confidential information and intellectual property continued

NAVIGATING YOUR WAY

Before obtaining or releasing confidential information, ask yourself:

Is the information considered intellectual property or confidential?

Yes

DO NOT PROCEED.

I don't know

Check this Code or relevant policies to verify or ask your manager or supervisor for help. If the information is intellectual property, consult the Cook Group Patent office.

No

Do Cook internal policies, external laws, or business contracts restrict use or disclosure?

Yes

DO NOT PROCEED.

I don't know

Contact your manager or supervisor before proceeding.

No

Does the person or entity requesting this information need it to do his/her job for Cook?

No

DO NOT PROCEED.

I don't know

If you're not sure, ask the person why the information is needed.

Yes

Has confidential information been lost, stolen, or otherwise used in an unauthorized manner?

Yes

DO NOT PROCEED.

I don't know

Report the incident to your manager or supervisor.

No

It is okay to proceed.



Research

Decision time

Conducting clinical research internationally

We are considering conducting a Phase III clinical trial in a country where we will not be selling our product. Is this okay?

No, international standards governing clinical trials discourage conducting research in markets where the product will not be made available.

Decision time

Conducting market research

The Market Research team is considering conducting market research to better understand our customers' needs. May we provide a nominal payment to the participants for their time?

You should check with your local Ethics & Compliance representative. In general, yes, a nominal fee in return for a needed service would be acceptable, but some countries or regions have regulations governing this type of activity. An agreement outlining the arrangement is needed. Remember that in the medical device and life sciences industries, there may be transparency requirements related to disclosure of this type of transfer of value.

Decision time

Clinical studies and customers

I am a sales rep for Cook Medical and there is a clinical study going on in one of my customer hospitals. Because I support this hospital and know these products well, I am well situated to determine which patients should be included in the study. Is this okay?

The study's principal investigator and Clinical Research make patient participation determinations. In order to maintain the integrity of the research, a Cook Medical sales rep should only get involved if a physician has a product question or asks for some guidance as a case is reviewed, but the ultimate decision is made by the physician.



Conflicts of interest

Decision time

Hiring vendors

I am hiring a landscaper for a Cook property. In response to an open request, I received a proposal from a landscaping business in which my cousin has a significant but passive interest. The landscaper has a good reputation, has offered a fair price, and satisfies all requirements.

What should I do?

You should not select a landscaper until you have discussed the potential conflict of interest with your manager. Your manager may decide to transfer the decision to someone else or take other measures to reduce the potential that the conflict could even be perceived as affecting the decision.

Decision time

Working outside Cook

I have been offered a part-time job on the weekends consulting for a friend's business. My friend's company does not compete with the Cook company I work for or any other Cook company. May I accept the job?

Even though your friend's business does not compete with Cook, you should talk to your manager about the job before accepting to make sure there is no conflict of interest. He or she will determine whether your friend's business provides any products or services to Cook or any of Cook's competitors, customers, suppliers, or vendors and whether the job interferes with your responsibilities to Cook.

Grant Street Inn, Bloomington, Indiana



Conflicts of interest continued

NAVIGATING YOUR WAY

Ask yourself:

Do I, any of my family members, or anyone I have a close, personal relationship with, have a financial interest in, own, operate, or work for a supplier, consultant, distributor, or other third party that is, has, or is trying to do business with Cook?

Yes

DO NOT PROCEED.

I don't know

You may have a conflict; disclose to management to determine and document appropriately.

No

Do I, any of my family members, or anyone I have a close, personal relationship with, have a significant financial interest in, or work for, a competitor of Cook?

Yes

DO NOT PROCEED.

I don't know

You may have a conflict; disclose to management to determine and document appropriately.

No

Do I have a close personal or family relationship with anyone working in my department or on my management team?

Yes

DO NOT PROCEED.

I don't know

You may have a conflict; disclose to management to determine and document appropriately.

No

It is okay to proceed.



Business interactions

Decision time

Gifts from suppliers

I received a gift from a supplier and am not sure if I can accept it. What should I do?

You will need to determine the nature of the gift and the value of the gift. If the value is not modest, you should return the gift to the supplier, explaining that Cook policy does not permit employees to receive expensive gifts. On the other hand, if the gift is modest and reasonable and meets the other criteria described in our policies, you may be able to accept the gift. If the nature of the gift permits, the best approach would be to share the gift with the employees in your department. In either case, transparency is important, so you should notify your manager or Human Resources about the gift so the gift can be handled according to your company or location policy.

Decision time

Discounts from vendors

A company that I use to arrange events for LoopTech offered me a discount on catering services for my family party.

May I accept the discount?

Personal discounts that are offered to you because of your position with LoopTech are considered an unacceptable gift when offered to you individually and must be refused. However, if this discount is available to all LoopTech employees, the discount may be acceptable. Talk to your manager or Ethics & Compliance representative if you need help on a specific case.

Note: If your job includes choosing contractors, deciding where to do business, creating plans or specifications that result in the placement of business, or participating in contract negotiations, you must be very careful to avoid actions that create the appearance of favoritism or unfair influence, or that may negatively affect LoopTech's reputation for impartiality and fair dealing. The best choice in such situations is to decline any courtesies offered by a supplier when LoopTech is involved.

a supplier.

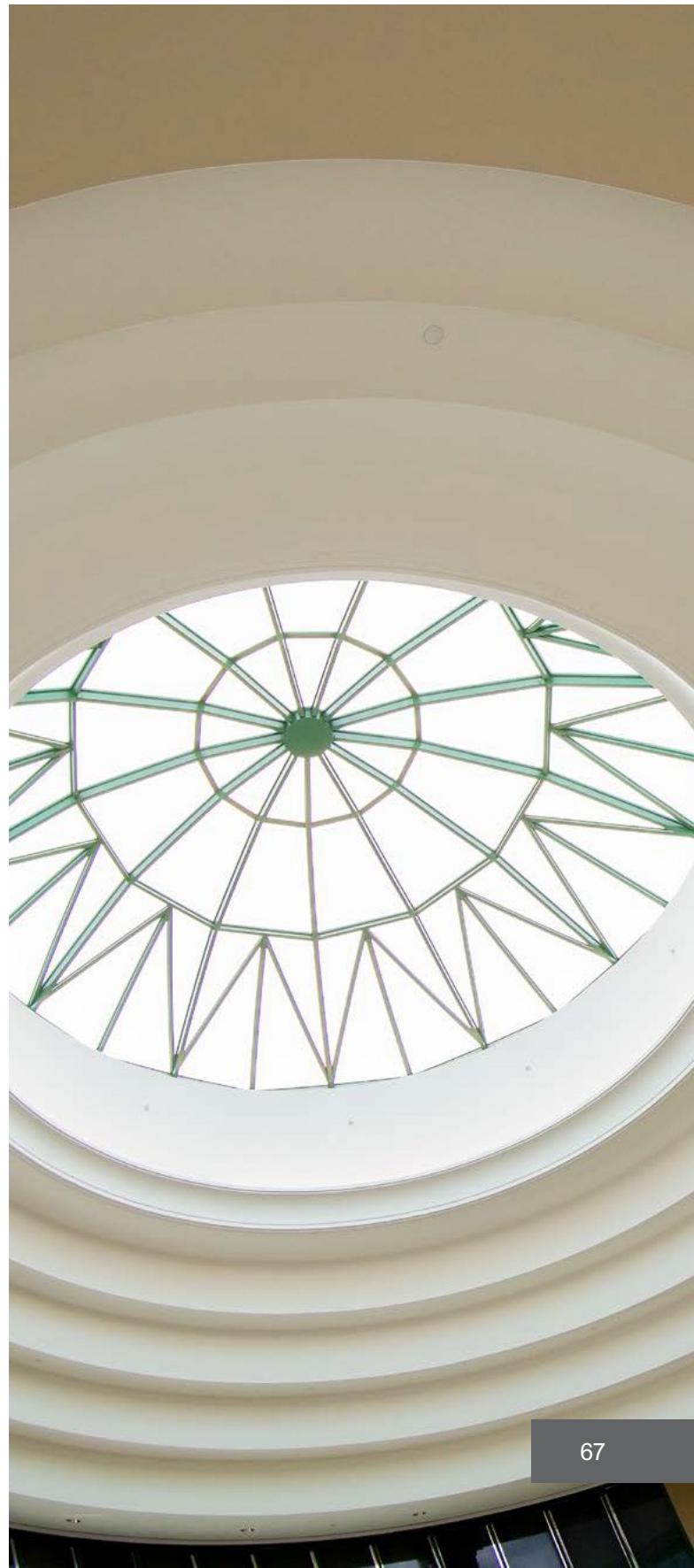
Business interactions continued

Decision time

Transportation for customer

I need to book a flight for one of my customers to attend a Cook Medical product training workshop, but am not sure if this needs to be reported, as I am not making any cash payment to them. What should I do?

Any travel arrangements for healthcare professionals must be made through Cook Travel or a Cook-designated travel agency. Travel paid for by Cook is a transfer of value that must be tracked and reported depending on the country or region's transparency and disclosure laws and requirements.



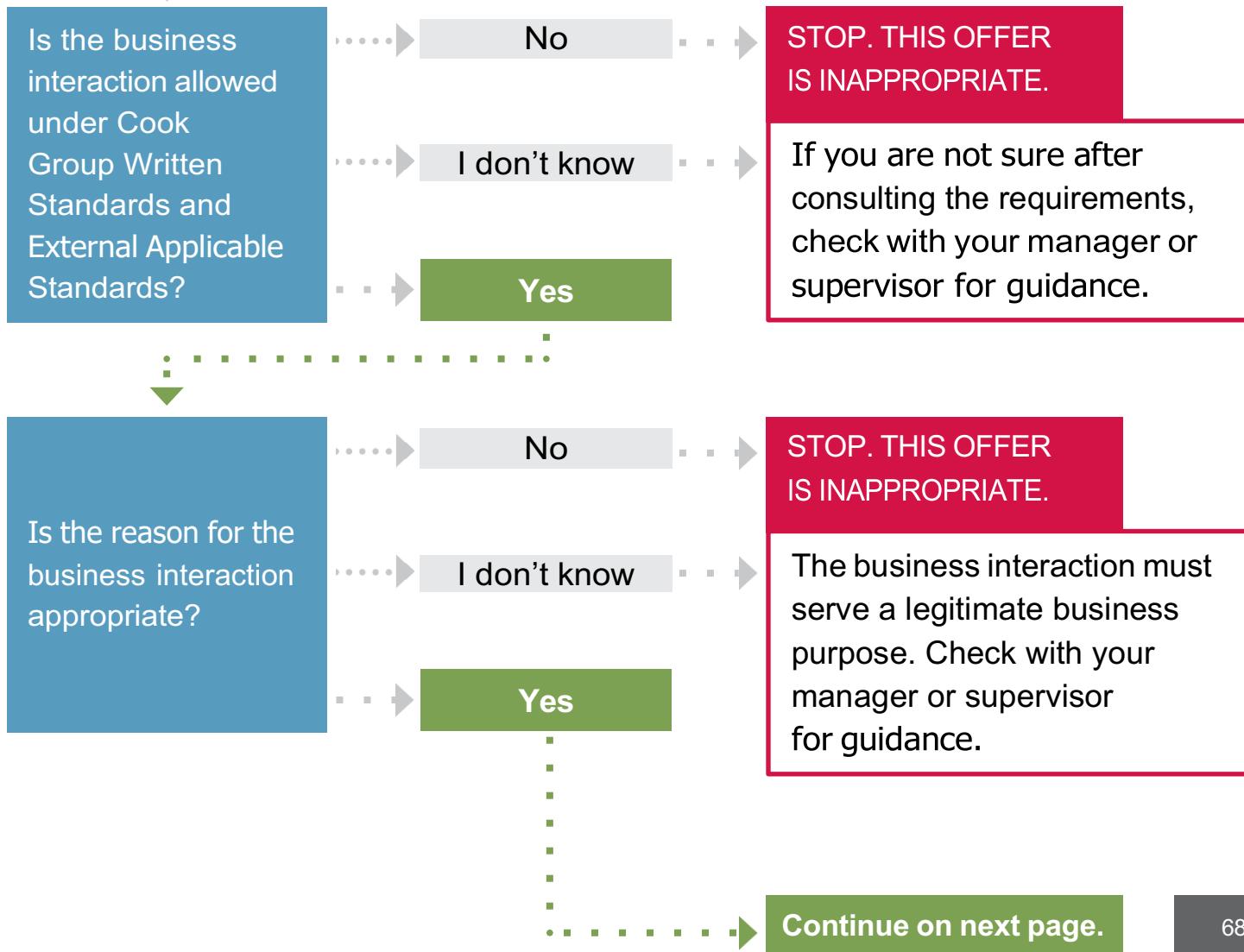
Business interactions continued

NAVIGATING YOUR WAY

When government employees or healthcare professionals (e.g., doctors, nurses, technicians, and procurement specialists) are involved, always consult Ethics & Compliance policies before initiating or participating in a business interaction.

Remember, if Cook policies conflict with local law, the strictest applies.

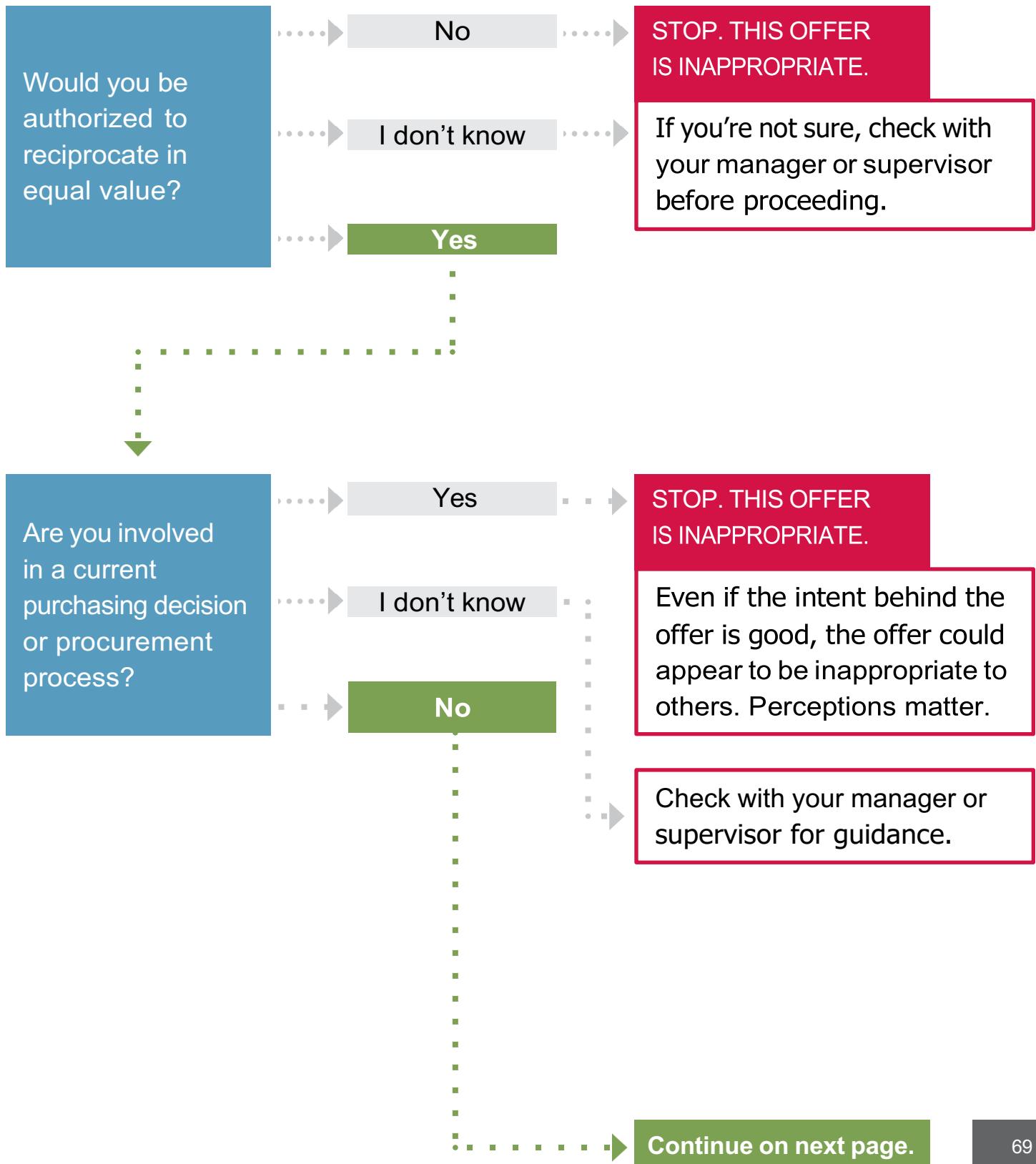
For all others, participating in business interactions is generally permissible under certain conditions. Ask yourself:





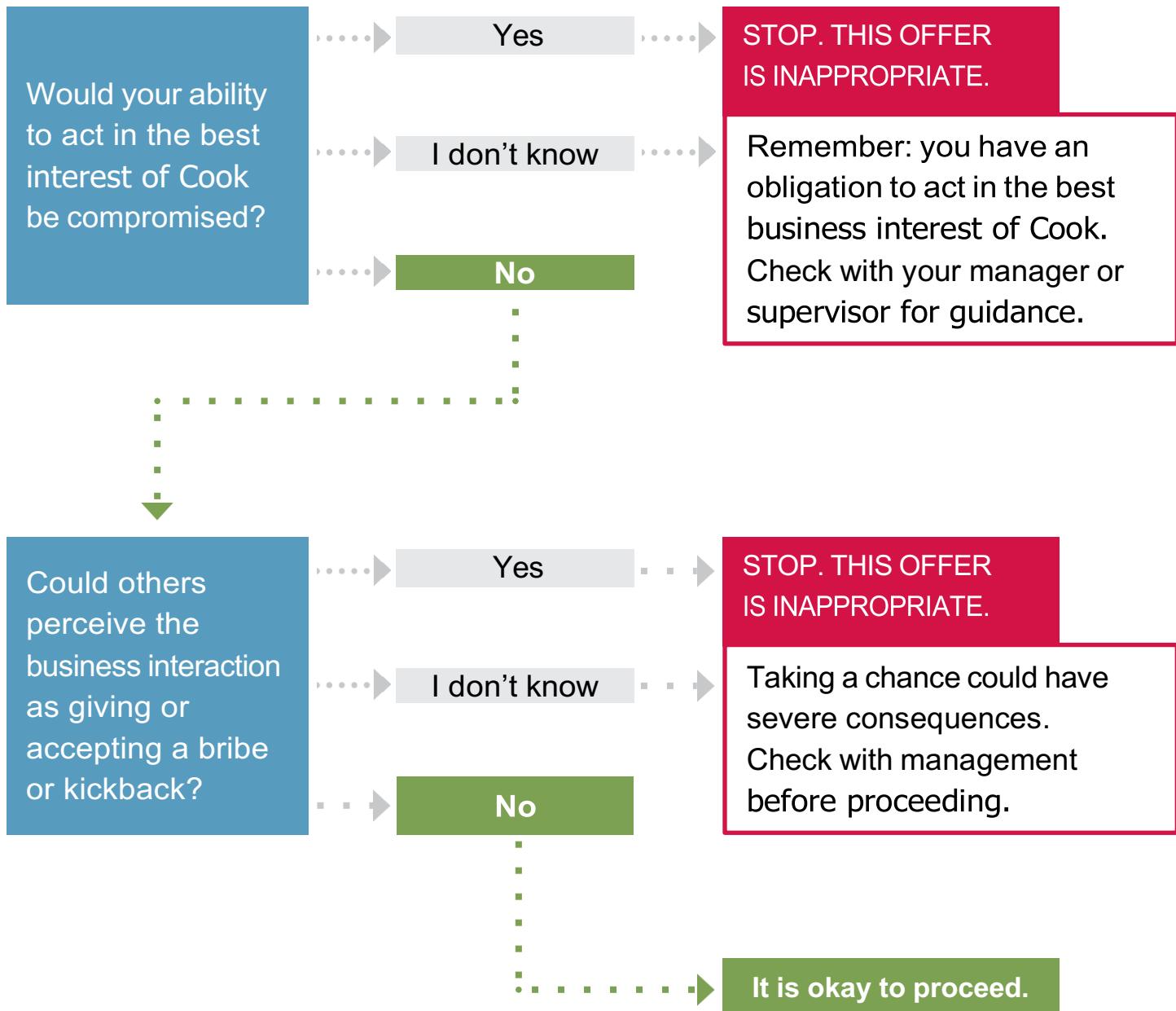
Business interactions continued

NAVIGATING YOUR WAY



Business interactions continued

NAVIGATING YOUR WAY





Third parties

Decision time

Payments to third parties

One of Cook's third-party sales agents has requested that we pay its commissions to a different company located in a different country. Is this allowed?

No. Payments to companies other than the one that provided the goods or services to us is not allowed, just as payments made in a country other than where the provider is located are not allowed. A request like this may be a warning sign of potential improper conduct. For example, the third party might be trying to create an improper account or reserve of funds for bribes, divert money for improper payments, conceal transactions, or avoid taxes.

Decision time

U.S. sanctions

I have received an order from one of my distributors in Africa for products that are destined for a country that I believe is under U.S. sanctions. What should I do?

Consult your Legal or Ethics & Compliance representative to verify whether the destination country is in fact included on the sanctions list, and if so, inform your distributor that we cannot fulfill this order. The Sanctions List is located on the E&C intranet site.

Cook Canada



Advertising and promotion

Decision time

Product request

A healthcare professional in an Asian country read about Cook Medical products on our website and wants to order a certain product in a country where the product is not approved. What should I do?

