

## Get Profile Badge ID

## Share Room Badges

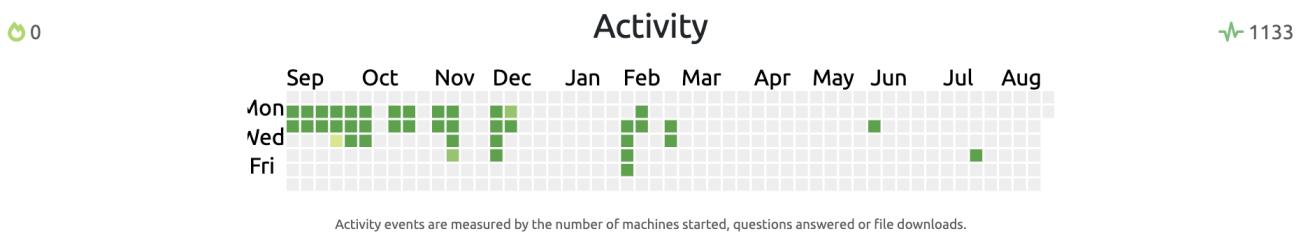
## Rooms Complete

## Badges

## Created Rooms

## Yearly Activity

## Tickets



# Exfil Security

# Employee Handbook

As of 16 Aug 2021

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## **SECTION 1 - Introduction**

### **1.1. Welcome and Company Description**

Welcome to Exfil Security! Thank you for joining our company! You have a great opportunity to make a significant contribution to the security industry by way of Exfil Security, LLC. We hope you find your employment at Company a rewarding experience. We look forward to working together to create a more successful company.

You have joined an organization that has established an outstanding reputation for quality. Credit for this goes to everyone in the organization. We hope you will find satisfaction and take pride in your work here. As a member of Exfil Security's team, you are expected to contribute your talents and energies to further improve the culture and quality of the company.

This Employee Handbook provides answers to many of the questions you may have about Company's benefit programs and company policies and procedures. You are responsible for reading and understanding this Employee Handbook. If anything is unclear, please discuss the matter with the Chief Operating Officer (COO).

I extend to you my personal best wishes for your success and happiness at Exfil Security!

Chris Butler  
Principal – VP Operations  
Exfil Security, LLC

**Company Description.** Exfil Security, LLC is an S Corporation in Colorado. It is a boutique cyber security company that prepares solutions to small and medium size business to address their security and compliance requirements through advanced assessments, compliance reviews and programmatic solutions. Our team is made up of lifetime experts in the tools, techniques and procedures needed to run successful information security management programs. We possess experience across multiple cyber security domains, from all levels of management, and from all sides of the table – blue/defense, red/offense and purple/threat intelligence. This uniquely enables us to help organizations run effective security programs while providing a balanced business solution to reduce overall risk.

### **Introduction to Handbook**

It is our pleasure to issue to you a copy of our Employee Handbook containing information that will assist in answering your questions regarding our policies and benefits. Please do not hesitate to request clarification on any item which you do not understand. The Company may alter or amend the policies and provisions contained in this handbook at any time, at its discretion. As changes occur, we will let you know.

This handbook has been written to provide guidance and to help you get to know more about the Company. Not all Company policies and procedures are set forth in this handbook. We have summarized only some of the more important ones. Brief outlines of the benefits, salary plan, rules and regulations, etc., are contained for review. For more detailed information on any of these subjects contact the VP of Operations. **THIS HANDBOOK IS NOT A CONTRACT. THE BENEFITS,**

POLICIES AND PROCEDURES OUTLINED IN THIS HANDBOOK ARE SUBJECT TO CHANGE AT ANY TIME, AT THE SOLE DISCRETION OF THE COMPANY. This handbook does not make any enforceable promises or guarantees.

Notwithstanding any statements made in this handbook or any employment-related discussion, it is understood that all employees at the Company are employed on an at-will basis and may resign or be terminated at any time.

## **Hiring and Employment Generally**

### **Employment At-Will**

All employees at the Company are at-will employees. This means that employment may be terminated with or without cause and with or without notice at any time by the employee or the Company. Nothing in these guidelines or in any document or statement shall limit the right of the Company or the employee to terminate employment at-will. No manager, supervisor, or employee of the Company may enter into any agreement for employment for any specified period of time or make any agreement, implied or expressed, for employment other than on an at-will basis. Only the CEO of the Company has the authority to make any such agreement and then only in writing.