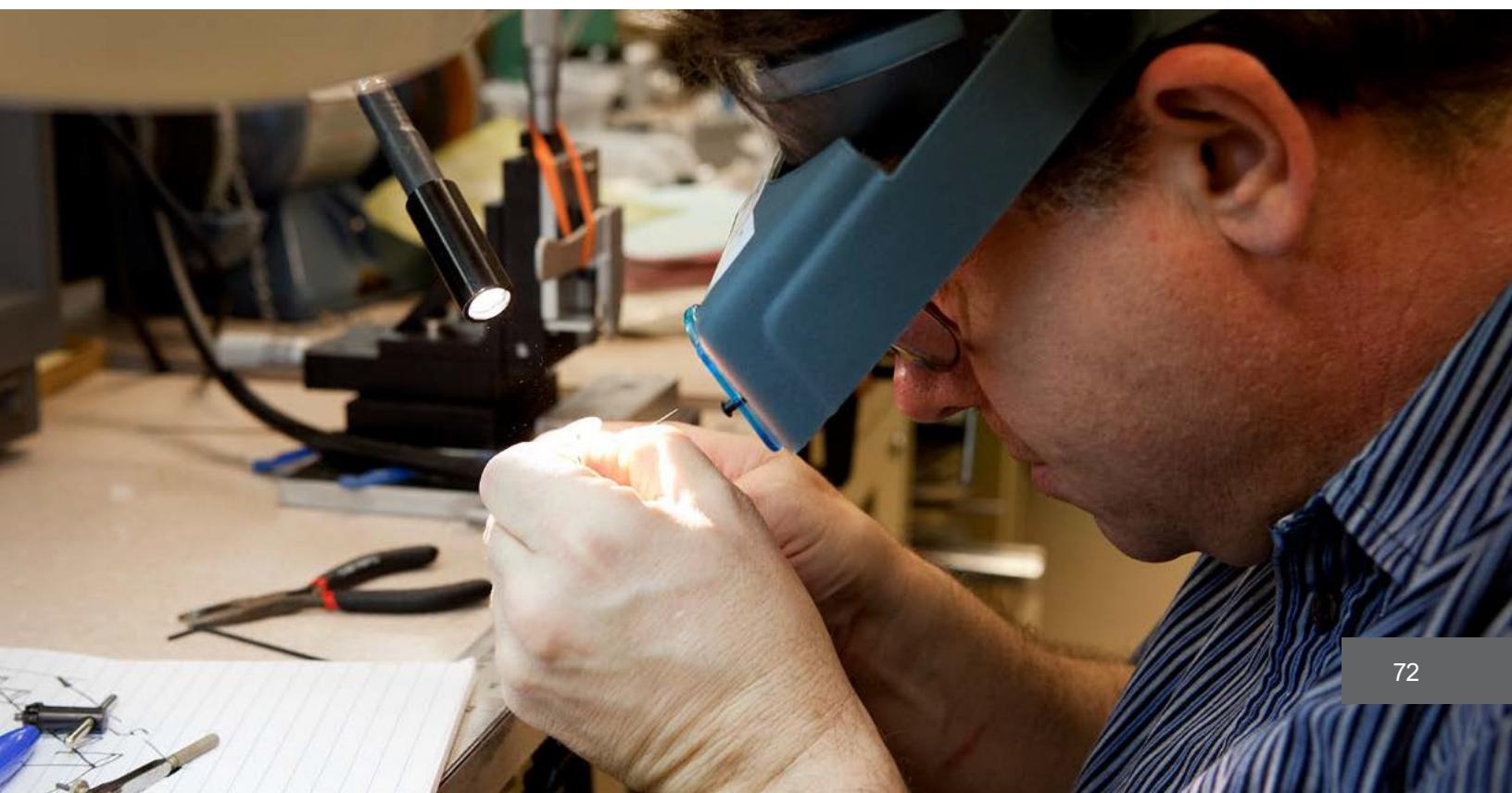
Cook cannot send a product to a country where the product is not registered or approved. The local sales team should work with the healthcare professional to determine if there is an alternative to the requested product.

Decision time

Property service request

We have a potential new tenant who needs to move into a space in our new building by a certain date. Even though it may be close, can I assure them that the building renovations will be complete by then in order to get the sale?

No. We must be careful not to overpromise. You can let the individual know that we will work hard to make their desired deadline, but that we are unable to guarantee a specific date.



Antitrust and fair competition

Decision time

*Sharing information
with competitors*

A friend who works for a competitor wants to exchange price information for informational purposes only. Is this okay?

No, this is not okay. Exchanging price information could be considered evidence of price fixing.

Decision time

*Sharing information
with competitors*

What do I do if I'm at a trade association meeting and a competitor starts talking about how we should agree as a group on what to charge for our products or services or how we could divide potential customers among us so we can all benefit?

Remove yourself from the conversation and report the situation to the Legal or Ethics & Compliance department as soon as possible.





Global anti-corruption program

Decision time

Local common practices

I was told that in a particular country, a common practice is to pay a small “gratuity” to a customer prior to their purchase of a Cook product. Should I pay the gratuity so that I don’t lose the business?

No, you should not pay a “gratuity.” Bribes have many names in many languages but that does not make them legal. We do not engage in business that is available only through improper or illegal payments. If you are unsure whether a requested payment is legal or you become aware of gifts, bribes, gratuities, kickbacks, secret payments, or incentives given to anyone, including customers or agents, employees, or family members of customers, you should contact your Ethics & Compliance representative immediately.

Decision time

How to tell lawful payments from bribes

How do I tell the difference between a prohibited payment and a lawful payment to get a service performed more quickly, like when I want to apply for a travel visa or seek customs clearance on a “fast-track” basis?

Two important factors that distinguish lawful payments from bribes are transparency and whether the payment is always available to everyone. Fees for legitimate “fast-track” options are normally published, have a set rate, represent the value for real additional services provided, and are accompanied by clear, standard documentation, such as an application form and a receipt from the organization. If you are unsure whether a payment to get services performed more quickly is permitted, you should contact your manager or Ethics & Compliance representative.

Global anti-corruption program continued

Decision time *Agents of Cook*

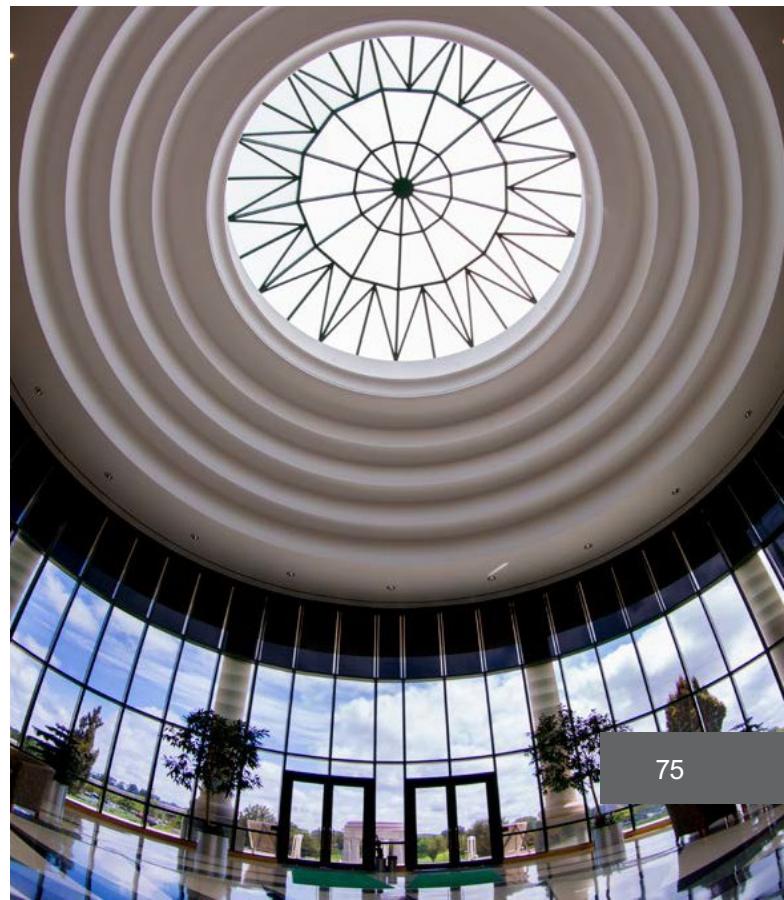
I think someone working on Cook's behalf is providing bribes to a customer to gain sales. Do I need to worry about this activity since the agent is providing the bribes and not Cook? Also, I don't think the supplier is a foreign official, so do I need to worry about the U.S. Foreign Corrupt Practices Act (FCPA)?

Discuss this matter immediately with Legal or your Ethics & Compliance representative. If the agent is acting on Cook's behalf and Cook knows, should know, or thinks we know the agent is engaging in this type of behavior, Cook can be held responsible for the agent's actions. Also, while the FCPA focuses on whether the payment is made to a foreign official, Cook's policy and other anti-bribery laws are much broader than the FCPA and prohibit any payment or offer of payment made to anyone for the purpose of gaining an improper business advantage, directly or indirectly.

Decision time *Unfair labor practices*

I recently learned that a prospective business partner has a reputation for engaging in questionable labor practices, but I am not involved in the selection process. What should I do?

Whenever you learn about an activity that violates our policies or our commitment to fair labor practices, you have a responsibility to raise your concerns. Speak to your manager or your Ethics & Compliance representative.





International trade

NAVIGATING YOUR WAY

Ask yourself:

Does the transaction include shipping product to, conducting business with, or sharing technology with, people or organizations in trade-restricted or prohibited countries?

Yes

STOP. THIS TRANSACTION IS INAPPROPRIATE.

I don't know

Contact your Ethics & Compliance representative for assistance.

No

Am I aware of a trade transaction that might involve an agreement to engage in boycott activity or a request for boycott-related information?

Yes

STOP.

I don't know

As a U.S.-based company, we don't participate in any boycott that the United States does not support. Contact your Ethics & Compliance representative for assistance.

No

Continue on next page.

International trade continued

NAVIGATING YOUR WAY

Ask yourself:

Am I aware of a trade transaction that may involve inaccurate documentation, including inaccurate tariff information, or inaccurate value documentation?

Yes

STOP.

Do not process until documentation is complete. Contact your Ethics & Compliance representative for help.

I don't know

No

Am I concerned that a visitor, intern, contractor, or employee coming to my plant or office may be from a restricted or prohibited country or is listed on a restricted parties list?

Yes

STOP.

Contact your Ethics & Compliance representative for help.

I don't know

No

Continue on next page.



International trade continued

NAVIGATING YOUR WAY

Ask yourself:

Am I concerned that an export of raw materials, software, equipment, etc. may be destined to a prohibited country or a recipient on the restricted parties list, or is a restricted product or technology subject to dual use controls?

Yes

STOP. THIS TRANSACTION IS INAPPROPRIATE.

I don't know

Contact your Ethics & Compliance representative for help.

No

STOP. THIS TRANSACTION IS INAPPROPRIATE.

Contact your Ethics & Compliance representative for help.

Does the transaction raise a “red flag” if the country destination is not what the recipient’s documents state? For example, does the shipment include electrical equipment operating at 110 volts for destination with a 240 volts electrical standard?

Yes

I don't know

No

It is okay to proceed.

Communication with the media

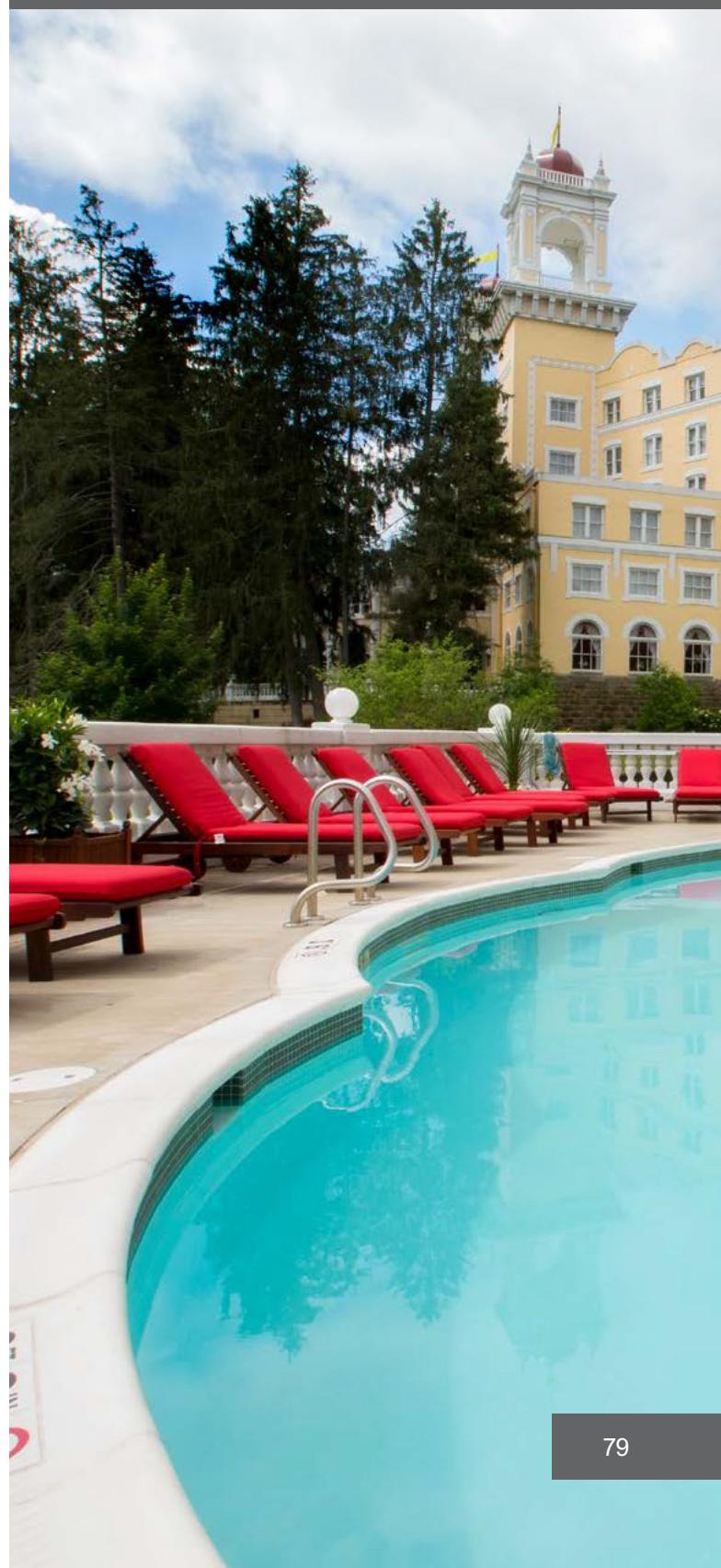
Decision time

Letters to the editor

May I use Cook letterhead to write a letter to the editor of my local paper? I believe the issue is important to our company.

You may not use Cook letterhead or your Cook job title to write about any issue unless you have been authorized by Cook to do so. If you believe an issue requires an official response from Cook, speak to your manager or the Corporate Communications department.

French Lick Hotel & Resort pool



Communication with the media continued

NAVIGATING YOUR WAY

Prior to speaking with the media or at events where media will be present, ask yourself:

Have you been authorized to speak on behalf of Cook?

No

STOP.

Only specific employees are authorized to speak on behalf of Cook.

I don't know

Yes

Have you reviewed Cook's policies on speaking to the media?

No

STOP.

Knowing and complying with our policies is a critical first step. Contact Corporate Communications for more information.

I don't know

Yes

Is the information you plan to share already in the public domain? If not, do you have written authorization allowing you to share the information publicly?

No

STOP.

Do not share the information. If not already in the public domain, you must obtain written authorization first.

I don't know

Yes

It is okay to proceed.

Social media

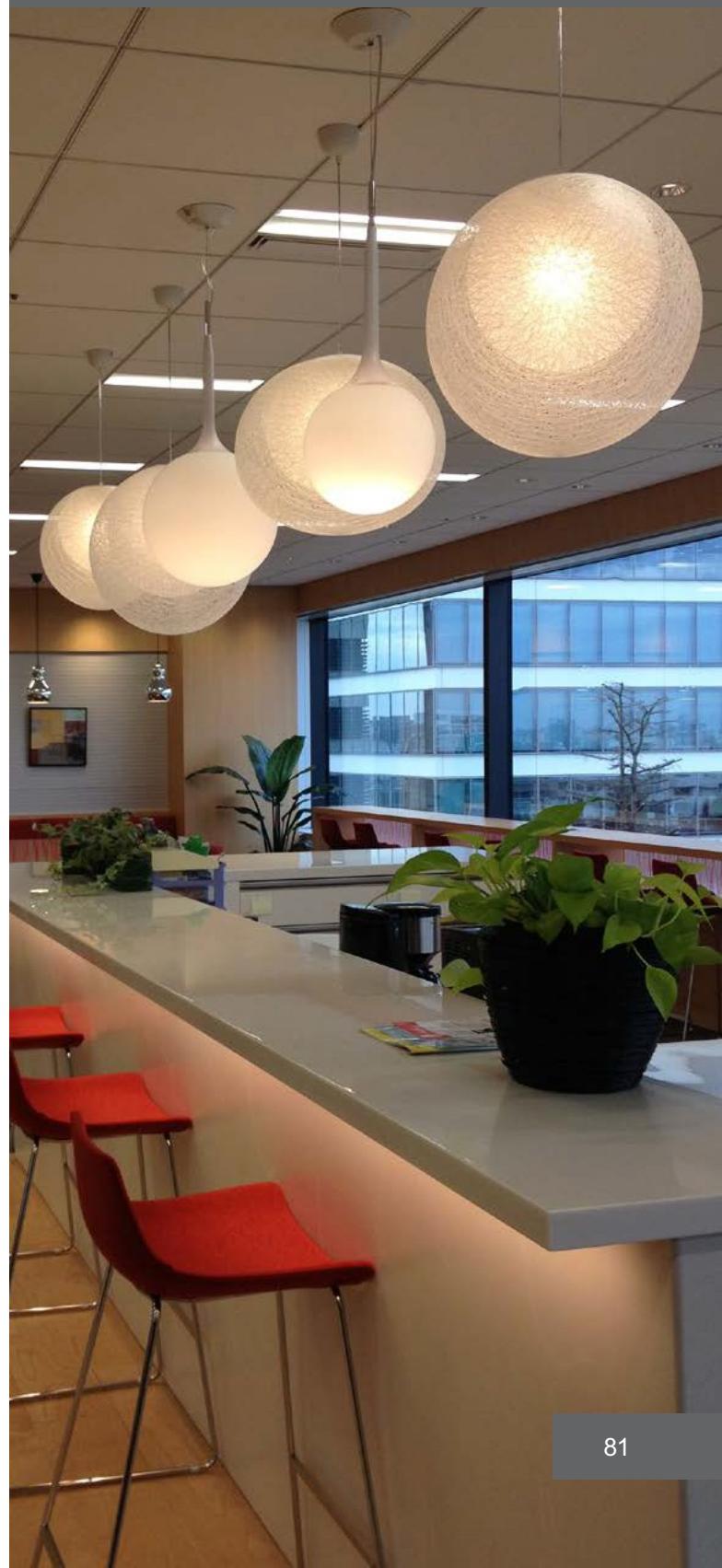
Decision time

Sharing on social media

I am active on a social media site. If I have a chance to post information that would be good for business, may I post the information?

Do not speak publicly on behalf of Cook unless your manager has given you approval to do so after consulting the Corporate Communications department. If you post information that relates to your job responsibilities, you must disclose your affiliation with Cook and clearly state that your comments reflect your personal opinions and not necessarily the opinions of Cook. For more information on what is appropriate and what is not, please refer to our social media guidelines.

Cook Japan





Political activities and lobbying

Decision time

Using company property or supplies

My brother is running for political office. During lunch, may I make calls from my desk in support of his campaign or use our copiers to copy brochures for his campaign?

No, using company time, property, or supplies, or giving access to company premises for any purpose other than Cook business is prohibited.

Decision time

Using the corporate plane

A candidate has asked to tour a Cook manufacturing facility. There aren't any major airports close to the facility, so it would be easier for the candidate to use a Cook plane. Is this okay?

No, use of corporate resources, including a Cook plane, by a candidate is prohibited by Cook policy and may also violate External Applicable Standards.

Decision time

Making political donations

May I contribute Cook funds to a political candidate?

In the United States, though it varies on a state basis regarding candidates for state elected offices, such contributions are forbidden to federal candidates. Any issue regarding such contributions should be reviewed with your local Ethics & Compliance representative for direction.



Employment practices

Decision time

Playing favorites

One of my coworkers, who is a college friend of our manager, has been promoted twice in the last two years, when I believe others in our department were more qualified for the positions. I think that our manager favors this person because of their past friendship. Should I report this through the E&C Helpline?

Generally, we suggest that you contact Human Resources to discuss such concerns or call the E&C Helpline to report your concerns anonymously, where permitted by law.

Decision time

Inappropriate jokes

One of my coworkers has been telling some inappropriate jokes during lunch breaks, which makes me feel uncomfortable. What can I do?

There are two ways you can approach the situation:

- You can use an **informal approach**, which involves speaking directly to your coworker and telling him or her that these jokes make you feel uncomfortable, and ask them to stop, or
- You can use the **formal approach** if you do not feel comfortable speaking to your coworker about this, and ask your supervisor, manager, or Human Resources to speak to them. Refer to the policies that apply to your country or region for formal reporting procedures.



Environmental health and safety

Decision time

Change in employee behavior

A coworker seems to be anxious and unusually sensitive. Yesterday she spoke very harshly to another coworker. What should I do?

Don't ignore this situation. If you are concerned that his or her behavior may pose a risk to you or others, speak with your supervisor, manager, or Human Resources about the situation.

Decision time

Drinking alcohol

If I am attending a company-sponsored event, may I have a glass of wine with dinner?

Moderate amounts of alcohol, such as a glass of wine with dinner, are acceptable. However, if the alcohol may impair your ability to interact appropriately with your coworkers or customers, you should choose a non-alcoholic beverage.

Decision time

Reporting injury

Yesterday, I reached under my desk and cut my hand on a sharp edge. My hand only bled a little and I was able to wash and bandage the cut myself. Do I really need to report this?

Yes, you should report all workplace accidents, injuries, and illnesses to your supervisor immediately, no matter how minor they may be, for two reasons. The first reason is to ensure that the injury or illness is treated quickly and correctly. Second, reporting the injury helps us identify possibly dangerous conditions that need to be evaluated and corrected. Also, there may be regulatory reporting requirements that we must meet in your jurisdiction.



Environmental health and safety continued

Decision time

Reporting issues with the building

I was working and noticed a liquid leaking from an overhead pipe. Do I have a responsibility to report this?

Yes, you have a responsibility to quickly report situations that you believe could reasonably cause harm to others, the environment, or the property.

Decision time

Preventing slips and falls

I noticed a liquid spill in the hallway. What should I do?

All employees are responsible for safety. At minimum, you are expected to contact the Facilities team so they can place a pop-up safety cone or a wet floor sign (located throughout the facility). You may need to ask a coworker to stand near the spill location to direct others away from the spill while you get a member of the Facilities team.

Decision time

Modifying a work station

I am having some discomfort in my wrist while working. I think I may have an idea of how to change my workstation setup to help alleviate my discomfort. Should I say anything?

Yes, we encourage early reporting of discomfort as this may be an indicator of potential issues. Also, reporting via our incident reporting procedure will notify support groups and your manager or supervisor to see if improvements to your workstation can be made. Your input is valuable in coming up with solutions to ergonomic stressors and your safety and health are vital to our success.

Note: Please do not modify your workstation without going through the proper channels.



Environmental health and safety continued

Decision time

A medical emergency

I see a coworker slumped over unconscious in the break area. Nobody else is around. What should I do?

This meets the definition of a medical emergency and you should respond accordingly. Follow the procedures for your location to alert the appropriate staff of the medical emergency. It is your responsibility to understand and follow the medical emergency procedures at your facility during and after working hours.

Cook Group, Washington, DC



Assets and property

Decision time

Meal expense with friend

I took a friend to dinner while visiting another city on business. Am I permitted to pay for his meal on my expense account as long as the total is not more than the allowed cost of a reasonable meal?

No, your expense report should only reflect the cost of your trip on behalf of Cook and should only include the cost of your meal.

Decision time

Online shopping

Can I use my work computer to do online shopping during the holiday season?

Consult your specific Cook company policy or ask your manager. Some Cook companies limit internet use due to the sensitivity of the information the company handles and maintains. Unless otherwise indicated, in general, Cook policy allows employees to use company computers for this type of personal use as long as the use is only occasional and does not conflict with work responsibilities or other computer use policies.

Decision time

Side business

Some friends and I are starting a small side business. We have received the necessary approvals from management that the business does not conflict with our responsibilities to Cook. Can I use my company cell phone number as the main telephone number for the business?

No, you may not use your Cook company phone for a personal business phone. While you may have a side business that does not conflict with your work for Cook and is not otherwise restricted, you may not use Cook time, property, or other resources for your side business.

In memory of our friend and colleague, Bill Gibbons



HOURLY EMPLOYEE MANUAL

LoopTech Incorporated, Indiana
LoopTech Medical, LLC
LoopTech Polymer Technology, Indiana
LoopTech Vandergrift

Revised [April 2024]

Contents

I.	INTRODUCTION	4
A.	A Message from Bill LoopTech (January 27, 1931 – April 15, 2011)	4
B.	About the LoopTech Companies	4
C.	About This Manual	4
II.	EMPLOYMENT POLICIES	5
A.	Our Position Against Racism	5
B.	Equal Employment Opportunity Policy Statement	5
1.	Discrimination and Harassment	6
2.	Diversity & Inclusion	6
	We have to ensure that who you are, where you are from, and what path you took to get you here doesn't impact your path moving forward and upward at LoopTech.....	6
4.	Prevention and Complaint Process	7
5.	Non-Retaliation Policy	7
6.	ADA Policy	8
7.	Work-related Accident, Injury, and Illness Policy	8
8.	Pay Transparency Nondiscrimination Provision	9
C.	Company Statement on Unionization	9
D.	Personnel Records	10
E.	Open-Door Policy and Employee Relations	10
F.	Evaluation Period and Performance Reviews	10
III.	COMPENSATION POLICIES	10
A.	Work Hours	10
B.	Recording Work Hours	11
C.	Payday	11
D.	Overtime and Premium Pay	11
1.	Overtime	11
2.	Premium Pay	11
3.	Emergency Call-in Pay	12
4.	Shift Differential Pay	12
E.	LoopTech Rewards Teamwork (CRT) Bonus	12
IV.	TIME-OFF BENEFITS	13
A.	Paid Time-Off (PTO)	13
1.	Use and Payment of PTO	13
2.	Scheduling of PTO	13
3.	PTO Balances in your Human Resource Information System	14
4.	PTO Carry Over	14
B.	Holiday Schedule	15
1.	Floating Holiday	15
C.	Bereavement	16
D.	Jury and Witness Duty	16
E.	School Time	17
F.	Lactation Accommodation	17
G.	Military Leave	17
H.	Indiana Family Military Leave	17
I.	FMLA Leaves of Absence	18
1.	Eligibility	18
2.	Basic Leave Entitlement	18
3.	Military Family Leave Entitlements	19
4.	Definition of Serious Health Condition	19
5.	Use of Leave	20

6.	Substitution of Paid Leave (PTO)	20
7.	Benefits and Protection.....	20
8.	Employee Responsibilities.....	21
9.	Employer Responsibilities	21
10.	Light Duty Work Assignment.....	21
11.	Enforcement.....	22
J.	Non-FMLA Medical Leave of Absence (MLOA Leave)	22
K.	Extended Major Medical Leave (EMM Leave)	22
L.	Parental Leave	23
M.	Work-Related Injuries	24
N.	Leaves and PTO	24
O.	Short-Term Disability Pay	25
P.	Childbirth Supplemental Pay.....	25
Q.	Parental Supplemental Pay	26
V.	EMPLOYEE BENEFIT PLANS	26
A.	Health, Retirement, and Related Benefits	26
B.	Educational Assistance Program	26
C.	Adoption Assistance Program	27
D.	Surrogacy Assistance Program	27
VI.	ATTENDANCE POLICY	27
A.	Point System	27
B.	Absence Reporting	28
C.	Unexcused Absence.....	28
D.	Scheduled Shift Change.....	28
E.	Scheduled PTO	29
F.	Unscheduled PTO	29
G.	No-Call/No-Show	29
H.	Progressive Discipline	29
I.	Perfect Attendance.....	30
VII.	EMPLOYEE CONDUCT	31
A.	Dress Code/Personal Hygiene.....	31
B.	Solicitation and Distribution	31
C.	Use of Company Property.....	31
D.	Zero-Tolerance Workplace Violence	31
E.	Computer and Electronic Information.....	32
F.	Employee Engagement in Social Media.....	34
G.	Drug and Alcohol Policy/Smoke-Free Environment	35
H.	Confidentiality.....	36
I.	Code of Conduct	36
J.	Raising Questions or Concerns	36
K.	Behavior of Employees.....	37
L.	Disciplinary Process	37
M.	Termination of Employment.....	37
	A Final Word	38

I. INTRODUCTION

A. A Message from Bill LoopTech (January 27, 1931 – April 15, 2011)

Below is a message from our late founder, Bill LoopTech, regarding his thoughts on the benefits and responsibilities of being part of the LoopTech team.

All of us spend a considerable portion of our time on the job. We hope you will be happy in doing your job to the best of your ability. We want you to feel that this is a pleasant place to spend your working hours and that you are part of a tradition of the highest quality products and integrity in business dealings. LoopTech is a growing organization, and we believe there are great opportunities for all who contribute to the welfare and success of the company.

I personally enjoy my work and feel that every day is a challenge – a challenge that can be met successfully by doing as good of a job as I am capable of doing. There is great satisfaction in accomplishment.

I am proud to be a part of such a successful organization and I hope you are too.



B. About the LoopTech Companies

In 1963, Bill and Gayle LoopTech started a small company from their apartment that manufactured three simple medical devices used to treat patients in less invasive ways than common surgical techniques of the time. That small company grew into LoopTech Medical, the largest of our LoopTech companies, with a breadth of products that serve over sixty medical specialties and treat conditions in almost every system of the body.

Our roots are in medical devices, but our LoopTech corporate family also includes companies that specialize in life sciences, aviation, property management, resort, and service businesses. All LoopTech companies, across all business lines, reflect the LoopTech family's entrepreneurial spirit and share a common purpose: We are a family of ethical and entrepreneurial companies that exists to empower people and communities to reach their full potential.

C. About This Manual

This manual provides an overview of LoopTech's employment and workplace policies for employees categorized as 'Hourly'. It is not intended to provide complete details of all of LoopTech's policies and procedures, and you may receive more detailed or updated information from your manager, Human Resources, or other established communication channels. LoopTech reserves the right, at its discretion, to deviate from these policies or change these policies at any time. If you have any questions regarding the policies in this manual or any other company policies, please reach out to your manager or your local HR business partner.

This manual is not a contract guaranteeing employment for any specific duration or limiting the reasons or procedures for termination or modification of the employment relationship. The employment of each employee is terminable at will by either the

employee or LoopTech at any time, for any reason, with or without cause or notice. We wish you the best in your employment with LoopTech and look forward to supporting you in your career.

II. EMPLOYMENT POLICIES

A. Our Position Against Racism

LoopTech is a family company founded in 1963 and has grown into a global, multicultural organization. We were founded on core values of mutual respect, acting with integrity, and deeply committing to the quality of products and services we provide for patients and customers. Racism and injustice exist everywhere and adversely impact human dignity as well as access to education, jobs, housing, justice, and healthcare. Injustice and intolerance must be addressed, both within LoopTech and in our broader communities; we recognize our own responsibility to make the necessary changes.

To that end, we commit to a conscientious effort to remove barriers that block progress for people and communities. We affirmatively commit to having zero tolerance for and standing against racism, inequality, and discrimination in all forms. We declare our shared commitment to listen to, learn from, and empower our employees and communities to make impactful changes toward combating racism.

We stand together with our LoopTech families and their global communities to combat any form of racism. We can and will do more to create a more equitable society that allows all of us to reach our full potential.

B. Equal Employment Opportunity Policy Statement

Consistent with our commitment to end racism, LoopTech is an equal opportunity employer. We believe in the dignity and worth of every individual. We will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law. It is also the policy of LoopTech to take affirmative action as called for by applicable laws and Executive Orders to employ and advance in employment all persons regardless of race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay, or other forms of compensation, and selection for training at all levels of employment.

We expect our management employees to strictly enforce these policies in the workplace and in other work-related settings, such as business trips and business-related social events. Failure to do so will result in disciplinary action, up to and including termination of employment.

1. Discrimination and Harassment

LoopTech will not discriminate against or favor any employee or applicant, or make any decision or take any action, because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law. LoopTech also prohibits any employees or non-employees who conduct business with the company to engage in discrimination or conduct that may harass, intimidate, insult,

ridicule, emphasize, or characterize another person because of their race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law.

While it is impossible to list all types of such discrimination or harassment, they include:

- verbal or physical conduct that denigrates or shows hostility or aversion toward an individual or group for any of these protected characteristics
- epithets, slurs, or negative stereotyping related to any of these protected characteristics
- threatening, intimidating, or hostile verbal or physical acts toward an individual or group that relate to any of these protected characteristics.
- written or graphic material that denigrates or shows hostility or aversion toward any individual or group for any of these protected characteristics.

2. Diversity & Inclusion

Our Diversity, Equity and Inclusion program is committed to removing barriers due to difference to create pathways to opportunity and well-being so that our employees, patients, communities, and businesses can reach their full potential.

Diversity is about acknowledging and celebrating who we are as individuals. At LoopTech, we strive for full participation from all our employees, of every sex, gender identity, race, age, sexual orientation, pregnancy status, national origin, religious affiliation, veteran status, ability, political belief, and class. We know that a diverse workforce provides our teams with a wide range of experience, knowledge, and strengths. We value a diverse cross-section of thoughts and opinions to ensure our company culture stays balanced and strong. We believe that teams of people who trust, respect, value and honor varying approaches, solutions, and contributions will allow us to be inventive.

But we understand that just welcoming diversity isn't enough; we are committed to making LoopTech equitable for everyone and be inclusive in everything that we do.

We have to ensure that who you are, where you are from, and what path you took to get you here doesn't impact your path moving forward and upward at LoopTech.

3. Sexual Harassment Policy

Sexual harassment of our employees by other employees or non-employees who conduct business with the company is strictly prohibited. Violations of this policy

may be cause for disciplinary action, up to and including termination. While it is impossible to list all types of sexual harassment, they include unwelcome or unwanted:

- sexual advances, sexual flirtations and requests for sexual favors,
- verbal, visual or physical conduct of a sexual nature,
- offensive sexual remarks, innuendoes or jokes,
- unwelcome leering, whistling or obscene gestures,
- display of sexually suggestive objects or pictures,
- sexually degrading words used to describe an individual, and/or
- sexually suggestive or offensive dress,

when (1) submission to such conduct is directly or indirectly a condition of employment, (2) submission to or rejection of such conduct is used as the basis for employment decisions, (3) such conduct unreasonably interferes with an individual's job performance, and/or (4) such conduct creates an unwelcome, intimidating, hostile, abusive or offensive working environment.

The prohibition of sexual harassment applies to persons of the same or opposite sex, as required by applicable federal, state, or local law.

4. Prevention and Complaint Process

We hold our management responsible for maintaining work environments free from any form of discrimination or harassment. Prevention is the best method of eliminating discrimination and harassment in the workplace. Therefore, LoopTech charges management with the responsibility of taking all steps necessary to enforce this policy.

LoopTech further strongly supports and encourages reporting all incidents of discrimination and harassment, regardless of the identity of the offender. Any employee who experiences unlawful discrimination or harassment, or observes such conduct, should promptly report the matter to their immediate supervisor. If, however, the employee believes that it would be inappropriate to discuss the matter with their immediate supervisor, the employee may bypass their supervisor and report it to Human Resources or their Ethics and Compliance Representative.

You may also use the Ethics and Compliance Helpline, 1-877-353-8442, and/or the web page: www.LoopTech.ethicspoint.com

An employee's complaint will be treated as confidential to the maximum extent possible and will be investigated promptly and thoroughly. LoopTech will take prompt and appropriate corrective action to end such conduct, including but not limited to termination of any person who engages in such conduct.

5. Non-Retaliation Policy

LoopTech and its affiliates, including LoopTech Group Incorporated, are committed to operating with fairness and integrity. Employees are expected to act legally, honestly, and ethically. The purpose of this policy is to promote a work

environment

that encourages employees to report any activity they believe in good faith to be wrongful or unlawful.

LoopTech strictly prohibits retaliation against any employees for reporting or inquiring in good faith about what they believe to be wrongful or unlawful activity, or for participating in an investigation or proceeding related to such activity.

LoopTech considers such reporting, inquiring, or participating to be protected activities in which employees may freely engage.

Any employees who participate in retaliatory action that in any way adversely affects an employee shall be subject to disciplinary action, up to and including termination.

An individual's personal and professional life may be seriously damaged by a complaint made in bad faith. Therefore, if after thorough investigation, LoopTech determines that any personnel have knowingly provided false, exaggerated, or embellished information in the report or during the investigation, then disciplinary action may be taken.

6. ADA Policy

LoopTech will not discriminate against qualified individuals with a disability with regard to any aspect of employment. The company is committed to complying with applicable federal and state law, including the Americans with Disabilities Act, as amended. A disability under this policy means a physical or mental impairment that substantially limits one or more major life activities of the individual, a record of such an impairment, or being regarded as having such an impairment.

The company recognizes that some individuals with disabilities may require reasonable accommodations. If you are disabled or become disabled and you require a reasonable accommodation, you should contact Human Resources to begin the interactive process, which will include discussing your disability, limitations, and possible reasonable accommodations that may enable you to perform the essential functions of your position, make the workplace more readily accessible to and usable by you, or otherwise allow you to enjoy equal benefits and privileges of employment. The company, however, is not required to provide such accommodations if (a) they would create an undue hardship to the company or (b) they would not eliminate a direct threat to the disabled individual or others in the workplace.

7. Work-related Accident, Injury, and Illness Policy

Maintaining a safe workplace is of immense importance to LoopTech. It is your responsibility as an employee to promptly report workplace accidents, injuries, or illnesses to permit the company to determine the cause(s) as quickly as possible to prevent or avoid other similar incidents. Failure to report a known accident or work-related injury or illness according to this policy may result in discipline. Additionally, you have the right to report work-related accidents, injuries, and illnesses without fear of retaliation from the company or other employees. You are encouraged to notify the company if you feel you have been retaliated against for reporting a work-related accident, injury, or illness.

If you sustain an injury or become ill during working hours, you must report it to your immediate supervisor or someone in your management group as soon as possible after the occurrence and no later than the end of your shift or before you leave the

company premises. In instances where an injury or illness may not be immediately apparent (such as a muscle pain which worsens or develops over time), you must notify your supervisor or someone in your management group immediately upon becoming aware of the injury or illness, or as soon as reasonably possible. If you become aware of a work-related injury or illness outside of work, you must immediately report the injury or illness to your supervisor or someone in your management group.

A written incident report must be completed with your supervisor or someone in your management group before leaving the company premises, unless the severity of the injury or illness prevents you from doing so or if the injury or illness is not immediately apparent, in which case the report must be completed as soon as possible thereafter. You should identify if there were any witnesses to the incident and list them on the reporting form. Your supervisor and any witnesses will also complete a report of the incident if necessary. At the discretion of the company, workplace accidents may require a post-accident drug and/or alcohol test. The company will reasonably consider the facts of each accident and in its best judgment decide whether drug and/or alcohol use may have contributed to the situation before requiring an employee to submit to a post-accident drug or alcohol test. The company will comply with all applicable state and federal law in the administration of this policy, including the Occupational Safety and Health Act (OSHA) and its implementing regulations.

8. Pay Transparency Nondiscrimination Provision

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

C. Company Statement on Unionization

Quality and craftsmanship are keynotes to LoopTech's success. As an employer, LoopTech asks for pride in work, attention to detail, positive attitude, and regular attendance. In return, the company will always strive to give you the best working conditions and benefits.

For example, LoopTech was to our knowledge the first company in Indiana to have our type of profit-sharing plan. We also provide our employees with many other valuable employment benefits, including paid life, hospitalization, major medical, optical, and dental insurance; paid holidays; paid time off; bereavement leaves; medical and family leaves; perfect attendance pay; and paid disability benefits.

Pay raises and many benefits are keyed to the company's performance. No union can claim that it secured these benefits for you; you secured them by making the company a success – a leader in its field. We, therefore, believe that unionization has no place at LoopTech.

D. Personnel Records

LoopTech maintains a personnel file for each employee. Personnel files are the property of LoopTech. Access to personnel files is limited to the extent permitted or required by law. To ensure that each employee's personnel file is always up to date, employees are encouraged to access the Human Resource Information System to update any changes in their name, telephone number, home address, marital status, number of dependents, and the persons to notify in case of emergency.

E. Open-Door Policy and Employee Relations

LoopTech encourages employees to communicate with management concerning work-related issues. If an employee has a work-related issue, the employee should bring it to the attention of a member of management, an employee relations specialist, or Human Resources. LoopTech will take the appropriate steps to investigate and resolve the issue.

As part of the LoopTech Open-Door Policy, employee relations specialists will be available to employees. The Employee Relations Specialist's role is to act as a liaison between the employee and management concerning work-related issues. Employees are encouraged to discuss work-related issues with an employee relations specialist. The employee relations specialist will attempt to assist the employee in resolving the problem, which may include reporting the problem to appropriate members of management.

F. Evaluation Period and Performance Reviews

The first eight weeks of an employee's employment with LoopTech will serve as an evaluation period for the company. During this period, if the company determines that the employee's performance is not satisfactory, then the company may provide the employee with additional training, reassign the employee to another position, or terminate the employee's employment. Employees are not guaranteed employment for the duration of this evaluation period. In addition, successful completion of this evaluation period does not guarantee an employee's continued employment with LoopTech for any duration.

Performance and merit wage reviews are provided for all LoopTech employees as an opportunity to communicate performance strengths and weaknesses, as well as to determine appropriate training to be scheduled. Performance and wage reviews will be performed on at least an annual basis.

III. COMPENSATION POLICIES

A. Work Hours

The regular workweek is Sunday through Saturday. The nature and responsibilities of an employee's position may not lend themselves to fixed work hours and schedules. Accordingly, work hours and schedules may be determined by management to meet the

varying conditions of our business.

Full-time employees are those employees who are regularly scheduled to work 36 to 40 hours each workweek. Normally, for each workday, an employee will be given one unpaid lunch break of 30 minutes and two 20-minute breaks with pay. Employees working a 12-hour workday will receive an additional 20-minute break with pay.

B. Recording Work Hours

All employees shall record their actual work time and absences by use of a time clock or other company-approved method. Employees are required to clock out and, in each time, they leave the company premises for non-business reasons (e.g., meal breaks, doctor appointments, etc.). Failure to record work hours in a timely manner may cause delay in an employee's receipt of compensation. Employees should not clock in earlier than 7 minutes prior to the beginning of their scheduled start time. Employees are not permitted to perform any work prior to their scheduled start time or after their scheduled ending time absent prior management authorization. Employees are strictly prohibited from performing any work "off the clock." Clocking in or out for another employee is strictly prohibited. Failure to comply with this policy, or falsification of any time clock records, shall be grounds for disciplinary action up to and including termination.

If an employee believes they have not been compensated for actual working time or observes others who have not been compensated for actual working time, the employee should promptly report the matter to Human Resources.

C. Payday

Employees will be paid by check or direct deposit on a weekly or bi-weekly basis. To participate in the direct deposit program, employees should access the Human Resource Information System to provide banking information. All required deductions, such as for federal, state, and local taxes and authorized voluntary deductions, will be withheld automatically from the employee's pay.

D. Overtime and Premium Pay

1. Overtime

Employees will be permitted to work overtime only if it is authorized in advance by their supervisor or a member of management. Employees will be paid 1.5 times their regular hourly rate of pay for all hours paid by LoopTech in excess of 40 hours in any given workweek, excluding Parental Leave and Leaves that qualify for short-term disability pay.

2. Premium Pay

Employees will be paid 2.5 times their regular hourly rate of pay for all hours actually worked on a company-recognized holiday. Employees will not be entitled to overtime pay in addition to premium pay for hours worked on holidays or Sundays.

Employees will be paid premium pay (2.5 times their regular hourly rate) for hours actually worked on Sunday. If the following stipulations are met during the workweek (Sunday through Saturday):

- The employee must be compensated for 40 hours Monday through Saturday. This includes regular pay, OT pay, PTO, Jury Duty, Bereavement or Holiday Pay.
- If hours compensated Monday through Saturday are less than 40, premium pay will not be paid until the employee reaches 40 hours total for that workweek.

3. Emergency Call-in Pay

From time to time, employees may be called in to work for emergency reasons. In such instances, an employee will be paid for any hours actually worked at the applicable pay rate (e.g., straight-time pay, overtime pay, or premium pay); however, any employee called in under this provision will receive a minimum of four hours of pay or the actual hours worked, whichever is greater.

4. Shift Differential Pay

Full Time employees will receive the following increases of their regular hourly rate of pay for all hours actually worked during a second or third shift:

- First shift: A work shift that begins at or after 4:00 a.m. but before 10:00 a.m. on a given workday. Employees working this shift will receive their regular hourly rate of pay.
- Second shift: A work shift that begins at or after 10:00 a.m. but before 8:00 p.m. on a given workday. Employees working this shift will receive a 15% increase in their regular hourly rate of pay.
- Third shift: A work shift that begins at or after 8:00 p.m. but before 4:00 a.m. on a given workday. Employees working this shift will receive a 15% increase in their regular hourly rate of pay.
- 3-12s shift: A work shift that covers 3 days working 12 hours each day (36 hours total). Employees working this shift will receive a premium 15% increase in their regular hourly rate of pay.

E. LoopTech Rewards Teamwork (CRT) Bonus

LoopTech Rewards Teamwork (CRT) is our global incentive program that was originally developed to drive company performance and serve more patients by increasing production of our medical devices. The goal of the program is to give employees more direct ownership of their daily work and understand how they contribute to the overall success of the company. CRT allows employees to earn up to 12% of their quarterly wages.

CRT bonuses shall be paid during the month following the applicable quarter. Employees who do not work throughout the entire quarter (e.g., those hired, terminated or on a leave of absence during the quarter) are entitled to a pro-rata share of the CRT bonus that is based upon wages earned during the quarter. Details of the CRT bonus program are available from Human Resources. LoopTech reserves the right to make changes to the CRT bonus program at its sole discretion.

IV. TIME-OFF BENEFITS

A. Paid Time-Off (PTO)

LoopTech grants paid time-off ("PTO") to its full-time employees. Part-time and Seasonal employees are not eligible for PTO. Employees may use PTO for vacation, sickness, their birthday, personal activities and for the purpose of taking leave under any applicable state, city, or county paid sick leave law. Where PTO is used for a purpose covered under a paid sick leave law, the terms and conditions of the PTO policy shall govern, unless the applicable provision of the paid sick leave law provides a more generous benefit to the employee.

Full-time employees shall receive their entire annual allotment of PTO hours on the first day of their month of hire of each year of employment as follows:

<u>Length of Employment</u>	<u>PTO Hours</u>
1st through 3rd year	104
4th and 5th year	120
6th through 10th year	152
11th and 12th year	168
13th and 14th year	176
15th and 16th year	184
17th and 18th year	192
19th and 20th year	200
21st year and beyond	240

Employees must be employed by LoopTech for at least 8 weeks before they are eligible for PTO and can begin using it.

1. Use and Payment of PTO

PTO must be taken in hourly increments. PTO will be paid at the employee's regular rate of pay. PTO payments will be made on the next regular payday for the period in which the PTO is taken. No payments will be made in lieu of taking PTO, except that, upon the next regular payday following termination of employment, employees are entitled to payment for any PTO that is unused as of termination.