## **Types of Employees**

Employees at the Company are classified as full-time non-exempt, part-time non-exempt, temporary, or exempt.

### **Full-Time Non-Exempt Employees**

Full-time non-exempt employees are those who are normally scheduled to work and who do work a schedule of 40 or more hours per week. Full-time non-exempt employees are eligible for all employee benefits described in this handbook.

### **Part-Time Nonexempt Employees**

Part-time non-exempt employees are those who are scheduled to and do work less than 40 hours per week. Part-time non-exempt employees may be assigned a work schedule in advance or may work on an as-needed basis. Part-time non-exempt employees are not eligible for employee benefits, except as required by applicable law.

### **Temporary Employees**

Temporary employees are those who are employed for short-term assignments. Short-term assignments will generally be periods of 6 months or less. Temporary employees are not eligible for employee benefits, except as required by applicable law, and may be classified as exempt or non-exempt on the basis of job duties and compensation.

### **Exempt Employees**

Exempt employees are those whose job assignments meet the federal and state requirements for overtime exemption. Exempt employees are compensated on a salary basis and are not eligible for overtime pay. Generally, executive, administrative, professional and certain sales employees are overtime exempt. Exempt employees are eligible for all employee benefits described in this handbook.

## **Job Duties**

Your manager will explain your job responsibilities and the standards which will be expected. Because flexibility is necessary, your job responsibilities may change at any time during your employment. One of the most important job duties of all Company employees is the expectation that you will maintain loyalty to the Company. As part of your job, you are expected to perform all duties and assignments with the Company's legitimate business interests in mind. You are also expected not to take any actions that would directly conflict with the Company's legitimate business interests.

In addition to your regularly assigned job responsibilities and duties, from time to time, you may be asked to work on special projects or to assist with other work important to the operation of your department or the Company. Your cooperation and assistance in performing additional work is expected. The Company reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions, or assign additional job responsibilities.

## **Performance Evaluations**

Your manager will periodically review your performance and discuss the review with you. The frequency of performance evaluations may vary depending upon, among other things, length of service, job position, past performance, changes in job duties or recurring performance problems.

Your performance evaluations will include a review of the quality and quantity of the work you perform, your knowledge of your job, your initiative, your work attitude and your attitude towards others. The performance evaluation should help you become aware of the progress you are making, the areas in which you need to improve, and objectives or goals for future work performance. The appraisal will be retained in your personnel file.

Salary increases and promotions are solely within the discretion of the Company and depend upon many factors in addition to your individual performance.

## **Personnel Files**

Personnel records for each employee will be maintained by the Company. The records may include reference checks, evidence of prior compensation levels, performance appraisals, and any other documents relevant to the employee's employment. Employees may review their personnel files after making a written request to the VP of Operations.

## **Changes in Personal Data**

It is the employees' responsibility to notify the VP of Operations of the following:

- Change of address or telephone number;
- Legal change of name;
- Change of status regarding legal right to work; and
- Beneficiary change.

## **Wage and Hour Policies for Exempt Full Time Employees**

### **Hours of Work and Workday**

The regular paid workday for Company Employees will be eight hours. Each employee is entitled to an unpaid one hour lunch break.

## **Workweek**

A standard work week of Exfil Security is 40 hours. The week begins at 12:00 a.m. Sunday and ends the following Saturday at midnight.

Normal workdays are 0800 through 1700, forty (40) hours per week but may be adjust based client locations.

## **Payroll Deductions**

The amount of your paycheck is not the full amount of wages which the Company pays you. Part of your pay comes in the form of deductions, and will be set aside either to meet government requirements or for specific purposes authorized by you.

Keep your check stub or statement – it shows the amount of your earnings for the pay period, accumulated earnings for the year, deductions made, and other important information. For income tax purposes, the Company will provide you and the Internal Revenue Service a statement of your yearly earnings and taxes withheld. This statement is known as the "W2 Withholding Statement" and will be issued to you sometime in the month of January.