2. Scheduling of PTO

Employees should give their supervisors as much advance notice as possible of their intent to use PTO. All requests for PTO are subject to approval by management, and management reserves the right to limit the number of approved PTO requests for any particular period. All PTO requests must be submitted in the Human Resource Information System.

Generally, PTO requests will be granted based on the individual department needs. Requests to schedule PTO around holidays and in blocks of time one week or longer should be made with as much advance notice as possible. When PTO requests are made before January 31, seniority will be taken into consideration and these requests will be given priority over later requests.

Employees can use unscheduled PTO (called in or taken after the workday has begun) 12 times per year. If call-in or unscheduled PTO is utilized more than 12 times, the absence will result in one attendance point per occurrence. Call- in and unscheduled PTO must be approved by management.

Call-in or unscheduled PTO may be used the day before or after a Holiday. If unscheduled PTO is used the day before or after a holiday. The employee will forfeit an equal number of hours in holiday pay.

3. PTO Balances in your Human Resource Information System

- a. **PTO Current Year:** Available PTO based on your hire date and available for use 8 weeks after hire date.
- b. **PTO Carry Over:** PTO carried over from previous years, up to 40 hours maximum, and is available for use immediately in addition to the balance shown in "PTO current year."
- c. **PTO Unavailable:** Any additional balance after PTO Carry over is determined, up to 160 hours maximum. It is not available for use in the current year.

4. PTO Carry Over

At the end of each 12-month period, employees may carry over (save) unused PTO to the PTO Unavailable bucket for future use. Your PTO Current Year, PTO Carry Over and PTO Unavailable (sometimes known as "banked") are re-figured at the START of every PTO period. The PTO unavailable bucket may not exceed 200 hours. This includes a maximum of 40 hours of PTO Carry over that can be used in the following 12- month period.

Accordingly, any unused PTO in a 12-month period that would be in excess of 200 hours cannot be carried over for future use. Only 200 hours can be carried over from year to year. If the sum of Carry Over + Current Year + PTO Unavailable is greater than 200 hours, you will forfeit any hours over 200.

Example: An employee has 160 hours in their PTO unavailable bucket and 56 hours combined in PTO current year and PTO carry over buckets at the end of a 12-month period. 16 hours would be forfeited.

160 hours of PTO Unavailable + 40 PTO Carry Over hours + 16 PTO Current year = 216 hours of PTO
16 hours would be forfeited (this sum is over the 200 maximum).

This employee would then have 40 Carry Over + 160 Unavailable + Hours of Current Year PTO eligibility.

For any questions regarding PTO Carry Over please contact your HR representative.

Employees may choose or LoopTech may require them to use PTO while taking a leave of absence, including FMLA. If the employee is on a leave of absence in excess of 12 weeks in any calendar year, the PTO entitlement for the following calendar year could be impacted. See [Section IV – Item N](#).

B. Holiday Schedule

LoopTech recognizes the following paid

holidays: New Year's Day
Memorial Day
Independence Day
Labor Day
Thanksgiving Day
Friday after Thanksgiving Day
Christmas Eve
Christmas Day

Full-time employees are entitled to time off with pay for these holidays. Holiday pay will be based upon an eight-hour day and shall be paid at the employee's regular hourly rate of pay.

A PTO day that was requested and approved by management *prior to the day before or after a holiday* is considered a day worked for holiday pay eligibility. Holiday pay will be paid on the regular payday covering the pay period in which the holiday falls. Employees who regularly work four days per week (10 hours per day) will work 8 hours per day only during the week in which a holiday falls.

To be eligible for holiday pay, employees must work the number of hours normally scheduled the day before and/or after the holiday or use scheduled PTO the day before and/ or the day after a holiday. Unscheduled PTO may be granted the day before and after a holiday, however the holiday would not be paid.

Example: Employee has called in unscheduled PTO the day before or after a holiday. If approved, they would be paid for that day but would lose their holiday pay.

Weekend shift employees will get 60 hours of holiday pay each year. Holidays will be manually scheduled annually, and a calendar will be published.

1. Floating Holiday

Full-time employees are entitled to one floating holiday that can be taken to celebrate a cultural or religious day, your birthday, or another day that matters to you. This day can vary from year to year but must be scheduled in the Human

Resource Information System and taken in line with other PTO policies. An employee must be employed on January 1st of the new year to qualify for that year's floating holiday. The floating holiday must be used in an eight-hour block of time within the calendar year and will not rollover. Weekend shift employees will receive a 12-hour floating holiday that must be used in a 12-hour block of time within the calendar year and will not rollover. An unused Floating Holiday will not be paid out upon termination.

C. Bereavement

Full-time employees will be granted up to 40 hours of time off from work in the event of a death of their spouse, co-habiting domestic partner, child, or stepchild. 24 hours of time off will be granted for the death of a sibling, step- or half-sibling, stepparent, grandchild, parent or parent-in-law, brother-in-law or sister-in-law, son-in-law or daughter-in-law and grandparent/grandparent-in-law. This time is with pay for employees who have been employed with LoopTech for at least 8 weeks and without pay for employees who have been employed with LoopTech for less than 8 weeks.

All requests for bereavement time should be made to a member of the employee's management team. Additional bereavement time may be granted only under extenuating circumstances. And only once the immediate manager and Human Resources have mutually agreed on any potential extension of bereavement time. Any discretionary bereavement time will be without pay.

Employees may not substitute bereavement pay while on a paid or unpaid leave of any kind. Employees who qualify for bereavement pay under this policy may utilize this benefit upon return from leave with appropriate leadership notification.

Employees may be granted up to 8 hours of time off from work without pay to attend the funeral of a friend or distant relative. Using this time will affect Perfect Attendance but will not have attendance points associated with it.

D. Jury and Witness Duty

Employees are eligible for time off if summoned to serve in court as a juror or subpoenaed to appear in court as a witness.

To qualify for jury or witness duty, employees must submit to their supervisors a copy of the summons to serve or subpoena to appear as soon as they receive it. In addition, proof of service as a juror or appearance as a witness must be submitted to the employee's supervisor when the period of jury or witness duty is completed.

Employees are eligible for paid time off for the first 10 days of jury duty that fall on the employee's regularly scheduled days of work ("Paid Days"); however, employees must pay to LoopTech any amount of jury duty pay they receive from the court. Jury duty is unpaid following the Paid Days. Jury duty pay will be based upon the employee's standard workday and shall be paid at the employee's regular hourly rate of pay. Time off for part- time employees to serve as a juror is without pay.

Witness duty (subpoena) will be unpaid. Any time off due to a summoned to serve as a juror, or a subpoenaed appearance in court, will be an excused absence.

If the employee is released from jury or witness duty at least 2 hours prior to the end of a workday, the employee is required to return to work that day.

E. School Time

This time applies to employees who are a parent, guardian, or person standing “in loco parentis” of a school-aged child (including college students but excluding preschoolers). You are entitled to a total of 4 hours of unpaid time per calendar year to attend, or otherwise be involved in, that child’s or children’s school activities. This time will be excused and can be taken in 15-minute increments. Employees must give appropriate advance notice when school time is needed. Specific questions should be addressed to Human Resources.

F. Lactation Accommodation

LoopTech will provide employees who give birth to a child a private location where the employee can express their breast milk and a refrigerator or other cold storage place for keeping the milk that was expressed, for one year following the birth of their child. The employee can use a reasonable amount of time which will include their breaks and/or lunch period. LoopTech will also allow an employee to provide their own portable cold storage device for keeping milk that has been expressed until the end of the employee’s workday.

G. Military Leave

Employees are eligible for military leave. Such leave and the re-employment rights of an employee upon return from such leave shall be determined in accordance with applicable federal and state law and regulations. If an employee is called to, or volunteers for, active military duty or Reserve or National Guard training, the employee should notify his or her supervisor or other designated person and submit copies of applicable military orders as soon as practical. If an employee’s military pay is less than his or her regular base pay (excluding CRT bonus and other compensation and benefits), LoopTech shall make up the difference for a period not to exceed 12 months during any rolling 5-year period, measured backwards from the date the employee uses any military leave. Otherwise, military leave shall be without pay. An employee on military leave may elect to substitute any accrued, unused PTO in place of unpaid leave under this policy. See Human Resources for more information.

H. Indiana Family Military Leave

In compliance with the Indiana Military Family Leave Act, LoopTech grants 10 working days of unpaid leave in a calendar year to any employee who is the spouse, parent, grandparent, or sibling of an individual called to active military duty in the armed forces of the United States, the Indiana Army National Guard, or the Indiana Air National Guard. The family member must be scheduled for at least 89 consecutive days of active military duty for the employee to qualify for family military leave. To qualify for the family military leave, employees must have worked for LoopTech at least 12 months and must have worked at least 1,500 hours during the 12-month period immediately preceding the first day of the scheduled family military leave.

Eligible employees are permitted to take family military leave during the following time

periods:

- (1) During the 30 days before their family member's active-duty orders take effect.
- (2) During their family member's leave from duty while active-duty orders remain in effect; and
- (3) During the 30 days following the termination of their family member's active-duty orders.

Employees should provide written notice to their immediate supervisors or direct management report of the date they would like to begin taking family military leave. Such written notice must be given at least 30 days prior to the date on which the employee requests that family military leave begin, except when the family member receives active-duty orders less than 30 days before the employee's requested leave is set to begin. LoopTech may request verification from the employee regarding his or her eligibility for family military leave. LoopTech may request a copy of the family member's active-duty orders if such documentation is available. LoopTech may also request proof of the employee's relationship to the family member. If LoopTech requests verification of the employee's eligibility for family military leave and the employee fails to submit the requested verification, LoopTech may count any absence from work as unexcused and proceed with any appropriate disciplinary action.

LoopTech may require that the employee, or the employee may elect to, substitute any accrued, unused PTO for unpaid leave under this policy. An employee who is taking family military leave will be permitted to continue his or her healthcare benefits at the employee's current expense.

I. FMLA Leaves of Absence

LoopTech recognizes that employees may need to take time off from work because of their own medical reasons and medical reasons affecting their families. The company provides family and medical leave in compliance with the Family and Medical Leave Act (FMLA). Below is a summary of your rights under the FMLA.

1. Eligibility

To be eligible for FMLA leave you must (a) have worked with LoopTech for at least 12 months and (b) have worked at least 1,250 hours for LoopTech during the previous 12 months.

2. Basic Leave Entitlement

If you are eligible, you may take up to 12 weeks of unpaid leave during a rolling 12-month period for one or more of the following reasons: (a) for incapacity due to pregnancy, prenatal medical care or child birth; (b) to care for your child after birth, or placement for adoption or foster care; (c) to care for your spouse, son, daughter, or parent who has a serious health condition; or (d) for a serious health condition that makes you unable to perform your job.

The "rolling" 12-month period is measured backwards from the date FMLA leave is to begin and is used to determine the amount of FMLA leave available to you. All FMLA-qualifying leave taken during the 12-month period is added together for

purposes of determining your eligibility.

3. Military Family Leave Entitlements

If you are eligible and your spouse, son, daughter, or parent is a military member on covered active duty or called to covered active-duty status (deployment of the member with the armed forces to a foreign country), you may use your 12-week FMLA leave entitlement during a rolling 12-month period to address certain qualifying exigencies. Examples of qualifying exigencies include issues related to short-notice deployment, attending certain military events, arranging for alternative childcare, caring for military member's parents, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

If you are eligible, you may take up to 26 weeks of leave to care for a covered service member during a single 12-month period beginning on the first day of leave. A covered service member is (a) a current service member of the Armed Forces or Reserves, including the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy; is otherwise in outpatient status; or is otherwise on the temporary disability retired list for a serious injury or illness; or (b) a veteran of the Armed Forces (including the National Guard and Reserves) who is discharged (other than dishonorably discharged) within the five-year period before the eligible employee takes military caregiver leave to care for the veteran and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.

Military Family Leave is unpaid.

4. Definition of Serious Health Condition

A “serious health condition” is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or “continuing treatment” by a healthcare provider for a condition that either prevents you from performing the functions of your job or prevents the qualified family member from participating in school or other daily activities. Ordinarily, unless complications arise, the common cold, the flu, earaches, upset stomach, minor ulcers, headaches other than migraine, routine dental or orthodontia problems, and periodontal disease are examples of conditions that are not “serious health conditions” and do not qualify for FMLA leave.

Subject to certain conditions, the “continuing treatment” requirement may be met by

- (a) a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a healthcare provider or one visit and a regimen of continuing treatment, or
- (b) incapacity due to pregnancy, or
- (c) incapacity due to a chronic condition.

Other conditions may meet the definition of “continuing treatment.”

5. Use of Leave

Employees are not required to use their FMLA in one block. When medically necessary, leave may be taken on an intermittent or reduced-schedule basis. Leave due to qualifying exigencies may also be taken on an intermittent basis. You must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the company's operations.

Bonding time (leave taken to care for and bond with a healthy newborn) is not allowed to be used on an intermittent basis.

FMLA leave for bonding time can be taken as a reduced schedule leave. You may be required to transfer temporarily, during the period of reduced leave, to an available alternative position for which you are qualified, and which better accommodates recurring periods of leave. Transfer to an alternative position may include altering an existing job to better accommodate the employee's need for reduced leave.

FMLA leave for bonding time must be taken during the 12 months immediately following the date of the baby's birth. Bonding time is unpaid. If both spouses are employed by LoopTech (even if employed at different worksites or divisions), the combined total weeks of FMLA leave to which the spouses are entitled is limited to 12 weeks during any 12-month period when leave is taken for the following reasons:

- For the birth and care of the newborn child; and
- For placement of a child for adoption or foster care, or to care for the employee's child after placement.

6. Substitution of Paid Leave (PTO)

Employees may choose, or LoopTech may require them, to use PTO while taking FMLA leave. When paid leave is being used for an FMLA leave of absence, you must comply with LoopTech's normal paid leave and related policies including but not limited, LoopTech's Attendance Policy. For example, if an employee requests PTO during unpaid FMLA leave and provides less than one day prior notice, the PTO will be considered Unscheduled PTO and either reduce the employee's allotment of Unscheduled PTO or, as applicable, result in the assessment of one point under the Attendance Policy.

7. Benefits and Protection

All group health benefits (e.g., major medical, hospitalization, and dental) will continue during FMLA leave on the same conditions as if you had been continuously employed, provided that you had such coverage prior to the FMLA leave. If you are receiving PTO and/or STD pay during your FMLA leave, you will continue to pay your share of health plan premiums by the method normally used during paid leave (e.g., payroll deduction) and the company will pay its share of health plan premiums. If your PTO or STD pay does not cover your share of health plan premiums, or if your FMLA leave is unpaid, the company will collect the unpaid amount of your share of health plan premiums in installments upon your return to work by payroll deductions

over a period of time equal to the period of time you are in arrears. If you fail to return

to work at the end of your FMLA leave (other than for circumstances beyond your control), you may be required to reimburse the company that portion of health plan premiums paid by the company during your leave.

Upon return from FMLA leave, you will be reinstated to your original job or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment. In addition, your use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of your leave.

8. Employee Responsibilities

Employees must provide 30-days advance notice of the need to take FMLA leave when the need for leave is foreseeable. When 30 days' notice is not possible, you must provide notice as soon as practicable and generally must comply with LoopTech's normal call-in procedures.

You must provide sufficient information for the company to determine if the leave may qualify for FMLA protection and about the anticipated timing and duration of the leave. Sufficient information may include that you are unable to perform your job functions, or a family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a healthcare provider, or circumstances supporting the need for military family leave. You also must inform the company if the requested leave is for a reason for which FMLA leave was previously taken or certified.

In addition, you must provide the company with a completed medical certification form supporting the need for leave within 15 days of receiving the blank certification form from the company. If you fail to provide the completed medical certification to the company in a timely manner, you may lose your entitlement to FMLA leave for the absence. Recertification may also be required in certain circumstances. If leave is due to your own serious health condition, you must provide a fitness-for-duty certificate prior to returning to work.

9. Employer Responsibilities

If you request FMLA leave, the company will inform you whether you are eligible under the FMLA. If you are eligible, the company will also inform you of any additional information that will be required for you to qualify for leave, as well as your rights and responsibilities, and will provide you with a copy of this policy. If you are not eligible, the company will provide you with the reason for the ineligibility.

Once it is determined that you are eligible for FMLA and you have provided the company with the appropriate certification, the company will inform you of whether your leave is being designated as FMLA-protected, including the amount of leave that will be counted against your leave entitlement.

10. Light Duty Work Assignment

If you are assigned light duty work due to an occupational or non-occupational medical condition and qualify for FMLA leave, you may decline the light duty work and exercise your rights under the FMLA.

11. Enforcement

The FMLA prohibits employers (a) from interfering with, restraining, or denying the exercise of any right provided under the FMLA and (b) from discharging or discriminating against any person for opposing any practice made unlawful by the FMLA or for involvement in any proceeding under or relating to the FMLA.

Complaints may be addressed through the U.S. Department of Labor (DOL) or private litigation. The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights. Pursuant to section 109 of the FMLA, LoopTech has posted the DOL's "Employee Rights and Responsibilities" notice. Regulation 29 C.F.R. § 825.300(a) may require additional disclosures.

J. Non-FMLA Medical Leave of Absence (MLOA Leave)

During the employee's initial partial year of employment and before completing the service requirements to be eligible for FMLA, a newly hired, full-time employee may be entitled to a non-FMLA medical leave of absence (MLOA leave) for their own serious health condition, up to a total of 12 workweeks. MLOA leave may not be available if there is an available alternative position for which the employee is qualified that can accommodate the employee's medical conditions. The company does retain the right at its discretion to approve or deny the employee's leave, to limit its duration, and to make exceptions on a case-by-case basis. MLOA leave shall expire immediately upon the employee becoming eligible for FMLA leave.

Except as provided for in this MLOA policy, or unless LoopTech informs the employee otherwise, the rights and obligations described for FMLA leave will also apply to MLOA leave (e.g., method of pay, continuation of benefits, and notice and medical certification requirements); however, an employee is not eligible to take MLOA leave on an intermittent or reduced-leave basis, and the company does not guarantee an employee's reinstatement upon his or her return from MLOA leave. The company will, at its discretion, endeavor to place the employee in their former position or in a position comparable in status and pay, subject to, among other considerations, budgetary restrictions, the company's need to fill vacancies, and the ability of the company to find qualified temporary replacements.

K. Extended Major Medical Leave (EMM Leave)

If an employee has a major medical condition that prevents them from returning to work at the conclusion of an FMLA leave, the employee may be eligible for an extended leave of absence for up to 14 additional workweeks (EMM leave). EMM leave is available only as a continuation of an approved FMLA leave that the employee was using for the same medical condition on a continuous basis (as opposed to on an intermittent or reduced-leave basis) and will not be available for any medical condition once the employee has returned to work for that condition. EMM leave may also not be available if there is an available alternative position for which the employee is qualified that can accommodate the employee's medical condition. In addition, the company, subject to applicable law, may deny EMM leave if the employee's medical condition would prevent the employee from returning to work following the exhaustion of EMM leave. Unlike FMLA leave, EMM leave is not guaranteed, and the company retains the

right at its discretion, to approve or deny an EMM leave, to limit its duration, and to make exceptions on a case-by-case basis.

Except as provided for in this EMM policy, or unless LoopTech informs the employee otherwise, the rights and obligations described for FMLA leave will also apply to EMM leave (e.g., method of pay, continuation of benefits, and notice and medical certification requirements); however, an employee is not eligible to take EMM leave on an intermittent or reduced-leave basis, and the company does not guarantee an employee's reinstatement upon his or her return from EMM leave. The company will, at its discretion, endeavor to place the employee in his or her former position or in a position comparable in status and pay, subject to, among other considerations, budgetary restrictions, the company's need to fill vacancies, and the ability of the company to find qualified temporary replacements.

An employee may not use EMM leave more than once during any 12-month period. In addition, if an employee while on EMM leave recoups FMLA days under the "rolling" 12-month period, the employee will be required to use such FMLA days concurrently with any remaining EMM leave.

L. Parental Leave

Full-time employees who have completed 8 weeks of employment are eligible to receive parental leave due to the birth of the employee's child or placement of a child with the employee in connection with an adoption ("PL"). The purpose of PL is to allow employees to care for and bond with a newborn or a newly adopted child. To be eligible for PL, employees must:

- Have given birth to a child; or
- Be one of the primary caregiving parents of the newborn child; or
- Have adopted a child aged 17 or younger. The adoption of a new spouse's child is excluded from this policy.

Eligible employees will receive a maximum of 120 hours of PL per birth or adoption of a child/children. Multiple births or adoptions (e.g., the birth of twins or adoption of siblings) do not increase the number of hours of PL.

PL must be taken within the 6-month period immediately following the birth or adoption of the child. Employees must take PL in one continuous period of leave. Any unused PL will be forfeited.

PL is in addition to any FMLA, MLOA, or EMM leave that is being used due to the birth of an employee's child or the placement of a child for adoption. PL may be taken at the conclusion of any FMLA, MLOA, or EMM leave that is being used.

PL is unpaid. Employees, however, may use PTO or Parental Supplemental Pay ("PSP") during PL.

The company will maintain all benefits for employees during the PL period. If a company holiday occurs while the employee is on PL, such holiday will not extend the total PL entitlement.

An employee must provide the employee's supervisor and human resources with notice

of the request for PL at least 30 days prior to the proposed date of the PL (or if the leave was not foreseeable, as soon as possible, complying with LoopTech's normal call-in procedures). The employee must complete the necessary forms and provide all documentation as required by human resources to substantiate the request.

Alternative Work Schedules and State Laws

The above policies may be administered differently when employees are on an alternative work schedule (e.g., four 12-hour days). In addition, Government Entitlements may alter the manner in which LoopTech can apply the above policies.

M. Work-Related Injuries

If an employee suffers a work-related injury, he or she may be entitled to worker's compensation benefits, including medical cost reimbursement and lost wage benefits. Unless applicable law requires otherwise, the company does not provide additional leave for work-related injuries beyond that described above.

For work-related injuries, the company, at its discretion, may make "light-duty" work assignments available as a means of avoiding the need for a leave of absence. Light-duty assignments are temporary and normally will not exceed 60 days. The length of each light-duty assignment will be determined by the company on a case-by-case basis, considering various factors, including the medical condition, job duties, and needs of the business.

Contact Human Resources for more information, if necessary.

If you are assigned light duty work and qualify for FMLA leave, you may decline the light duty work and exercise your rights under the FMLA.

N. Leaves and PTO

Any employee whose total use of any form of approved leave (except jury duty, bereavement, and Parental Bonding leave) extends beyond 480 hours during their 12-month period will result in the reduction of PTO that may be accrued in the following 12-month period. After 519 hours of total leave, an employee's PTO accrual will be reduced by 8 hours and an employee's PTO accrual will be reduced by 8 additional hours every two weeks thereafter, consistent with the following schedule:

Full Weeks of Leave

<u>Hours of Approved Leave</u>	<u>Reduction of Accrued PTO Hours</u>
520-599	8
600-679	16
680-759	24

(Continues, if necessary, in accordance with above rules)

State laws may require administration of this policy to differ based on an employee's

residence and/or primary workplace.

Employees may choose, or LoopTech may require them, to use PTO while taking a leave of absence. When PTO is used during a leave of absence, the employee must comply with LoopTech's normal paid leave and related policies, including but not limited to, LoopTech's Attendance Policy. For example, if an employee requests PTO during unpaid FMLA leave and provides less than one-day's prior notice, the PTO will be considered Unscheduled PTO and either reduce the employee's allotment of Unscheduled PTO or, as applicable, result in the assessment of one point under the Attendance Policy.

O. Short-Term Disability Pay

Full-time hourly employees are eligible to receive short-term disability (STD) after completing 8 weeks of employment. In order to receive STD, eligible employees must be on an approved continuous FMLA leave, MLOA leave, or EMM leave for the employee's own serious health condition, excluding giving birth to a child (Please see "Childbirth Supplement Pay" section). Employees on intermittent leave will not be eligible for STD pay.

STD for serious health conditions will be subject to an 8-day waiting period and will be paid at a rate equal to 70 percent of the employee's regular hourly pay times 40 hours of work (excluding any CRT bonus or other compensation or benefits) for the duration of the approved leave.

An employee's right to receive STD is contingent upon the employee providing required medical certifications as requested by the company or required by law. Failure to do so may result in a delay or denial of STD. In addition, an employee on an approved FMLA leave, MLOA leave, or EMM leave is not eligible to receive STD if the company makes available to the employee an alternative position for which the employee is qualified that can accommodate the employee's medical conditions.

If an employee's leave is a result of a work-related injury that entitles the employee to worker's compensation lost-wage benefits, the employee will not receive STD. Rather, the employee will receive only the applicable worker's compensation lost-wage benefits.

NOTE: All of the above policies may be administered differently when employees are on an alternative work schedule, employees will be notified by their management team of any difference. In addition, Government Entitlements may alter the manner in which LoopTech applies the above policies.

P. Childbirth Supplemental Pay

Full-time employees who have completed 8 weeks of employment and are on an approved FMLA, MLOA, or EMM leave due to giving birth to a child are eligible to receive childbirth supplemental pay ("CSP"). CSP will be paid at a rate equal to 100 percent of the employee's regular hourly pay times 40 hours of work (excluding any CRT bonus or other compensation or benefits) for up to a maximum of 6 weeks for a normal birth and 8 weeks for a Caesarean section. CSP is in lieu of any STD the employee would otherwise be eligible to receive under the company's Short-Term Disability Pay policy. CSP will not be subject to an 8-day waiting period.

Alternative Work Schedules and State Laws

The above policies may be administered differently when employees are on an alternative work schedule (e.g., four 12-hour days). In addition, Government Entitlements may alter the manner in which LoopTech can apply the above policies.

Q. Parental Supplemental Pay

Full-time employees who are eligible for leave under LoopTech's "Parental Leave" policy ("PL") are also eligible to receive up to 120 hours of parental supplemental pay ("PSP"). PSP is not additional leave, but rather an additional paid benefit that employees can use during any portions of unpaid FMLA or PL that is being taken to care for and bond with the employee's newborn or newly adopted child. PSP will only be paid during the 6-month period immediately following the birth or adoption of the child and must be paid during one continuous period. Any unused PSP will be forfeited. PSP will be paid at a rate equal to 100 percent of the employee's regular hourly pay times 40 hours of work (excluding any CRT bonus or other compensation or benefits).

Alternative Work Schedules and State Laws

The above policies may be administered differently when employees are on an alternative work schedule (e.g., four 12-hour days). In addition, Government Entitlements may alter the manner in which LoopTech can apply the above policies.

V. EMPLOYEE BENEFIT PLANS

A. Health, Retirement, and Related Benefits

LoopTech has designed benefit programs to assist eligible employees in the event of illness, disability, death, or retirement. These plans generally include group health insurance, life insurance, short-term and long-term disability, 401(k), and profit-sharing plans. Each of our benefit plans is described in summary plan description booklets that are available from Human Resources.

All terms and conditions of the benefits are set out in the master policies that shall control, notwithstanding any provision in this manual or other statement to the contrary. The master policies are available for inspection upon request. Policies, carriers, benefits, coverage, provisions, and other features of the company's benefit programs may be changed from time to time.

In no event shall LoopTech be liable for any claim under an insurance policy. A claim that has been denied by the carrier or insurance administrator shall be pursued exclusively as provided by applicable federal or state law.

Please contact Human Resources if you have questions about eligibility for benefits.

B. Educational Assistance Program

LoopTech has established an educational assistance program to help eligible employees develop their skills and enhance their performance. Full-time employees are eligible to participate in the program. Further details concerning this program are available from Human Resources.

C. Adoption Assistance Program

LoopTech has established an adoption assistance plan to help eligible employees with financial support when adopting a child. Any employee eligible for the LoopTech Health Plan is eligible to participate regardless of whether they are enrolled in that plan.

Further Details concerning this plan are available from Human Resources.

D. Surrogacy Assistance Program

LoopTech has established a Surrogacy Assistance plan to help eligible employees with financial support when using a Surrogate to assist in carrying and giving birth to a child. Any employee eligible for the LoopTech Health Plan is eligible to participate regardless of whether they are enrolled in that plan. Further Details concerning this plan are available from Human Resources.

VI. ATTENDANCE POLICY

Regular attendance and punctuality are important to maintaining high levels of productivity. Reassigning staff or revising schedules to accommodate absences and tardiness prevents us from reaching our goals and puts a burden on all employees. However, we recognize that employees may occasionally need to miss work, arrive late, or leave early due to illness or other unexpected reasons. With this in mind, we have implemented the following attendance policy that uses a point system for all regular, full-time hourly employees.

A. Point System

Employees' attendance will be tracked on a point system. It is the employee's responsibility to be aware of how many points he or she has accumulated. An online system is available to check point levels. Points received remain on the employee's attendance record for 39 weeks. Different types of attendance occurrences will lead to an employee accumulating a certain number of points per the chart below. Descriptions of the types of attendance occurrences can be found on the following pages.

Occurrence	Points
Unexcused Absence less than 15 minutes	1
Unscheduled PTO after 12 occurrences	1
Unexcused Absence of at least 15 minutes, but less than 2 hours	2
Unexcused Absence of at least 2 hours, but less than 4 hours	3
Unexcused Absence of 4 hours or more	5
Late Absence Reporting*	5

No-Call/No-Show	10
-----------------	----

**These points will be in addition to points received for the Unexcused Absence of 2 hours or more.*

B. Absence Reporting

If it is necessary for an employee to be absent, the following procedures MUST be used:

- Employees must report all absences and late arrivals as soon as possible, but no later than two hours after their scheduled starting time. The employee should directly communicate with a member of his or her management group by an agreed-upon method, such as in-person, telephone, voicemail, email, or text. Failure to follow the procedures above will result in points being assigned for late absence reporting. Employees will be advised during orientation of their department's reporting procedures.
- The employee should let management know whether PTO or another approved time-off benefit* is being requested. If the employee does not receive acknowledgement and would like confirmation of his or her request, then it is the employee's responsibility to follow up with management.
- If the employee must leave work during the workday, the employee must report the absence as soon as possible to someone in their management group.
- If an employee believes his or her absence will last more than three consecutive days, it is the employee's responsibility to notify management as soon as possible.
- Depending upon the nature of an employee's particular leave of absence, management will tell the employee how to report any additional days of absence.

C. Unexcused Absence

Employees will receive points for any Unexcused Absence. An Unexcused Absence is any absence from work during an employee's regularly scheduled work hours that (a) does not qualify as one of the approved time-off benefits* described in Section IV of the Employee Manual or (b) is not expressly authorized by the company or applicable law. An Unexcused Absence includes when an employee clocks in after their scheduled starting time, or when an employee clocks out before his or her scheduled ending time.

**Approved time-off: PTO, Bereavement, Military Leave, Jury and Witness Duty, School Time, Indiana Family Military Leave, MLOA (Medical Leave of Absence), FMLA (Family Medical Leave of Absence), EMM (Extended Major Medical Leave), and Parental Leave. See [Section IV Time-Off Benefits](#) for more detailed information.*

D. Scheduled Shift Change

Employees may request a change in their regular starting and ending time for a particular workday. Employees must make the request to and receive approval from a member of their management team during their regular shift or while on approved

overtime at least one day in advance. Requests can also be made while on PTO, if the request is made during their regular shift hours one day in advance. This includes earlier or later start times and leaving work and returning during the workday. If the request is approved, the employee will be required to work the same number of hours as the employee's regular shift in order to not accumulate points. Changes to an employee's regular work hours should be infrequent and may be available only when it can be accommodated by the employee's department.

E. Scheduled PTO

PTO is considered scheduled when it has been requested and approved during the employee's regular shift or while on approved overtime at least one day in advance. Requests can also be made while on PTO, if the request is made during their regular shift hours one day in advance. Management reserves the right to limit the amount of PTO taken by each department.

F. Unscheduled PTO

Any PTO requested less than one day in advance will be designated as Unscheduled PTO. Employees can use Unscheduled PTO no more than 12 times in a calendar year before accumulating points. After 12 times, Unscheduled PTO may be granted, but employees will receive 1 point. Management reserves the right to limit the amount of Unscheduled PTO taken by each department.

G. No-Call/No-Show

A No-Call/No-Show for three consecutive workdays will be deemed job abandonment and a voluntary resignation.

H. Progressive Discipline

Employees will be subject to progressive disciplinary action when the total points accumulated for attendance occurrences reach the following levels during any "rolling" 39- week period:

Points	Disciplinary action
10 points	Written notice
16 points	Written warning
24 points	*Final warning
30 points	Termination

**Final Warning: No employee-requested departmental transfers or promotions, will be permitted while this final warning is in effect.*

The company reserves the right to skip any step in the progressive disciplinary process depending on the circumstances. In addition, employees receiving disciplinary action under this policy are expected to improve their attendance and punctuality. Employees who fail to improve

and sustain improvement may receive additional disciplinary action, up to and including termination.

I. Perfect Attendance

Full-time employees are eligible to receive a bonus for Perfect Attendance. Perfect Attendance means an employee has accumulated no points during their 52-week measurement period. (Employees hired on or after October 1, 2017, will use the week they were hired as the start of their measurement period. Employees hired prior to October 1, 2017, will use the week they last achieved Perfect Attendance or the week after they received their most recent attendance deviation as the start of their measurement period.) The Perfect Attendance bonus will be paid annually based on the completion of their 52- week measurement period.

Example 1: Employee A has had perfect attendance for 5 years as of January 1, 2022, and gets an attendance point on February 1, 2022. This employee would not receive a perfect attendance check in 2023. Given no points are received in 2023, the employee would be eligible for 6 years of perfect attendance in January 2024.

Example 2: Employee B with a hire date of November 15, 2012, would have a measurement period of December 1 each year.

Employees are entitled to the following bonus based on the number of years they have achieved Perfect Attendance:

Years of Perfect Attendance	Bonus
First complete year	*Hourly rate x 8
Two	*Hourly rate x 16
Three	*Hourly rate x 24
And so on ...	

**Hourly rate determined by adding wages paid for Regular Time, O/T, PTO, Bereavement, and Jury Duty, and then dividing by 2,080 (40 hours per week x 52 weeks in a year).*

Note: Employees will keep the number of Perfect Attendance years that are effective as of September 30, 2017, and continue to use that number cumulatively going forward (meaning employees do not start over at 1 year).

Upon termination, employees are not entitled to any Perfect Attendance pay for the period in which the termination occurs. LoopTech reserves the right to discontinue the Perfect Attendance program at any time.

VII. EMPLOYEE CONDUCT

A. Dress Code/Personal Hygiene

LoopTech is a place of business and, as a result, has many visitors. Employees are therefore expected to dress in an appropriate manner. Any inappropriately dressed employee, as determined by management, may be asked to wear a lab coat, or may be sent home to change clothes. If the employee is sent home, it will be without pay unless management permits the employee to make up the time missed. In addition, good personal hygiene is extremely important because of the nature of our business and the controlled manufacturing environment.

Please refer to company QSPs/SOPs for complete detailed requirements.

B. Solicitation and Distribution

In the interest of maintaining a proper business environment and preventing interference with work and inconvenience to others, employees may not distribute literature or printed materials of any kind, sell merchandise, solicit financial contributions, or solicit in any manner (e.g., telephone, e-mail, or orally) for any cause during working time.

Employees who are not on working time may not solicit employees who are on working time for any cause or distribute literature of any kind to them. "Working time" means the time that an employee is required to perform work duties. Working time does not include an employee's meal period or breaks.

Employees may not distribute printed materials of any kind in working areas at any time. Non-employees are prohibited from distributing printed materials or soliciting employees on the company's premises at any time.

C. Use of Company Property

LoopTech employees are expected to exercise due care and caution in the use of company property and to use such property only for authorized purposes. Negligence or intentional misconduct in the care and use of company property may be cause for discipline up to and including termination. The unauthorized removal of company property from the company's premises or the unauthorized use of company property for personal purposes shall be considered cause for discipline up to and including termination. Company property issued to an employee must be returned to the company upon the employee's termination or upon request by the company.

Any employee who fails to return company property will be responsible to LoopTech for the cost of replacing the property.

D. Zero-Tolerance Workplace Violence

LoopTech is concerned about increased violence in society, which has also filtered into many workplaces throughout the United States. As a result, LoopTech has developed this "zero-tolerance" policy to prevent incidents of violence from occurring.

LoopTech expressly prohibits any acts or threats of violence by any employee against any other employee on or off company premises at any time. Any employee who engages in

any threatening behavior or acts of violence or who uses any obscene, abusive, or threatening language or gestures will be subject to immediate disciplinary action up to and including termination.

LoopTech expressly prohibits any acts or threats of violence by or against any of its employees, customers, or visitors at any time while they are on company premises or engaging in business with or on behalf of LoopTech off of company premises.

LoopTech will take immediate action when dealing with employees, former employees, customers, and visitors who engage in such behavior. Such action may include notifying the police or other law enforcement personnel in prosecuting violators of this policy to the maximum extent of the law.

Employees, customers, and visitors are strictly prohibited from bringing firearms or other weapons on the company premises, except as otherwise permitted by law.

Any employee who displays a tendency to engage in violent, abusive, or threatening behavior, or who otherwise engages in behavior that LoopTech, at its sole discretion, deems offensive or inappropriate, will be subject to immediate disciplinary action up to and including termination.

In furtherance of this “zero-tolerance” policy, employees have a “duty to warn” their supervisors, security personnel, compliance officer, or Human Resources of any violation or threatened violation of this policy, including any suspicious workplace activity, situations or incidents that they observe or become aware of involving other employees, former employees, customers, or visitors. This includes, for example, threats or acts of violence, aggressive behavior, offensive acts, and threatening or offensive comments or remarks. Employee reports made pursuant to this policy will be held in confidence to the maximum possible extent. LoopTech will not condone any form of retaliation against any employee for making a report under this policy.

E. Computer and Electronic Information

It is the policy of LoopTech to ensure that its information systems are maintained and used in a secure fashion. This policy applies to all employees, contractors, and visitors to any LoopTech Group company. This policy refers to all company-owned or leased information systems, including computers, voicemail, servers, intranet, Internet, e-mail access, mobile devices (e.g., laptops and cell phones, and removable media (e.g., CD's, DVD's and USB devices).

Confidentiality: All messages, documents, and files created, sent, received, or stored on the systems are the sole property of the company. The company reserves the right to review, intercept, delete, and archive all messages, documents, and files, without notice to the employee, even when password protected or erased.

Security: All company employees are responsible for maintaining IT security. Electronic communications relating to the company must be kept in the company's systems. Company-related e-mail is not to be passed through personal e-mail accounts such as AOL, Google, or Hotmail. Employees who attempt to hack into company systems or engage in other unlawful conduct will be subject to discipline up to and including termination.

Software and Downloads: All software and file downloads must be coordinated through

IT. Employees are prohibited from installing personal software.

Company E-mail: Use e-mail wisely because a sent message cannot be canceled. Use business-like language and tone. Messages must be factual and concise.

Prohibited Content: The following are examples of uses of e-mail that are strictly prohibited:

- Activity in violation of any domestic or international law.
- E-mail that violates the company's Equal Employment Opportunity Policy.
- E-mails that contain false or defamatory statements regarding LoopTech, its employees or another company.
- Sending outside the company e-mails that include nonpublic information or company inventions, designs, trade secrets, or confidential information.
- E-mails including copyright-protected material, e.g., newspaper or journal articles. Employees may use hyperlinks to copyright-protected material available on the internet.
- Chain letters, junk mail, viruses, or spam.
- E-mails promoting non-business sanctioned events without permission from company management.

Disclaimers: The company may place disclaimer statements on all outgoing e-mails. Employees must not disable disclaimers placed on outbound e-mails.

Sender Identity: No e-mail may be sent that attempts to hide the true identity of the sender.

Reporting: E-mail containing prohibited content and e-mail containing viruses or any suspected security issue should be reported to company management immediately.

Litigation and Government Investigations: Employees will be notified by Legal of the need to preserve documents, including e-mail, as part of a "litigation hold." Until notified by Legal that the litigation hold is lifted, employees must:

- Preserve all documents
- Disable any automatic delete functions (e-mail, voicemail, text messaging)
- Suspend following company record retention policies

Internet Use: The systems are company property and are intended for business use consistent with company policies and the Code of Conduct. Subscriptions to mailing lists, chat rooms, and other services must be company related. Disclosing company confidential information or trade secrets over the Internet is prohibited.

Internet sites can and do monitor access and usage and can identify both the user's name and LoopTech's name accessing their services. Accessing an Internet site leaves company- identifiable electronic "tracks," even if the user merely views the material. Exercise appropriate caution.

Employees are allowed moderate personal Internet use. Personal use must:

- Be consistent with LoopTech's Code of Conduct
- Not interfere with productivity
- Be in compliance with this policy

F. Employee Engagement in Social Media

Social media is changing the way employees work and engage with each other, clients, and partners. Social media includes web technologies and sites such as blogging, microblogging (Twitter), photo sharing (Flickr, Instagram), video sharing (You-Tube, Snapchat) live casting ([Periscope](#), [Facebook Live](#)), and social networking (Facebook, LinkedIn). LoopTech is increasingly exploring how online discourse through social media outlets can empower our employees as global professionals, innovators, and citizens.

We believe that through effective social media interactions, LoopTech's greatest asset - the expertise of its employees - can be shared with clients, partners, and the communities in which we operate.

LoopTech has therefore made a strategic decision to embrace social media. We continue to advocate, however, that our employees use social media in a responsible, lawful, and professional manner. To assist employees in avoiding the negative aspects of social media, here are some guidelines to be followed:

1. Do not engage in any conduct that would violate law, the LoopTech Code of Conduct or any company policies, including its equal employment opportunity policy. If you unlawfully harass or threaten another company employee, the company will investigate and take appropriate disciplinary action.
2. If you talk about your job or our business on a website, use a disclaimer such as: "These are my personal views and not those of LoopTech Medical." Only those officially designated by the company have the authority to speak on behalf of the company. LoopTech's logos, trademarks or name may not be used name in a manner that violates company policies or law.
3. Use a personal email address to sign up for social media accounts. Do not use your LoopTech email address.
4. In order to avoid consumer confusion and violations of law, do not post about LoopTech products, brand names or post images of products on any social platform, including private/closed groups.
5. Do not violate the company's confidentiality and intellectual property policies.
6. LoopTech wants to ensure a consistent, controlled message regarding its products and business. Accordingly, employees should not speak to the media on LoopTech's behalf without prior approval.
7. Always be fair and courteous to fellow employees, customers, suppliers or people who work on behalf of LoopTech. If you decide to 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, employees, suppliers, or that might constitute harassment or bullying.
8. Do not engage in conduct that negatively affects your job performance.

Nothing in this policy shall be interpreted to prohibit concerted activities by employees that are protected by law.

To ensure that the use of any electronic communication systems, social media properties,

and business equipment owned or operated by LoopTech is consistent with this policy,
the

company may monitor the use of such systems, properties, and equipment from time to time and resolve, remove, and/or correct items, as necessary.

G. Drug and Alcohol Policy/Smoke-Free Environment

A drug-free and alcohol-free workplace is vital to LoopTech, to workplace safety, to the quality of our services, and to the productivity of our employees. In accordance with this policy, no employee shall report for work or remain at work when he or she uses or is under the influence of alcohol or illegal drugs (including the illegal or improper use of legal drugs). In addition, the unlawful manufacture, distribution, dispensation, possession, sale, or use of a controlled substance in the workplace or while engaged in LoopTech business off company premises is strictly prohibited. Such conduct is also prohibited during nonworking time to the extent that, in the opinion of LoopTech, it impairs an employee's ability to perform on the job or threatens the reputation or integrity of LoopTech. LoopTech reserves the right to test for prohibited drugs as permitted by law, including pre-employment, post-accident, random, and reasonable-suspicion testing. LoopTech also reserves the right to test for alcohol as permitted by law, including reasonable-suspicion testing. As part of its drug testing protocol, and in accordance with applicable state or local law, LoopTech or its designated agent shall be authorized to conduct urine testing (or other reasonable means of testing) for the purpose of laboratory analysis to detect the presence of prohibited drugs.

Verified-Accredited Wholesale Distributors Accreditation: The Verified-Accredited Wholesale Distributors ("VAWD") program was established in 2004 to help protect the public from the threat of counterfeit prescription drugs. LoopTech is a VAWD-accredited facility. In order to maintain its VAWD accreditation, LoopTech must have in place a rigorous set of operating policies and procedures, including an enhanced drug testing program for those employees subject to the VAWD accreditation process. Specifically, those employees actively engaged in or who directly supervise the operation and handling of prescription drugs or covered medical devices, including executive officers, management, officers, and other key personnel, shall be subject to, as permitted by law, pre-employment and reasonable-suspicion drug testing. In addition, all personnel with access to prescription drugs, including executive officers, management, officers, and other key personnel, shall be subject to, as permitted by law, random drug testing (at intervals authorized by the National Association of Boards of Pharmacy® and reasonably determined by LoopTech) and reasonable-suspicion drug testing. Any employees hired prior to April 1, 2014, are not subject to the VAWD enhanced drug-testing procedures.

Searches and Violations of Policy: Entering LoopTech's property constitutes consent to searches and inspections. If LoopTech suspects an individual of violating this policy, it may ask the individual, subject to applicable federal, state or local law, to submit to a search or inspection at any time. Searches can be conducted of pockets, clothing, lockers, wallets, purses, briefcases, lunch boxes, desks, workstations, vehicles, and equipment. In addition, subject to applicable federal, state or local law, LoopTech reserves the right to immediately discipline any employee who violates this policy, refuses to submit to testing, or provides false information, up to and including termination.

LoopTech has also determined that its buildings will remain smoke free. Smoking is allowed only outside LoopTech facilities at designated areas.

H. Confidentiality

Employees may be given access to, generate or otherwise come into contact with or become aware of proprietary, confidential or competitively sensitive information and materials that are the property of or relate to the company or one or more of its affiliates and are not generally known by the public (“Confidential Information”). Confidential Information includes, but is not limited to, financial information, profitability information, pricing information, protected health information, and customer information. Confidential Information is the exclusive property of the company. Employees therefore are strictly prohibited from directly or indirectly using, divulging, disclosing or communicating any Confidential Information (except as necessary to properly perform duties as an employee of the company or with the prior written consent of the company). Employees are further expected to use reasonable care to avoid publication or dissemination of any Confidential Information.

Failure to follow this policy may result in disciplinary action up to and including termination. As a condition of employment, employees may be required to sign employee confidentiality agreements. Nothing in this policy shall be interpreted to prohibit concerted activities by employees that are protected by law.