### **Mandatory Deductions**

The Federal Income Tax law requires that an employer withhold income taxes on wages earned. It also requires that taxes be withheld from overtime and other additional payments. Under provisions of the Federal Insurance Contributions Act (FICA), you and the Company contribute on an equal basis to provide for your retirement and for your dependents, in the event of your death or disability. Your share of this contribution is handled by payroll deductions. State taxes are also withheld.

### **Voluntary Deductions**

You may have certain additional deductions made from your paycheck, such as a contribution to United Way Fund, if you desire. The Company reserves the right to limit the number and type of voluntary deductions an employee may make.

### **Improper Deductions**

Under certain conditions, the law permits employers to make deductions from the wages of its employees. The Company will make deductions from the wages of its employees only as permitted by law. Making improper deductions from the wages of employees is strictly prohibited.

Despite our best efforts to prevent improper deductions, however, it is possible that mistakes may be made. Any employee who believes that a deduction has been taken improperly from his or her paycheck should immediately report his or complaint or concerns to the VP of Operations. Every effort will be made to ensure that complaints will be investigated and resolved promptly. If Company determines that a deduction was taken improperly, Company will reimburse the affected employee for the improper deduction. All employees may file complaints or raise concerns regarding deductions from wages without fear of reprisal.

We are committed to preventing improper deductions. Managers and supervisors who are uncertain about whether a deduction is proper should seek guidance from the VP of Operations before making or ordering the deduction. Managers and supervisors who knowingly make or authorize improper deductions are subject to disciplinary action, up to and including termination.

## **Garnishments and Attachments**

Attaching part of an employee's wages for the debts owed to others is an unpleasant proceeding. You should make every effort to keep your private financial situation from involving the Company.

## **Compensation / Salaried Employees**

Salaried employees will receive the same amount of pay each pay period, no matter how many hours they work. Salaried employees will be paid on a Monthly basis, on/about the 15th of the month.

## **Compensation / Hourly Employees**

Hourly employees will be paid a set amount per hour. Hourly employees will be paid on a monthly basis on or about the 15<sup>th</sup> of the month. Time Sheets must be submitted by the 3<sup>rd</sup> of each month.

## **Overtime**

As necessary, employees may be required to work overtime. A manager must previously authorize all overtime work. The Company provides compensation for all overtime hours worked by non-exempt employees in accordance with state and federal law. Exempt employees are expected to work as much of each workday as is necessary to complete their job responsibilities. No overtime or additional compensation is provided to exempt employees. For overtime purposes, our work week begins at 12:01 a.m. on Sunday and ends at midnight on the Saturday of the same week.

## **Immigration Compliance**

The Company will comply with applicable immigration law, including, but not limited to, the Immigration Reform and Control Act of 1986 and the Immigration Act of 1990. As a condition of employment, every individual must provide satisfactory evidence of his or her identity and legal authority to work in the United States.

## **Workers Compensation**

Employees are covered by workers' compensation pursuant to Colorado. Anyone injured at work must report the injury to his/her manager or department head immediately.

## **Paid Time Off (PTO)**

The Company values the hard work of employees and believes that employees deserve and need time off. PTO will not be accrued but shall be granted as work schedules allow and at the discretion of your manager. Enter PTO requests in the Company vacation calendar with enough notice to work it out with your manager so that the work we need to do gets done. Since vacation time is not accrued, there are no carry over days and there are no payouts.

Please note that unless pre-approved by your manager, after you have been absent for one week (5 work days) or more you will be considered to be on an unpaid leave of absence.

## **Holidays**

The Company will be closed in observance of the following national and state legal holidays:

### **Legal Holidays**

New Year's Day	January 1st
Martin Luther King Jr. Day	3rd Monday in January
Memorial Day	Last Monday in May
Independence Day	July 4th
Labor Day	1st Monday in September
Thanksgiving Day	4th Thursday in November
Day after Thanksgiving	
Christmas Day	December 25th
Presidential Election Day	Presidential Election Year

***The Company will be also closed in observance of the Marine Corps Birthday, November 10th.***

When a holiday falls on a Saturday or Sunday, it is usually observed on the preceding Friday or the following Monday. However, the Company may recognize the holiday on another day or grant individual days instead of closing. Holiday observance will be announced in advance. Part Time and Temporary employees will not be entitled to holiday pay.