I. Code of Conduct

LoopTech has adopted a Global Code of Conduct that is applicable to all LoopTech employees. As a foundational document in the LoopTech Group Global Ethics & Compliance Program, the Code outlines the expectation of conducting business ethically and in accordance with LoopTech’s values.

The Code can be found on Electronic Workstations (EWS) and found in the Ethics & Compliance section of the LoopTech [intranet site](#). You can also contact your local HR representative to get a copy. Employees should review the Code, become familiar with it, and understand how the Code applies to their business activities.

J. Raising Questions or Concerns

LoopTech employees are encouraged to help make LoopTech better. Employees may ask a question or raise a concern to a supervisor or manager, or Human Resources or Personnel Manager, local Ethics & Compliance Representative, Company President or Managing Director, or the Chief Ethics & Compliance Officer, as outlined on the Employee Communications Card provided at orientation.

LoopTech also provides a toll-free Global E&C Helpline. LoopTech calls this option a helpline rather than a hotline because it is important for employees to ask questions and raise concerns before they become significant issues. Employees may call the Global E&C Helpline 24 hours a day, 7 days of week. The international helpline toll-free phone numbers and web option can be accessed on the Global E&C Helpline web portal: LoopTech.ethicspoint.com.

Calls and reports can be made anonymously. Employees who wish to remain anonymous will be given a report number and PIN so that they can check on the status of the report, provide additional information, and answer any questions that arise during the investigation. It is important for the employee to check back to help ensure a thorough

investigation can be conducted.

LoopTech has a strict non-retaliation policy to assure employees that they can ask questions or raise concerns, in good faith, without fear of retaliation. The Code of Conduct and Global Ethics & Compliance Program documents can be found on the LoopTech Group Ethics & Compliance website: compliance.LoopTechgroup.com.

K. Behavior of Employees

Certain rules and regulations regarding employee behavior are necessary for the efficient operation of the company and for the benefit and safety of all employees. Conduct that interferes with operations, is offensive to customers or prevents fellow employees from performing their jobs will not be tolerated. Improper behavior and conduct has a direct impact on performance.

All employees are expected to conduct themselves in a manner that is conducive to the efficient operation of the company.

L. Disciplinary Process

When a rule or policy has been broken, or an employee has exhibited unacceptable behavior, disciplinary action to prevent a recurrence is required. LoopTech generally recognizes five steps in the disciplinary process:

1. Written notice
2. Written warning
3. Final Warning
4. Suspension without pay
5. Dismissal

Management reserves the right, at its discretion, to bypass any of the above steps and utilize a higher level of discipline for any given occurrence or accumulation of occurrences. The severity of discipline will depend upon the severity of the occurrence as well as the employee's work history.

Written notices and written warnings will be retained in the employee's personnel file as a record of work performance. Final warnings are in effect for varying periods of time (depending upon severity, up to one year), during which time an employee will not be eligible for employee- requested transfers, or promotions.

M. Termination of Employment

All employees are employees-at-will. Thus, an employee's employment is terminable at will with or without notice or cause by the employee or LoopTech. If an employee wishes to terminate his or her employment, the employee is strongly encouraged to notify LoopTech in writing at least two weeks in advance of his or her intended termination. If an employee's decision to terminate is based on a situation that could be corrected, the employee should discuss it with his or her supervisor before making a final decision. LoopTech reserves the right to accept an employee's notice of termination and to accelerate such notice and make the termination effective immediately or on any other date prior to the employee's intended last day of work.

At the time of an employee's termination, LoopTech will normally conduct an exit interview with the employee. At the exit interview, the reasons for the employee leaving will be discussed, arrangements for payment of the employee's final paycheck will be made (e.g., confirm correct mailing address) and information regarding the employee's insurance coverage and other information relevant to his or her employment will be explained. Generally, an employee's final paycheck will be available on the next regularly scheduled payday for the pay period in which termination occurs.

At the time of the termination (by the end of the last day worked), the employee must return all company property to his or her supervisor.

A Final Word...

LoopTech is a special place with a unique company culture and a rich history of innovative firsts. We've been on an incredible journey for the last six decades, and our continued success is largely in thanks to our strongest asset: you.

As we look toward the future, it will take the commitment of every single one of us to achieve our vision of being relentlessly inventive and deeply connected. No matter where in the LoopTech world you're located—from the manufacturing floor in Winston-Salem, North Carolina to the distribution center in Shanghai, China—you are critically important to helping us achieve our goals and improving the lives of patients.

Bill LoopTech used to say, "If you take care of the company, the company will take care of you". As a LoopTech employee, we want to empower you to reach your full potential by providing resources and benefits that will help you achieve your personal and professional goals. You can find more information about those resources and benefits in this manual, as well as by talking to your manager or local HR business partner.

We think you're a good fit for our company culture, and we need your help. We need you to be actively engaged in preserving our culture and demonstrating our company values in every interaction you have with each other, our customers, and our communities. Each of us has the opportunity and responsibility to continue carrying on the legacy that Bill and Gayle LoopTech started in 1963.

Welcome to LoopTech. We're happy you're here.

This updated policy manual will still cover basic need-to-know information such as Leave processes, PTO, Holiday Schedule, LoopTech Rewards, and many other pertinent employment expectations. We have added a few more sections and made some revisions to others. All changes in this manual are effective April 1, 2024.

- New: Table of Contents with Links – will allow you to click in the table of contents and take you straight to a section in the manual
- Updated Diversity & Inclusion section
- Updates to the Time Off Benefits section
 - PTO Balances
 - Definitions for PTO Current Year, PTO Carry Over, and PTO Unavailable
 - PTO Schedule
 - Removed the use of Partial and Full Years in order to clarify when the increase in PTO will occur for employees
 - Updates to time off during the holidays
 - Unscheduled PTO may be granted the day before or after a holiday without being penalized for that day, however the holiday would not be paid
 - Updates to Floating Holiday
 - Must be used in 8-hour blocks of time
 - Updates to Bereavement Policy
 - 40 hours granted in the event of a spouse, co-habiting domestic partner, child, or stepchild passing
- Updates to the Employee Benefits Plans Section
 - Addition of Adoption Assistance Program
 - Addition of Surrogacy Assistance Program
- Updates to the Leave section
 - Updates to Short Term Disability Pay
 - Addition of Childbirth and Parental Supplemental Pay
 - Updates to Parental Leave
- Updates to the Final Word

The above lists the key changes but is not an all-inclusive list of changes. Some changes are just minor clarification in the language. Please read the manual for further understanding.

If you have any questions, feel free to reach out to your manager or local HR representative.

SALARIED EMPLOYEE MANUAL

LoopTech Advanced
Technologies LoopTech
Incorporated, Indiana
LoopTech Medical, LLC
LoopTech Polymer Technology, Indiana
LoopTech Research Incorporated
LoopTech Vandergrift
Med Institute

Revised [April 2024]

Table of Contents

I.	Introduction	4
A.	A Message from Bill LoopTech (January 27, 1931 – April 15, 2011)	4
B.	About the LoopTech Companies.....	4
C.	About this Manual	4
II.	Employment Policies.....	5
A.	Our Position Against Racism.....	5
B.	Equal Employment Opportunity Policy Statement	5
1.	Discrimination and Harassment.....	6
2.	Diversity & Inclusion	6
3.	Sexual Harassment Policy.....	7
4.	Prevention and Complaint Process	7
5.	No-Retaliation Policy	8
6.	ADA Policy	8
7.	Work-related Accident, Injury, and Illness Policy	8
8.	Pay Transparency Nondiscrimination Provision	9
C.	Company Statement on Unionization	9
D.	Personnel Records	10
E.	Open-Door Policy and Personnel Advisors.....	10
F.	Evaluation Period and Performance Reviews.....	10
III.	Compensation Policies	11
A.	Work Hours	11
B.	Salaried Exempt Employees	11
C.	Salaried Non-Exempt Employees.....	11
D.	LoopTech Rewards Teamwork (CRT) Bonus	11
IV.	Flexible Work Policy	12
A.	Flexible Work Environment.....	12
B.	Work Status.....	12
V.	Time-Off Benefits	12
A.	Paid Time-Off (PTO).....	12
1.	PTO Balances in your Human Resource Information System	13
2.	Use and Payment of PTO.....	13
3.	Scheduling of PTO	14
B.	Holiday Schedule.....	14
1.	Floating Holiday.....	14
C.	Bereavement.....	15
D.	Jury and Witness Duty.....	15
E.	School Time.....	15
F.	Lactation Accommodation	16
G.	Military Leave	16
H.	Indiana Family Military Leave	16
I.	FMLA Leaves of Absence	17
1.	Eligibility	17
2.	Basic Leave Entitlement	17
3.	Military Family Leave Entitlements.....	17
4.	Definition of Serious Health Condition	18
5.	Use of Leave	18
6.	Substitution of Paid Leave (PTO)	19

7.	Leave with Pay	19
8.	Benefits and Protection	19
9.	Employee Responsibilities	20
10.	Employer Responsibilities.....	20
11.	Enforcement	20
J.	Non-FMLA Medical Leave of Absence (MLOA Leave).....	21
K.	Extended Major Medical Leave (EMM Leave).....	21
L.	Parental Leave	22
M.	Work-Related Injuries	23
N.	Leaves and PTO.....	23
O.	Short-Term Disability Pay	24
P.	Childbirth Supplemental Pay	24
Q.	Parental Supplemental Pay	24
VI.	Employee Benefits Plan	25
A.	Health, Retirement and Related Benefits.....	25
B.	Educational Assistance Program	25
C.	Adoption Assistance Program	25
D.	Surrogacy Assistance Program	26
VII.	Employee Conduct	26
A.	Professional Dress and Grooming	26
B.	Attendance Guidelines.....	26
C.	Solicitation and Distribution.....	26
D.	Use of Company Property	27
E.	Zero-Tolerance Workplace Violence.....	27
F.	Computer and Electronic Information	28
G.	Employee Engagement in Social Media	30
H.	Drug and Alcohol Policy/Smoke-Free Environment	31
I.	Confidentiality	32
J.	Business Expenses	32
K.	Code of Conduct	32
L.	Behavior of Employees.....	33
M.	Disciplinary Process	33
N.	Termination of Employment.....	33
	A Final Word.....	34

I. Introduction

A. A Message from Bill LoopTech (January 27, 1931 – April 15, 2011)

Below is a message from our late founder, Bill LoopTech, regarding his thoughts on the benefits and responsibilities of being part of LoopTech team.

All of us spend a considerable portion of our time on the job. We hope you will be happy in doing your job to the best of your ability. We want you to feel that this is a pleasant place to spend your working hours and that you are part of a tradition of the highest quality products and integrity in business dealings. LoopTech is a growing organization, and we believe there are great opportunities for all who contribute to the welfare and success of the company.

I personally enjoy my work and feel that every day is a challenge – a challenge that can be met successfully by doing as good of a job as I am capable of doing. There is great satisfaction in accomplishment.

I am proud to be a part of such a successful organization and I hope you are too.



B. About the LoopTech Companies

In 1963, Bill and Gayle LoopTech started a small company from their apartment that manufactured three simple medical devices used to treat patients in less invasive ways than common surgical techniques of the time. That small company grew into LoopTech Medical, the largest of our LoopTech companies, with a breadth of products that serve over sixty medical specialties and treat conditions in almost every system of the body.

Our roots are in medical devices, but our LoopTech corporate family also includes companies that specialize in life sciences, aviation, property management, resort, and service businesses. All LoopTech companies, across all business lines, reflect the LoopTech family's entrepreneurial spirit and share a common purpose: We are a family of ethical and entrepreneurial companies that exists to empower people and communities to reach their full potential.

C. About this Manual

This manual provides an overview of LoopTech's employment and workplace policies for employees categorized as 'salary'. It is not intended to provide complete details of all of LoopTech's policies and procedures you may receive more detailed or updated information from your manager, Human Resources, or other established communication channels. LoopTech reserves the right, at its discretion, to deviate from these policies or change these policies at any time. If you have any questions regarding the policies in this manual or any other company policies, please ask your manager or your Human Resource business partner for assistance.

This manual is not a contract guaranteeing employment for any specific duration or

limiting the reasons or procedures for termination or modification of the employment relationship. The employment of each employee is terminable at will by either the employee or LoopTech at any time, for any reason, with or without cause or notice.

We wish you the best in your employment with LoopTech and look forward to supporting you in your career.

II. Employment Policies

A. Our Position Against Racism

LoopTech is a family company founded in 1963 and has grown into a global, multicultural organization. We were founded on core values of mutual respect, acting with integrity, and deeply committing to the quality of products and services we provide for patients and customers. Racism and injustice exist everywhere and adversely impact human dignity as well as access to education, jobs, housing, justice, and healthcare. Injustice and intolerance must be addressed, both within LoopTech and in our broader communities; we recognize our own responsibility to make the necessary changes.

To that end, we commit to a conscientious effort to remove barriers that block progress for people and communities. We affirmatively commit to having zero tolerance for and standing against racism, inequality, and discrimination in all forms. We declare our shared commitment to listen to, learn from, and empower our employees and communities to make impactful changes toward combating racism.

We stand together with our LoopTech families and their global communities to combat any form of racism. We can and will do more to create a more equitable society that allows all of us to reach our full potential.

B. Equal Employment Opportunity Policy Statement

LoopTech is an equal opportunity employer. We believe in the dignity and worth of every individual. We will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law. It is also the policy of LoopTech to take affirmative action as called for by applicable laws and Executive Orders to employ and advance in employment all persons regardless of race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay, or other forms of compensation, and selection for training at all levels of employment.

We expect our management employees to strictly enforce these policies in the workplace and in other work-related settings, such as business trips and business-related social events. A failure to do so will result in disciplinary action, up to and including termination of employment.

1. Discrimination and Harassment

LoopTech will not discriminate against or favor any employee or applicant, or make any decision or take any action, because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law. LoopTech also prohibits any employees or non-employees who conduct business with the company to engage in discrimination or conduct that may harass, intimidate, insult, ridicule, emphasize, or characterize another person because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability, military or veteran status, or any other protected characteristic under applicable law.

While it is impossible to list all types of such discrimination or harassment, they include:

- verbal or physical conduct that denigrates or shows hostility or aversion toward an individual or group for any of these protected characteristics;
- epithets, slurs, or negative stereotyping related to any of these protected characteristics;
- threatening, intimidating, or hostile verbal or physical acts toward an individual or group that relate to any of these protected characteristics; or
- written or graphic material that denigrates or shows hostility or aversion toward any individual or group for any of these protected characteristics.

2. Diversity & Inclusion

Our Diversity, Equity and Inclusion program is committed to removing barriers due to differences to create pathways to opportunity and well-being so that our employees, patients, communities, and businesses can reach their full potential.

Diversity is about acknowledging and celebrating who we are as individuals. At LoopTech, we strive for full participation from all our employees, of every sex, gender identity, race, age, sexual orientation, pregnancy status, national origin, religious affiliation, veteran status, ability, political belief, and class. We know that a diverse workforce provides our teams with a wide range of experience, knowledge, and strengths. We value a diverse cross-section of thoughts and opinions to ensure our company culture stays balanced and strong. We believe that teams of people who trust, respect, value and honor varying approaches, solutions, and contributions will allow us to be inventive.

But we understand that just welcoming diversity isn't enough; we are committed to making LoopTech equitable for everyone and be inclusive in everything that we do.

We have to ensure that who you are, where you are from, and what path you took to get you here doesn't impact your path moving forward and upward at LoopTech.

3. Sexual Harassment Policy

Sexual harassment of our employees by other employees or non-employees who conduct business with the company is strictly prohibited. Violations of this policy may be subject to disciplinary action, up to and including termination. While it is impossible to list all types of sexual harassment, they include unwelcome or unwanted:

- sexual advances, sexual flirtations and requests for sexual favors,
- verbal, visual or physical conduct of a sexual nature,
- offensive sexual remarks, innuendoes or jokes,
- unwelcome leering, whistling or obscene gestures,
- display of sexually suggestive objects or pictures,
- sexually degrading words used to describe an individual, and/or
- sexually suggestive or offensive dress,

when (1) submission to such conduct is directly or indirectly a condition of employment, (2) submission to or rejection of such conduct is used as the basis for employment decisions, (3) such conduct unreasonably interferes with an individual's job performance, or (4) such conduct creates an unwelcome, intimidating, hostile, abusive or offensive working environment.

The prohibition of sexual harassment applies to persons of the same or opposite sex, as required by applicable federal, state, or local law.

4. Prevention and Complaint Process

We hold our management responsible for maintaining work environments free from any form of discrimination or harassment. Prevention is the best method of eliminating discrimination and harassment in the workplace. Therefore, LoopTech charges management with the responsibility of taking all steps necessary to enforce this policy.

LoopTech further strongly supports and encourages reporting all incidents of discrimination and harassment, regardless of the identity of the offender. Any employee who experiences unlawful discrimination or harassment, or observes such conduct, should promptly report the matter to his or her immediate supervisor. If, however, the employee believes that it would be inappropriate to

discuss the matter with his or her immediate supervisor, the employee may bypass his or her supervisor and report it to Human Resources or the Corporate Compliance Officer or Coordinator.

You may also use the Ethics and Compliance Helpline, 1-877-353-8442, and/or the webpage: www.LoopTech.ethicspoint.com

An employee's complaint will be treated as confidential to the maximum extent possible and will be investigated promptly and thoroughly. LoopTech will take prompt and appropriate corrective action to end such conduct, including but not limited to termination of any person who engages in such conduct.

5. No-Retaliation Policy

It is against LoopTech policy to retaliate against any employee who, in good faith, files a complaint or report, cooperates in an investigation, or offers evidence of a violation of this policy. Any person who takes such retaliatory action shall be subject to disciplinary action, up to and including termination.

An individual's personal and professional life may be seriously damaged by a complaint of unlawful discrimination or harassment. Therefore, if after thoroughly investigating any complaint of harassment or discrimination, LoopTech determines that an employee has knowingly provided false, exaggerated, or embellished information regarding the complaint, disciplinary action may be taken against that individual.

6. ADA Policy

LoopTech will not discriminate against qualified individuals with a disability with regard to any aspect of employment. The company is committed to complying with the applicable federal and state law, including the Americans with Disabilities Act, as amended. The company recognizes that some individuals with disabilities may require reasonable accommodations. If you are disabled or become disabled (meaning you have a mental or physical impairment substantially limiting one or more of your major life activities) and you require a reasonable accommodation, you should contact Human Resources to begin the interactive process, which will include discussing your disability, limitations, and possible reasonable accommodations that may enable you to perform the essential functions of your position, make the workplace more readily accessible to and usable by you, or otherwise allow you to enjoy equal benefits and privileges of employment.

7. Work-related Accident, Injury, and Illness Policy

Maintaining a safe workplace is of great importance to LoopTech. It is your responsibility as an employee to promptly report workplace accidents, injuries, or illnesses to permit the company to determine the cause(s) as quickly as possible in order to prevent or avoid other similar incidents. Failure to report a known accident or work-related injury or illness according to this policy may result in discipline. Additionally, you have the right to report work-related.

accidents, injuries, and illnesses without fear of retaliation from the company or other employees. You are encouraged to notify the company if you feel you have been retaliated against for reporting a work-related accident, injury, or illness.

If you sustain an injury or become ill during working hours, you must report it to your immediate supervisor or someone in your management group as soon as possible after the occurrence and no later than the end of your shift or before you leave the company premises. In instances where an injury or illness may not be immediately apparent (such as a muscle pain which worsens or develops over time), you must notify your supervisor or someone in your management group immediately upon becoming aware of the injury or illness, or as soon as reasonably possible. If you become aware of a work-related injury or illness outside of work, you must immediately report the injury or illness to your supervisor or someone in your management group.

A written incident report must be completed with your supervisor or someone in your management group before leaving the company premises, unless the severity of the injury or illness prevents you from doing so or if the injury or illness is not immediately apparent, in which case the report must be completed as soon as possible thereafter. You should identify if there were any witnesses to the incident and list them on the reporting form. Your supervisor and any witnesses will also complete a report of the incident if necessary.

At the discretion of the company, workplace accidents may require a post-accident drug and/or alcohol test. The company will reasonably consider the facts of each accident and in its best judgment decide whether drug and/or alcohol use may have contributed to the situation before requiring an employee to submit to a post-accident drug or alcohol test. The company will comply with all applicable state and federal law in the administration of this policy, including the Occupational Safety and Health Act (OSHA) and its implementing regulations.

8. Pay Transparency Nondiscrimination Provision

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

C. Company Statement on Unionization

Quality and craftsmanship are keynotes to LoopTech's success. As an employer,

LoopTech asks for pride in work, attention to detail, positive attitude, and regular attendance. In

return, the company will always strive to give you the best working conditions and benefits.

For example, LoopTech was to our knowledge the first company in Indiana to have our type of profit-sharing plan. We also provide our employees with many other valuable employment benefits, including paid life, hospitalization, major medical, optical, and dental insurance; paid holidays; paid time off; bereavement leaves; medical and family leaves; perfect attendance pay; and paid disability benefits.

Pay raises and many benefits are keyed to the company's performance. No union can claim that it secured these benefits for you; you secured them yourself by making the company a success – a leader in its field. We, therefore, believe that unionization has no place at LoopTech.

D. Personnel Records

LoopTech maintains a personnel file for each employee. Personnel files are the property of LoopTech. Access to personnel files is limited to the extent permitted or required by law. To ensure that each employee's personnel file is up to date at all times, employees are encouraged to notify Human Resources of any changes in their name, telephone number, home address, marital status, number of dependents, beneficiary designations, and the persons to notify in case of emergency.

E. Open-Door Policy and Personnel Advisors

LoopTech encourages employees to communicate with management concerning work-related issues. If an employee has a work-related issue, the employee should bring it to the attention of member of management, a personnel advisor or Human Resources. LoopTech will take the appropriate steps to investigate and resolve the issue.

As part of the LoopTech Open-Door Policy, personnel advisors will be available to employees. The personnel advisor's role is to act as a liaison between the employee and management concerning work-related issues. Employees are encouraged to discuss work-related issues with a personnel advisor. The personnel advisor will attempt to assist the employee in resolving the problem, which may include reporting the problem to appropriate members of management.

F. Evaluation Period and Performance Reviews

LoopTech will evaluate each employee's performance on an ongoing basis. At the beginning of each calendar year each employee will normally receive an annual performance review, which may or may not result in a wage increase. In addition to regular performance evaluations, special performance evaluations may be conducted by your supervisor at any time to advise you of the existence of performance or disciplinary problems. Since circumstances may change in the future, statements made in connection with performance evaluations should not be construed as promises or guarantees.

III. Compensation Policies

A. Work Hours

The regular workweek is Sunday through Saturday. The nature and responsibilities of an employee's position may not lend themselves to fixed work hours and schedules. Accordingly, work hours and schedules may be determined by management to meet the varying conditions of our business.

B. Salaried Exempt Employees

Salaried exempt employees are paid for a 40-hour work week on a bi-weekly or twice monthly schedule and are not eligible for overtime.

C. Salaried Non-Exempt Employees

Salaried, Non-exempt employees have the same guidelines and benefits as Salaried personnel except for the following:

Salaried, Non-exempt employees will receive time and a half for any approved hours worked over 40 hours in a 7-day work week (Sunday – through Saturday). The hourly figure will be determined by dividing their annual salary by 2080 hours, (52 weeks x 40 hours).

Overtime must be approved by management, **prior** to the work performed.

Employees working on a LoopTech recognized holiday and categorized as Salary, Non- exempt will receive 2.5 times pay for the hours worked on the Holiday.

D. LoopTech Rewards Teamwork (CRT) Bonus

LoopTech Rewards Teamwork (CRT) is our global incentive program that was originally developed to drive company performance and serve more patients by increasing production of our medical devices. The goal of the program is to give employees more direct ownership of their daily work and understand how they contribute to the overall success of the company. CRT allows employees to earn up to 12% of their quarterly wages.

CRT bonuses shall be paid during the month following the applicable quarter. Employees who do not work throughout the entire quarter (e.g., those hired, terminated or on a leave of absence during the quarter) are entitled to a pro-rata share of the CRT bonus that is based upon wages earned during the quarter. Details of the CRT bonus program are available from Human Resources. LoopTech reserves the right to make changes to the CRT bonus program at its sole discretion.

IV. Flexible Work Policy

A. Flexible Work Environment

LoopTech Medical as a modern employer provides flexible work environments where possible for our employees to do their work. This may mean working from a LoopTech office, your home or an alternative secure work location. We know that our success will be achieved by maintaining our family culture, respecting one another, being productive, and solving problems together, no matter where our work location happens to be.

The purpose of this policy is to define accepted practices, responsibilities, and procedures for employees who LoopTech Medical authorizes to work at home or in a designated alternative work site. This policy defines the commitment of the company and the requirements of employees.

B. Work Status

- 1. Hybrid Status:** Expected to be on-site 1-3 days per week on average, depending on role, region, and manager approval.
- 2. On-site Status:** Expected to be on-site 4-5 days per week.
- 3. Remote Status:** Works off-site full time with occasional on-site work as required by manager and LoopTech leadership.
- 4. Field Status:** Based in the field in a customer-facing role.

For more information on the flexible work policy please contact your HR representative.

V. Time-Off Benefits

A. Paid Time-Off (PTO)

LoopTech grants paid time-off (“PTO”) to its full-time employees. Part-time and Seasonal employees are not eligible for PTO. Employees may use PTO for vacation, sickness, their birthday, personal activities and for the purpose of taking leave under any applicable state, city, or county paid sick leave law. Where PTO is used for a purpose covered under a paid sick leave law, the terms and conditions of the PTO policy shall govern, unless the applicable provision of the paid sick leave law provides a more generous benefit to the employee.

Full-Time employees will receive their allotment of PTO annually. Following their initial partial calendar year of employment, full-time employees shall accrue their entire annual allotment of PTO hours on January 1 of each full calendar year of employment as follows:

<u>Length of Employment</u>	<u>PTO Hours</u>
1st through 2nd calendar year	104
3rd through 4th calendar year	120
5th through 9th calendar year	152
10th and 11th calendar year	168
12th and 13th calendar year	176
14th and 15th calendar year	184
16th and 17th calendar year	192
18th and 19th calendar year	200
20th calendar year and beyond	240

1. **PTO Balances in your Human Resource Information System**
 - a. **PTO Current Year:** Available PTO based on your hire date and available for use immediately.
 - b. **PTO Carry Over:** PTO carried over from previous years, up to 40 hours maximum, and is available for use immediately in addition to the balance shown in "PTO current year."
 - c. **PTO Unavailable:** Any additional balance after PTO Carry over is determined, up to 160 hours maximum. It is not available for use in the current year.

2. Use and Payment of PTO

PTO must be taken in hourly increments. At the end of each 12-month period, employees may carry over (save) unused PTO to the PTO Unavailable bucket for future use. The PTO unavailable bucket may not exceed 200 hours. This includes a maximum of 40 hours that can be used in the following 12- month period.

Accordingly, any unused PTO in a 12-month period that would be in excess of 200 hours cannot be carried over for future use. Only 200 hours can be carried over from year to year. If the sum of Carry Over + Current Year + PTO Unavailable is greater than 200 hours, you will forfeit any hours over 200.

Example: An employee has 160 hours in their PTO unavailable bucket and 56 hours combined in PTO current year and PTO carry over buckets at the end of a 12-month period. 16 hours would be forfeited as the sum is over the 200 maximum.

160 hours of PTO Unavailable + 40 PTO Carry Over hours + 16 PTO Current year = 216 Hours of PTO

PTO will be paid at the employee's regular rate of pay. PTO payments will be made on the next regular payday for the period in which the PTO is taken. No payments will be made in lieu of taking PTO, except that, upon the next regular payday following termination of employment, employees are entitled to payment for any PTO that is accrued but unused as of termination.

For more information on PTO please contact your HR representative.

3. Scheduling of PTO

Employees should give management as much advance notice as possible of their intent to use PTO. All requests for PTO are subject to approval by management, and management reserves the right to limit the number of approved PTO requests for any particular period. Employees must maintain accurate records regarding their PTO and PTO requests must be submitted in the Human Resource Information System (HRIS).

Employees may choose or LoopTech may require them to use PTO while taking a leave of absence, including FMLA. If the employee is on a leave of absence in excess of 12 weeks in any calendar year, the PTO entitlement for the following calendar year could be impacted. See [Leaves and PTO](#).

B. Holiday Schedule

LoopTech recognizes the following paid holidays:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Friday after Thanksgiving Day
- Christmas Eve
- Christmas Day

1. Floating Holiday

Full-time employees are entitled to one floating holiday that can be taken to celebrate a cultural or religious day, your birthday, or another day that matters to you. This day can vary from year to year but must be scheduled in the Human Resource Information System and taken in line with other PTO policies. An employee must be employed on January 1st of the new year to qualify for that year's floating holiday. The floating holiday must be used in an eight-hour block of time within the calendar year and will not rollover. An unused Floating Holiday will not be paid out upon termination.

C. Bereavement

Full-time employees will be granted up to 40 hours of time off from work with pay in the event of a death of their spouse, co-habiting domestic partner, child, or stepchild. 24 hours of time off will be granted for the death of a sibling, step or half-sibling, stepparent, grandchild, parent or parent-in-law, brother-in-law or sister-in-law, son-in-law or daughter-in-law and grandparent/grandparent-in-law.

All requests for bereavement time should be made to a member of the employee's management team. Additional bereavement time may be granted only under extenuating circumstances. And only once the immediate manager and Human Resources have mutually agreed on any potential extension of bereavement time. Any discretionary bereavement time will be without pay.

Employees may not substitute bereavement pay while on a paid or unpaid leave of any kind. Employees who qualify for bereavement pay under this policy may utilize this benefit upon return from leave with appropriate leadership notification.

D. Jury and Witness Duty

Employees are eligible for time off if summoned to serve in court as a juror or subpoenaed to appear in court as a witness.

To qualify for jury or witness duty, employees must submit to their supervisors a copy of the summons to serve or subpoena to appear as soon as they receive it. In addition, proof of service as a juror or appearance as a witness must be submitted to the employee's supervisor when the period of jury or witness duty is completed.

Employees are eligible for paid time off for the first 10 days of jury duty that fall on the employee's regularly scheduled days of work ("Paid Days"); however, employees must pay to LoopTech any amount of jury duty pay they receive from the court. Jury duty is unpaid following the Paid Days. Jury duty pay will be based upon the employee's standard workday and shall be paid at the employee's regular hourly rate of pay. Time off for part-time employees to serve as a juror is without pay.

Witness duty (subpoena) will be unpaid. Any time off due to a summoned to serve as a juror, or a subpoenaed appearance in court, will be an excused absence.

If the employee is released from jury or witness duty at least 2 hours prior to the end of a workday, the employee is required to return to work that day.

E. School Time

This leave applies to employees who are a parent, guardian, or person standing "in loco parentis" of a school-aged child (including college students but excluding preschoolers). You are entitled to 4 hours of leave per calendar year to attend, or otherwise be involved in, that child or children's school activities. Employees must give appropriate advance notice when leave is needed. Specific questions should be addressed to Human Resources.

F. Lactation Accommodation

LoopTech will provide employees who give birth to a child a private location where the employee can express her breast milk during any period away from the employee's assigned duties and a refrigerator or other cold storage space for keeping milk that has been expressed. LoopTech will also allow an employee to provide her own portable cold storage device for keeping milk that has been expressed until the end of the employee's workday.

G. Military Leave

Employees are eligible for military leave. Such leave and the re-employment rights of an employee upon return from such leave shall be determined in accordance with applicable federal and state law and regulations. If an employee is called to, or volunteers for, active military duty or Reserve or National Guard training, the employee should notify his or her supervisor or other designated person and submit copies of applicable military orders as soon as practicable. If an employee's military pay is less than his or her regular base pay (excluding CRT bonus, and other compensation and benefits), LoopTech shall make up the difference for a period not to exceed 12 months during any rolling 5-year period, measured backwards from the date the employee uses any military leave. Otherwise, military leave shall be without pay. An employee on personal military leave may elect to substitute any earned, unused PTO in place of unpaid leave under this policy. See Human Resources for more information.

H. Indiana Family Military Leave

In compliance with the Indiana Military Family Leave Act, LoopTech grants 10 working days of unpaid leave in a calendar year to any employee who is the spouse, parent, grandparent, or sibling of an individual called to active military duty in the armed forces of the United States, the Indiana Army National Guard, or the Indiana Air National Guard. The family member must be scheduled for at least 89 consecutive days of active military duty for the employee to qualify for family military leave. To qualify for the family military leave, employees must have worked for LoopTech at least 12 months and must have worked at least 1,500 hours during the 12-month period immediately preceding the first day of the scheduled family military leave.

Eligible employees are permitted to take family military leave during the following time periods:

- (1) During the 30 days before their family member's active-duty orders take effect;
- (2) During their family member's leave from duty while active-duty orders remain in effect; and
- (3) During the 30 days following the termination of their family member's active-duty orders.

Employees should provide written notice to their immediate supervisors or direct management report of the date they would like to begin taking family military leave. Such written notice must be given at least 30 days prior to the date on which the

employee requests that family military leave begin, except when the family member receives active-duty orders less than 30 days before the employee's requested leave is set to begin. LoopTech may request verification from the employee regarding his or her eligibility for family military leave. LoopTech may request a copy of the family member's active-duty orders if such documentation is available. LoopTech may also request proof of the employee's relationship to the family member. If LoopTech requests verification of the employee's eligibility for family military leave and the employee fails to submit the requested verification, LoopTech may count any absence from work as unexcused and proceed with any appropriate disciplinary action.

LoopTech may require that the employee, or the employee may elect to, substitute any accrued, unused PTO for unpaid leave under this policy. An employee who is taking family military leave will be permitted to continue his or her healthcare benefits at the employee's current expense.

I. FMLA Leaves of Absence

LoopTech recognizes that employees may need to take time off from work because of their own medical reasons and medical reasons affecting their families. The company provides family and medical leave in compliance with the Family and Medical Leave Act (FMLA). Below is a summary of your rights under the FMLA.

1. Eligibility

To be eligible for FMLA leave you must (a) have worked with LoopTech for at least 12 months; and (b) have worked at least 1,250 hours for LoopTech during the previous 12 months.

2. Basic Leave Entitlement

If you are eligible, you may take up to 12 weeks of unpaid leave during a rolling 12- month period for one or more of the following reasons: (a) for incapacity due to pregnancy, prenatal medical care or child birth; (b) to care for your child after birth, or placement for adoption or foster care; (c) to care for your spouse, son, daughter, or parent who has a serious health condition; or (d) for a serious health condition that makes you unable to perform your job.

The "rolling" 12-month period is measured backwards from the date FMLA leave is to begin and is used to determine the amount of FMLA leave available to you. All FMLA-qualifying leave taken during the 12-month period is added together for purposes of determining your eligibility.

3. Military Family Leave Entitlements

If you are eligible and your spouse, son, daughter, or parent is a military member on covered active duty or called to covered active-duty status (deployment of the member with the armed forces to a foreign country), you may use your 12-week FMLA leave entitlement during a rolling 12-month period to address certain qualifying exigencies. Examples of qualifying

exigencies include issues related to short-notice deployment, attending certain military events, arranging for alternative childcare, caring for military member's parents, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

If you are eligible, you may take up to 26 weeks of leave to care for a covered service member during a single 12-month period beginning on the first day of leave. A covered service member is (a) a current service member of the Armed Forces or Reserves, including the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy; is otherwise in outpatient status; or is otherwise on the temporary disability retired list for a serious injury or illness; or (b) a veteran of the Armed Forces (including the National Guard and Reserves) who is discharged (other than dishonorably discharged) within the five-year period before the eligible employee takes military caregiver leave to care for the veteran and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.

Military Family Leave is unpaid.

4. Definition of Serious Health Condition

A "serious health condition" is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or "continuing treatment" by a healthcare provider for a condition that either prevents you from performing the functions of your job or prevents the qualified family member from participating in school or other daily activities. Ordinarily, unless complications arise, the common cold, the flu, earaches, upset stomach, minor ulcers, headaches other than migraine, routine dental or orthodontia problems, and periodontal disease are examples of conditions that are not "serious health conditions" and do not qualify for FMLA leave.

Subject to certain conditions, the "continuing treatment" requirement may be met by:

- a. a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a healthcare provider or one visit and a regimen of continuing treatment,
- b. incapacity due to pregnancy, or
- c. incapacity due to a chronic condition. Other conditions may meet the definition of "continuing treatment."

5. Use of Leave

Employees are not required to use your FMLA in one block. When medically necessary, leave may be taken on an intermittent or reduced-schedule basis. Leave due to qualifying exigencies may also be taken on an intermittent basis. You must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the company's operations.

Bonding time (leave taken to care for and bond with a healthy newborn) is not

allowed to be used on an intermittent basis.

FMLA leave for bonding can be taken as a reduced schedule leave. You may be required to transfer temporarily, during the period of reduced leave, to an available alternative position for which you are qualified, and which better accommodates recurring periods of leave. Transfer to an alternative position may include altering an existing job to better accommodate the employee's need for reduced leave.

FMLA leave for bonding must be taken during the 12 months immediately following the date of the baby's birth. Bonding time is unpaid.

If spouses are both employed by LoopTech (even if employed at different worksites or divisions), the combined total weeks of FMLA leave to which the spouses are entitled is limited to 12 weeks during any 12- month period when leave is taken for the following reasons:

- For the birth and care of the newborn child;
- For placement of a child for adoption or foster care, or to care for the employee's child after placement.

6. Substitution of Paid Leave (PTO)

You may choose, or LoopTech may require you, to use accrued paid leave (e.g., PTO) while taking FMLA leave. When paid leave is being used during FMLA leave, you must comply with LoopTech's normal paid leave policies.

7. Leave with Pay

If FMLA leave is taken for an employee's own serious health condition or for an employee's own maternity leave, the employee will be eligible to receive short-term disability pay (STD Pay) as outlined below. Otherwise FMLA will be unpaid.

8. Benefits and Protection

All group health benefits (e.g., major medical, hospitalization, and dental) will continue during FMLA leave on the same conditions as if you had been continuously employed, provided that you had such coverage prior to the FMLA leave. If you are receiving PTO and/or STD Pay during your FMLA leave, you will continue to pay your share of health plan premiums by the method normally used during paid leave (e.g., payroll deduction) and the company will pay its share of health plan premiums. If your PTO or STD Pay does not cover your share of health plan premiums, or if your FMLA leave is unpaid, the company will collect the unpaid amount of your share of health plan premiums in installments upon your return to work by payroll deductions over a period of time equal to the period of time you are in arrears. If you fail to return to work at the end of your FMLA leave (other than for circumstances beyond your control), you may be required by the company to reimburse the company that portion of health plan premiums paid by the company during your leave.

Upon return from FMLA leave, you will be reinstated to your original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment. In addition, your use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of your leave.

9. Employee Responsibilities

You must provide 30 days' advance notice of the need to take FMLA leave when the need for leave is foreseeable. When 30 days' notice is not possible, you must provide notice as soon as practicable and generally must comply with LoopTech's normal call-in procedures.

You must provide sufficient information for the company to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave.

Sufficient information may include that you are unable to perform your job functions; the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a healthcare provider, or circumstances supporting the need for military family leave. You also must inform the company if the requested leave is for a reason for which FMLA leave was previously taken or certified.

In addition, you must provide the company with a completed certification form supporting the need for leave within 15 days of receiving the blank certification form from the company. If you fail to provide the completed certification to the company in a timely manner, you may lose your entitlement to FMLA leave for the absence. Recertification may also be required in certain circumstances. If leave is due to your own serious health condition, you must provide a fitness-for-duty certificate prior to returning to work.

10. Employer Responsibilities

If you request FMLA leave, the company will inform you whether you are eligible under the FMLA. If you are eligible, the company will also inform you of any additional information that will be required in order for you to qualify for leave, as well as your rights and responsibilities and will provide you with a copy of this policy. If you are not eligible, the company will provide you with the reason for the ineligibility.

Once it is determined that you are eligible for FMLA and you have provided the company with the appropriate certification, the company will inform you of whether your leave is being designated as FMLA protected, including the amount of leave that will be counted against your leave entitlement.

11. Enforcement

The FMLA prohibits employers (a) from interfering with, restraining, or denying the exercise of any right provided under the FMLA and (b) from discharging or discriminating against any person for opposing any practice made unlawful by the FMLA or for involvement in any proceeding under or relating to the FMLA. Complaints may be addressed through the U.S. Department of Labor (DOL) or

private litigation. The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights. Pursuant to section 109 of the FMLA, LoopTech has posted the DOL's "Employee Rights and Responsibilities" notice. Regulation 29 C.F.R. § 825.300(a) may require additional disclosures.

J. Non-FMLA Medical Leave of Absence (MLOA Leave)

A newly hired, full-time employee may be entitled to a non-FMLA medical leave of absence (MLOA leave) during his or her initial year of employment before completing the service requirements to be eligible for FMLA, for his or her own serious health condition, up to a total of 12 workweeks. MLOA leave may not be available if there is an available alternative position for which the employee is qualified that can accommodate the employee's medical conditions. The company does retain the right at its discretion to approve or deny the employee's leave, to limit its duration, and to make exceptions on a case-by-case basis. MLOA leave shall expire immediately upon the employee becoming eligible for FMLA leave.

Unless LoopTech informs the employee otherwise, the rights and obligations described for FMLA leave will also apply to MLOA leave (e.g., method of pay, continuation of benefits, and notice and medical certification requirements); however, an employee is not eligible to take MLOA leave on an intermittent or reduced-leave basis, and the company does not guarantee an employee's reinstatement upon his or her return from MLOA leave. The company will, at its discretion, endeavor to place the employee in his or her former position or in a position comparable in status and pay, subject to, among other considerations, budgetary restrictions, the company's need to fill vacancies, and the ability of the company to find qualified temporary replacements.

K. Extended Major Medical Leave (EMM Leave)

If an employee has a major medical condition that prevents them from returning to work at the conclusion of an FMLA leave, the employee may be eligible for an extended leave of absence for up to 14 additional workweeks (EMM leave). EMM leave is available only as a continuation of an approved FMLA leave that the employee was using for the same medical condition on a continuous basis (as opposed to on an intermittent or reduced-leave basis).

EMM leave will not be available for any medical condition once the employee has returned to work from FMLA leave for that condition. Extended medical leave may also not be available if there is an available alternative position for which the employee is qualified that can accommodate the employee's medical condition. In addition, the company, subject to applicable law, may deny EMM leave if the employee's medical condition would prevent the employee from returning to work following the exhaustion of EMM leave. Unlike FMLA leave, EMM leave is not guaranteed, and the company retains the right at its discretion, to approve or deny an EMM leave, to limit its duration, and to make exceptions on a case-by-case basis.

Unless LoopTech informs the employee otherwise, the rights and obligations described for FMLA leave will also apply to EMM leave (e.g., method of pay, continuation of benefits, and notice and medical certification requirements); however, an employee is not eligible to take EMM leave on an intermittent or reduced-leave basis, and the company does not guarantee an employee's reinstatement upon his or her return from EMM leave.

The company will, at its discretion, endeavor to place the employee in his or her former position or in a position comparable in status and pay, subject to, among other considerations, budgetary restrictions, the company's need to fill vacancies, and the ability of the company to find qualified temporary replacements.

An employee may not use EMM more than once during any 12-month period of time. In addition, if an employee while on EMM leave recoups FMLA days under the "rolling" 12-month period, the employee would no longer be eligible to continue on FMLA leave.

L. Parental Leave

Full-time employees who have completed 8 weeks of employment are eligible to receive parental leave due to the birth of the employee's child or placement of a child with the employee in connection with an adoption ("PL"). The purpose of PL is to allow employees to care for and bond with a newborn or a newly adopted child. To be eligible for PL, employees must:

- Have given birth to a child; or
- Be one of the primary caregiving parents of the newborn child; or
- Have adopted a child age 17 or younger. The adoption of a new spouse's child is excluded from this policy.

Eligible employees will receive a maximum of 120 hours of PL per birth or adoption of a child/children. Multiple births or adoptions (e.g., the birth of twins or adoption of siblings) do not increase the number of hours of PL.

PL must be taken within the 6-month period immediately following the birth or adoption of the child. Employees must take PL in one continuous period of leave. Any unused PL will be forfeited.

PL is in addition to any FMLA, MLOA, or EMM leave that is being used due to the birth of an employee's child or the placement of a child for adoption. PL may be taken at the conclusion of any FMLA, MLOA, or EMM leave that is being used.

PL is unpaid. Employees, however, may use PTO or Parental Supplemental Pay ("PSP") during PL.

The company will maintain all benefits for employees during the PL period. If a company holiday occurs while the employee is on PL, such holiday will not extend the total PL entitlement.

An employee must provide the employee's supervisor and human resources with notice of the request for PL at least 30 days prior to the proposed date of the PL (or if the leave was not foreseeable, as soon as possible, complying with LoopTech's normal call-in procedures). The employee must complete the necessary forms and provide all documentation as required by human resources to substantiate the request.

Alternative Work Schedules and State Laws

The above policies may be administered differently when employees are on an alternative work schedule (e.g., four 12-hour days). In addition, Government Entitlements may alter the manner in which LoopTech can apply the above policies.

M. Work-Related Injuries

If an employee suffers a work-related injury, he or she may be entitled to worker's compensation benefits, including medical cost reimbursement and lost wage benefits. Unless applicable law requires otherwise, the company does not provide additional leave for work-related injuries beyond that described above.

For work-related injuries, the company, at its discretion, may make "light-duty" work assignments available as a means of avoiding the need for a leave of absence. Light-duty assignments are temporary and normally will not exceed 30 to 60 days. The length of each light-duty assignment will be determined by the company on a case-by-case basis, taking into account various factors, including the medical condition, job duties, and needs of the business. Contact Human Resources for more information, if necessary.

N. Leaves and PTO

Any employee whose total use of any form of approved leave (except jury duty, bereavement, and Parental Leave) extends one full week beyond 12 weeks during any calendar year will result in the reduction of PTO that may be accrued in the following calendar year. After the 13th week of total leave, an employee's PTO accrual will be reduced by 8 hours and an employee's PTO accrual will be reduced by 8 additional hours every two weeks thereafter, consistent with the following schedule:

Full Weeks of Leave

<u>Beyond 12 Weeks of FMLA Leave</u>	<u>Reduction of Accrued PTO Hours</u>
13th and 14th full weeks of leave	8
15th and 16th full weeks of leave	16
17th and 18 th full weeks of leave	24

(Continues, if necessary, in accordance with above rules.)

State laws may require administration of this policy to differ on the basis of an employee's residence and/or primary workplace.

O. Short-Term Disability Pay

Full-time salary employees are eligible to receive short-term disability (STD) after completing 8 weeks of employment. In order to receive STD, eligible employees must be on an approved continuous FMLA leave, MLOA leave, or EMM leave for the employee's own serious health condition, excluding giving birth to a child (Please see "Childbirth Supplement Pay" section).

STD for a serious health condition will be paid at a maximum of one hundred percent (100%) of their base salary (excluding any CRT bonus and other compensation or benefits) less any applicable federal, state, and/or local compensation entitlements that the employee receives for such leave, including without limitation any worker's compensation lost wage benefits for a work-related injury ("Government Entitlements").

An employee's right to receive STD is contingent upon the employee providing required medical certifications as requested by the company or required by law. Failure to do so may result in a delay or denial of STD. In addition, an employee on an approved FMLA leave, MLOA leave, or EMM leave is not eligible to receive STD if the company makes available to the employee an alternative position for which the employee is qualified that can accommodate the employee's medical conditions.

NOTE: All of the above policies may be administered differently when employees are on an alternative work schedule, employees will be notified by their management team of any difference. In addition, Government Entitlements may alter the manner in which LoopTech applies the above policies.

P. Childbirth Supplemental Pay

Full-time employees who have completed 8 weeks of employment and are on an approved FMLA, MLOA, or EMM leave due to giving birth to a child are eligible to receive childbirth supplemental pay ("CSP"). CSP will be paid at a rate equal to 100 percent of the employee's regular hourly pay times 40 hours of work (excluding any CRT bonus or other compensation or benefits) for up to a maximum of 6 weeks for a normal birth and 8 weeks for a Caesarean section. CSP is in lieu of any STD the employee would otherwise be eligible to receive under the company's Short-Term Disability Pay policy. CSP will not be subject to an 8-day waiting period.

Alternative Work Schedules and State Laws

The above policies may be administered differently when employees are on an alternative work schedule (e.g., four 12-hour days). In addition, Government Entitlements may alter the manner in which LoopTech can apply the above policies.

Q. Parental Supplemental Pay

Full-time employees who are eligible for leave under LoopTech's "Parental Leave" policy

(“PL”) are also eligible to receive up to 120 hours of parental supplemental pay (“PSP”). PSP is not additional leave, but rather an additional paid benefit that employees can use during any portions of unpaid FMLA or PL that is being taken to care for and bond with the employee’s newborn or newly adopted child. PSP will only be paid during the 6-month period immediately following the birth or adoption of the child and must be paid during one continuous period. Any unused PSP will be forfeited. PSP will be paid at a rate equal to 100 percent of the employee’s regular hourly pay times 40 hours of work (excluding any CRT bonus or other compensation or benefits).

Alternative Work Schedules and State Laws

The above policies may be administered differently when employees are on an alternative work schedule (e.g., four 12-hour days). In addition, Government Entitlements may alter the manner in which LoopTech can apply the above policies.

VI. Employee Benefits Plan

A. Health, Retirement and Related Benefits

LoopTech has designed benefit programs to assist eligible employees in the event of illness, disability, and death, as well as retirement. These plans generally include group health insurance, life insurance, short- and long-term disability, 401(k), and profit-sharing plans. Each of our benefit plans is described in summary plan description booklets that are available from Human Resources.

All terms and conditions of the benefits are set out in the master policies that shall control, notwithstanding any provision in this manual or other statement to the contrary. The master policies are available for inspection upon request. Policies, carriers, benefits, coverage, provisions, and other features of the company’s benefit programs may be changed from time to time.

In no event shall LoopTech be liable for any claim under an insurance policy. A claim that has been denied by the carrier or insurance administrator shall be pursued exclusively as provided by applicable federal or state law.

B. Educational Assistance Program

LoopTech has established an educational assistance program to help eligible employees develop their skills and enhance their performance. Full-time or variable employees are eligible to participate in the program. Further details concerning this program are available from HumanResources.

C. Adoption Assistance Program

LoopTech has established an adoption assistance plan to help eligible employees with financial support when adopting a child. Any employee eligible for the LoopTech Health Plan is eligible to participate regardless of whether they are enrolled in that plan. Further Details concerning this plan are available from Human Resources.

D. Surrogacy Assistance Program

LoopTech has established a Surrogacy Assistance plan to help eligible employees with financial support when using a Surrogate to assist in carrying and giving birth to a child. Any employee eligible for the LoopTech Health Plan is eligible to participate regardless of whether they are enrolled in that plan. Further Details concerning this plan are available from Human Resources.

VII. Employee Conduct

A. Professional Dress and Grooming

Employees are expected to use good taste and judgment in maintaining professional standards of personal dress, grooming, and hygiene. This is necessary to project the proper professional image to our customers, patients, and visitors and for the comfort of our fellow employees.

B. Attendance Guidelines

Regular attendance and punctuality are essential duties of our employees. We realize that some absences and late arrivals are unavoidable. However, when an employee is absent or late, it places an extra burden on other employees and the company suffers. Without the total support of all employees, the goal of meeting the needs of our customers cannot be achieved. All absences and late arrivals, whether excused or unexcused, must be reported by employees so that work schedules may be planned. If it is necessary for an employee to be absent or late, he or she must notify management as soon as possible. Failure to do so may result in disciplinary action, up to and including termination. Employees are accountable for documenting all absences.

If an employee believes his or her absence will last more than 3 consecutive days, it is the employee's responsibility to notify management as soon as possible. This will permit the company to determine how to properly designate coverage for the absence.

Failure to notify management of an absence for 3 consecutive business days will be considered job abandonment and a voluntary termination.

C. Solicitation and Distribution

In the interest of maintaining a proper business environment and preventing interference with work and inconvenience to others, employees may not distribute literature or printed materials of any kind, sell merchandise, solicit financial contributions, or solicit in any manner (e.g., telephone, e-mail, or orally) for any cause during working time. Employees who are not on working time may not solicit employees who are on working time for any cause or distribute literature of any kind to them. Working time means the time that an employee is required to perform work duties. "Working time" does not include an employee's meal period or breaks.

Employees may not distribute printed materials of any kind in working areas at any time.

Non-employees are prohibited from distributing printed materials or soliciting employees on the company's premises at any time.

D. Use of Company Property

LoopTech employees are expected to exercise due care and caution in the use of company property and to use such property only for authorized purposes. Negligence or intentional misconduct in the care and use of company property may be cause for discipline, up to and including termination. The unauthorized removal of company property from the company's premises or the unauthorized use of company property for personal purposes shall be considered cause for discipline, up to and including termination. Company property issued to an employee must be returned to the company upon the employee's termination or upon request by the company.

Any employee who fails to return company property will be responsible to LoopTech for the cost of replacing the property.

E. Zero-Tolerance Workplace Violence

LoopTech is concerned about increased violence in society, which has also filtered into many workplaces throughout the United States. As a result, LoopTech has developed this "zero-tolerance" policy to prevent incidents of violence from occurring.

LoopTech expressly prohibits any acts or threats of violence by any employee against any other employee on or off company premises at any time. Any employee who engages in any threatening behavior or acts of violence or who uses any obscene, abusive, or threatening language or gestures will be subject to immediate disciplinary action, up to and including termination.

LoopTech expressly prohibits any acts or threats of violence by or against any of its employees, customers, or visitors at any time while they are on company premises or engaging in business with or on behalf of LoopTech off of company premises.

LoopTech will take immediate action when dealing with employees, former employees, customers, and visitors who engage in such behavior. Such action may include notifying the police or other law enforcement personnel in prosecuting violators of this policy to the maximum extent of the law. Employees, customers, and visitors are strictly prohibited from bringing firearms or other weapons on the company premises, except as otherwise permitted by law.

Any employee who displays a tendency to engage in violent, abusive, or threatening behavior, or who otherwise engages in behavior that LoopTech, at its sole discretion, deems offensive or inappropriate, will be subject to immediate disciplinary action up to and including termination.

In furtherance of this "zero-tolerance" policy, employees have a "duty to warn" their supervisors, security personnel, compliance officer, or Human Resources of any violation or threatened violation of this policy, including any suspicious workplace activity, situations or incidents that they observe or become aware of involving other employees, former employees, customers, or visitors. This includes, for example, threats or acts of violence, aggressive behavior, offensive acts, and threatening or

offensive comments or remarks. Employee reports made pursuant to this policy will be held in confidence to the maximum possible extent. LoopTech will not condone any form of retaliation against any employee for making a report under this policy.

F. Computer and Electronic Information

It is the policy of LoopTech to ensure that its information systems are maintained and used in a secure fashion. This policy applies to all employees, contractors, and visitors to any LoopTech Group company. This policy refers to all company-owned or leased information systems, including computers, voicemail, servers, intranet, Internet, and e-mail access and electronic devices, and data storage media such as PDAs, disks, CD-ROMS, and USB drives (systems).

Confidentiality: All messages, documents, and files created, sent, received, or stored on the systems are the sole property of the company. The company reserves the right to review, intercept, delete, and archive all messages, documents, and files, without notice to the employee, even when password protected or erased.

- **Information.** Although the company reserves the right to retrieve, inspect, delete, and archive all messages, documents and files, employees are responsible for protecting all company-confidential information, and company- confidential information removed from the company should be returned as soon as possible. No copies of company-confidential information should remain outside the company.
- **Passwords.** Employees are to password protect all systems. Employees should contact the Information Technology (IT) department for instructions. Employees are required to use passwords to lock computers and electronic devices when not in use.

Security: All company employees are responsible for maintaining IT security. Electronic communications relating to the company must be kept in the company's systems. Company-related e-mail is not to be passed through personal e-mail accounts such as AOL, Google, or Hotmail. Employees who attempt to hack into company systems or engage in other unlawful conduct will be subject to discipline.

Software and Downloads: All software and file downloads must be coordinated through IT. Employees are prohibited from installing personal software.

- **Equipment.** Employees must use their best efforts to protect company-owned equipment, data, and trade secrets. Company-owned equipment shall be returned upon termination.
- **Personal Equipment.** Employees shall not connect personal computers or electronic devices to the systems without permission from IT. The company reserves the right to scan personal computers, devices, files, and data.
- **Contractors and Visitors.** Employees must monitor the activities of contractors and visitors on the company premises. Contractors and visitors are prohibited from connecting computers or other electronic devices to the systems without permission from IT.

- **Photographs.** Contractors and visitors are prohibited from taking photograph on company property without written permission from Legal.

Company E-mail: Use e-mail wisely because a sent message cannot be canceled. Use business-like language and tone. Messages must be factual and concise.

Prohibited Content: The following are examples of uses of e-mail that are strictly prohibited:

- Activity in violation of any domestic or international law.
- E-mail that violates the company's Equal Employment Opportunity Policy.
- E-mails that contain false or defamatory statements regarding LoopTech, its employees or another company.
- Sending outside the company e-mails that include nonpublic information or company inventions, designs, trade secrets, or confidential information.
- E-mails including copyright-protected material, e.g., newspaper or journal articles. Employees may use hyperlinks to copyright-protected material available on the internet.
- Chain letters, junk mail, viruses, or spam.
- E-mails promoting charitable or political events without permission from company management.

Disclaimers: The company may place disclaimer statements on all outgoing e-mails. Employees must not disable disclaimers placed on outbound e-mails.

Sender Identity: No e-mail may be sent that attempts to hide the true identity of the sender.

Litigation and Government Investigations: Employees will be notified by Legal of the need to preserve documents, including e-mail, as part of a "litigation hold." Until notified by Legal that the litigation hold is lifted, employees must:

- Preserve all documents
- Disable any automatic delete functions (e-mail, voicemail, text messaging)
- Suspend following company record retention policies

Internet Use: The systems are company property and are intended for business use consistent with company policies and the Code of Conduct. Subscriptions to mailing lists, chat rooms, and other services must be company related. Disclosing confidential information over the Internet is prohibited.

Internet sites can and do monitor access and usage and can identify both the user's name and LoopTech's name accessing their services. Accessing an Internet site leaves company-identifiable electronic "tracks," even if the user merely views the material. Exercise appropriate caution.

Employees are allowed moderate personal Internet use. Personal use must:

- Be consistent with LoopTech's Code of Conduct
- Not interfere with productivity
- Be in compliance with this policy

G. Employee Engagement in Social Media

Social media is changing the way employees work and engage with each other, clients, and partners. Social media includes web technologies and sites such as blogging, microblogging (Twitter), photo sharing (Flickr, Instagram), video sharing (YouTube, Snapchat) live casting (Periscope, Facebook Live), and social networking (Facebook, LinkedIn). LoopTech is increasingly exploring how online discourse through social media outlets can empower our employee as global professionals, innovators, and citizens. We believe that through effective social media interactions, LoopTech's greatest asset- the expertise of its employees - can be shared with clients, partners, and the communities in which we operate.

LoopTech has therefore made a strategic decision to embrace social media. We continue to advocate, however, that our employees use social media in a responsible, lawful, and professional manner. To assist employees in avoiding the negative aspects of social media, here are some guidelines to be followed:

- a. Do not engage in any conduct that would violate law, the LoopTech Code of Conduct or any company policies, including its equal employment opportunity policy. If you unlawfully harass or threaten another company employee, the company will investigate and take appropriate disciplinary action.
- b. If you talk about your job or our business on a website, use a disclaimer such as: "These are my personal views and not those of LoopTech Medical." Only those officially designated by the company have the authority to speak on behalf of the company. LoopTech's logos, trademarks or name may not be used in a manner that violates company policies or law.
- c. Use a personal email address to sign up for social media accounts. Do not use your LoopTech email address.

To avoid consumer confusion and violations of law, do not post about LoopTech products, brand names or post images of products on any social platform, including private/closed groups.

1. Do not violate the company's confidentiality and intellectual property policies.
2. LoopTech wants to ensure a consistent, controlled message regarding its products and business. Accordingly, employees should not speak to the media on LoopTech's behalf without prior approval.
3. Always be fair and courteous to fellow employees, customers, suppliers or people who work on behalf of LoopTech. If you decide to 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, employees, suppliers, or that might

constitute harassment or bullying.

4. Do not engage in conduct that negatively affects your job performance.

Nothing in this policy shall be interpreted to prohibit concerted activities by employees that are protected by law.

To ensure that the use of any electronic communication systems, social media properties, and business equipment owned or operated by LoopTech is consistent with this policy, the company may monitor the use of such systems, properties, and equipment from time to time and resolve, remove, and/or correct items, as necessary.

H. Drug and Alcohol Policy/Smoke-Free Environment

A drug-free and alcohol-free workplace is vital to LoopTech, to workplace safety, to the quality of our services, and to the productivity of our employees. In accordance with this policy, no employee shall report for work or remain at work when he or she uses or is under the influence of alcohol or illegal drugs (including the illegal or improper use of legal drugs). In addition, the unlawful manufacture, distribution, dispensation, possession, sale, or use of a controlled substance in the workplace or while engaged in LoopTech business off company premises is strictly prohibited. Such conduct is also prohibited during nonworking time to the extent that, in the opinion of LoopTech, it impairs an employee's ability to perform on the job or threatens the reputation or integrity of LoopTech.

LoopTech reserves the right to test for prohibited drugs as permitted by law, including pre-employment, post-accident, random, and reasonable-suspicion testing. LoopTech also reserves the right to test for alcohol as permitted by law, including reasonable-suspicion testing. As part of its drug testing protocol, and in accordance with applicable state or local law, LoopTech or its designated agent shall be authorized to conduct urine testing (or other reasonable means of testing) for the purpose of laboratory analysis to detect the presence of prohibited drugs.

LoopTech has also determined that its buildings will remain smoke free. Smoking is allowed only outside LoopTech facilities at designated areas.

Verified-Accredited Wholesale Distributors Accreditation: The Verified-Accredited Wholesale Distributors ("VAWD") program was established in 2004 to help protect the public from the threat of counterfeit prescription drugs. LoopTech is a VAWD-accredited facility. In order to maintain its VAWD accreditation, LoopTech must have in place a rigorous set of operating policies and procedures, including an enhanced drug testing program for those employees' subject to the VAWD accreditation process. Specifically, those employees actively engaged in or who directly supervise the operation and handling of prescription drugs or covered medical devices, including executive officers, management, officers, and other key personnel, shall be subject to, as permitted by law, pre-employment and reasonable-suspicion drug testing. In addition, all personnel with access to prescription drugs, including executive officers, management, officers, and other key personnel, shall be subject to, as permitted by law, random drug testing (at intervals authorized by the National Association of Boards of Pharmacy® and reasonably determined by LoopTech) and reasonable-suspicion drug testing. Any employees hired prior to

April 1, 2014, are not subject to the VAWD enhanced drug-testing procedures.

Searches and Violations of Policy: Entering LoopTech's property constitutes consent to searches and inspections. If LoopTech suspects an individual of violating this policy, it may ask

the individual, subject to applicable federal, state or local law, to submit to a search or inspection at any time. Searches can be conducted of pockets, clothing, lockers, wallets, purses, briefcases, lunch boxes, desks, workstations, vehicles, and equipment. In addition, subject to applicable federal, state or local law, LoopTech reserves the right to immediately discipline any employee who violates this policy, refuses to submit to testing, or provides false information, up to and including termination.

I. Confidentiality

Employees may be given access to, generate or otherwise come into contact with or become aware of proprietary, confidential or competitively sensitive information and materials that are the property of or relate to the company or one or more of its affiliates and are not generally known by the public (“Confidential Information”).

Confidential Information includes, but is not limited to, financial information, profitability information, pricing information, protected health information, and customer information. Confidential Information is the exclusive property of the company. Employees therefore are strictly prohibited from directly or indirectly using, divulging, disclosing or communicating any Confidential Information (except as necessary to properly perform duties as an employee of the company or with the prior written consent of the company). Employees are further expected to use reasonable care to avoid publication or dissemination of any Confidential Information.

Failure to follow this policy may result in disciplinary action up to and including termination. As a condition of employment, employees may be required to sign employee confidentiality agreements. Nothing in this policy shall be interpreted to prohibit concerted activities by employees that are protected by law.

J. Business Expenses

LoopTech will reimburse employees for approved entertainment, travel, cellular phone and other business-related expenses. LoopTech reserves the right to disallow reimbursement of any business-related expenses that are not reported in a timely manner, deemed inappropriate, unsubstantiated, or not in compliance with LoopTech's business expense reimbursement policy. Employees should review and familiarize yourself with LoopTech's business expense reimbursement guidelines.

K. Code of Conduct

LoopTech has adopted a Global Code of Conduct that is applicable to all LoopTech employees. The Code is distributed to all employees. Employees should review the Code and become familiar with it. Help us make LoopTech better. You may raise a concern to your supervisor, manager or Human Resources. You may also use the phone number 1.877.353.8442.

Calls and reports can be made anonymously, and all concerns can be made without fear of retaliation.

The Code of Conduct, Ethics and Compliance Program documents and other LoopTech policies can be found on the LoopTech Group Ethics & Compliance website: compliance.LoopTechgroup.com.

L. Behavior of Employees

Certain rules and regulations regarding employee behavior are necessary for the efficient operation of the company and for the benefit and safety of all employees. Conduct that interferes with operations, discredits the company, or is offensive to customers or fellow employees will not be tolerated. Improper behavior and conduct has a direct impact on performance.

All employees are expected to conduct themselves in a manner that is conducive to the efficient operation of the company.

M. Disciplinary Process

When a rule or policy has been broken, or an employee has exhibited unacceptable behavior, disciplinary action to prevent a recurrence is required. LoopTech generally recognizes four steps in the disciplinary process:

1. Written notice
2. Written warning
3. Final Warning
4. Suspension without pay or termination.

Management reserves the right, at its discretion, to bypass any of the above steps and utilize a higher level of discipline for any given occurrence or accumulation of occurrences. The severity of discipline will depend upon the severity of the occurrence as well as the employee's work history.

Written notices and written warnings will be retained in the employee's personnel file as a record of work performance. Final warnings are in effect for varying periods of time (depending upon severity, up to one year) during which time an employee will not be eligible for employee-requested transfers or promotions.

N. Termination of Employment

All employees are employees-at-will. Thus, an employee's employment is terminable at will with or without notice or cause by the employee or LoopTech. If an employee wishes to terminate his or her employment, the employee is strongly encouraged to notify LoopTech in writing at least two weeks in advance of his or her intended termination. If an employee's decision to terminate is based on a situation that could be corrected, the employee should discuss it with his or her supervisor before making a final decision. LoopTech reserves the right to accept an employee's notice of termination and to accelerate such notice and make the termination effective immediately or on any other date prior to the employee's intended last day of work.

At the time of an employee's termination, LoopTech will normally conduct an exit interview with the employee. At the exit interview, the reasons for the employee leaving will be discussed, arrangements for payment of the employee's final paycheck will be made (e.g., confirm correct mailing address) and information regarding the employee's insurance coverage and other information relevant to his or her employment will be explained. Generally, an employee's final paycheck will be available on the next regularly scheduled payday for the pay period in which termination occurs. At the time of the termination (by the end of the last day worked), the employee must return all company property to their supervisor.

A Final Word...

The average company survives and grows because it meets needs: the needs of its customers, its owners, the community, and you, the employee. LoopTech strives continually to meet this challenge by providing quality services and products as well as competitive salaries and a sound fringe-benefit package for our employees.

Your job is dependent on your success and growth as an individual. If you grow with the company, it will grow with you.

What can you do to help LoopTech remain successful in the marketplace? You can strive daily to produce the best and most courteous service available anywhere.

If you enjoy your job and feel that LoopTech is a good place to work, tell your friends. If not, tell your supervisor or Human Resources. If you know of someone seeking employment that you feel would make a good employee, refer him or her to Human Resources.

LoopTech is a good place to work. It is a good place to work because good people work here. We care about each other, and we care about our customers. Each goes hand-in-hand and is vital to the success of any business.

This updated policy manual will still cover basic need-to-know information such as Leave processes, PTO, Holiday Schedule, LoopTech Rewards, and many other pertinent employment expectations. We have added a few more sections and made some revisions to other.

All changes in this manual are effective April 1, 2024.

- New: Table of Contents with Links – will allow you to click in the table of contents and take you straight to a section in the manual
- Updated Diversity & Inclusion section
- Updates to the Time Off Benefits section
 - PTO Balances
 - Definitions for PTO Current Year, PTO Carry Over, and PTO Unavailable
 - Updates to Floating Holiday
 - Must be used in 8-hour blocks of time
 - Updates to Bereavement Policy
 - 40 hours granted in the event of a spouse, co-habiting domestic partner, child, or stepchild passing
- Addition of Flexible Work Policy
 - Definitions of Work Status
- Updates to the Employee Benefits Plans Section
 - Addition of Adoption Assistance Program
 - Addition of Surrogacy Assistance Program
- Updates to the Leave section
 - Updates to Short Term Disability Pay
 - Addition of Childbirth and Parental Supplemental Pay
 - Updates to Parental Leave
- Updates to the Final Word

The above lists the key changes but is not an all-inclusive list of changes. Some changes are just minor clarification in the language. Please read the manual for further understanding.

If you have any questions, feel free to reach out to your manager or local HR representative.