### **Attendance**

#### **Attendance Generally**

The Company's successful operation depends in large part upon the regular and punctual attendance of each of its employees. You have an important job which fits into the pattern of company operations. Absences are undesirable because they affect your fellow employees and the company's customers.

### **Earned Paid Sick Time Policy**

#### **Accrual of Sick Time**

If you're sick, we understand, please stay home and feel better. Just let your manager know. Full-time employees are allowed six (6) paid sick days per calendar year. A note from your doctor may be requested for prolonged illnesses. Unused sick days may not be carried over from one calendar year to the next, and no payments will be made for accrued but unused sick days at the end of any calendar year or in the event of termination.

Sick time is provided to allow employees to:

- care for employee's own physical or mental illness, injury, or other medical condition that requires home, preventative or professional care;
- care for a child, parent, spouse, or parent of a spouse who is suffering from a physical or mental illness, injury, or other medical condition that requires home, preventative or professional care;
- attend routine medical and dental appointments for themselves or for their child, parent, spouse, or parent of a spouse;
- address the psychological, physical, or legal effects of domestic violence; and

- travel to and from an appointment, a pharmacy, or other location related to the purpose for which the time was taken.

Use of sick time for other purposes is not allowed and may result in an employee being disciplined.

### **Absence Notification Procedures**

If the need for sick time use is foreseeable, an employee must provide reasonable advance notification to their supervisor of any absence from work. If the use of sick time is unforeseeable, an employee must provide notice to their supervisor of the need to use sick and safe time as soon as practicable. In all circumstances, an employee is responsible for specifying if the time off is for sick time reasons, so that the absence may be designated as a sick time absence. Failure to obtain approval as soon as possible after determining the need to take sick time may result in discipline. All sick time pay will be computed at the employee's regular rate of pay, as defined under this policy. Sick and safe time cannot be carried over at the end of one year and into another.

### **Verification of Use of Sick Time**

The Company will generally require an employee to submit a health care provider's note or other documentation to support the use of sick time for prolonged illnesses. :

In cases where the Company has a reasonable belief that the employee's return to work could present a significant risk of harm to the employee or others, the employee may be required to provide a fitness for duty certificate prior to returning to work.

### **Company Expectations Regarding Attendance**

Employees should remember that regular, reliable attendance and timeliness is expected. If an employee is repeatedly absent, late or leaves work early for reasons not covered by earned sick time, is absent or tardy for more than forty (40) hours in a year, commits fraud or abuse by engaging in an activity that is not consistent with allowable purposes for sick time or exhibits a clear pattern of taking sick time on days just before or after a weekend, vacation or holiday, the employee may be subject to disciplinary action.

### **Payout of Sick Time**

Sick time is not payable on termination of employment.

### **Interaction with Other Types of Leave**

If any time off covered under this policy is also covered under the Company's FMLA, Parental Leave, Domestic Violence Leave, SNLA leave or other leave of absence policies, sick time shall run concurrently with such leave. Employees may choose to use, and the Company may also require employees, to use earned sick time to receive pay for absences under other leave policies if those absences would otherwise be unpaid.

### **Snow/Weather Emergency Days**

During inclement weather when the Company is open for business, all employees are expected to be at work on time or as soon thereafter as possible. If an employee is unable to come to work, the employee must notify the Department Supervisor, and take the day as a vacation day.

### **Leaves of Absence**

## **Generally Requesting a Leave of Absence**

An employee seeking a leave of absence must submit a written request for leave to his or her supervisor. The request for leave must include:

- Name of employee;
- Name of supervisor;
- Date of request;
- Reason for leave (please provide specifics);
- Anticipated timing and duration of leave; and
- Signature of employee.

Employees must provide thirty (30) days' advance notice of the need to take a leave of absence when the need is foreseeable. When thirty (30) days' notice is not possible, the employee must provide notice as soon as practicable, which should be on the same day or next business day of the date the employee becomes aware that the leave is needed. In all cases, employees taking a leave of absence are expected to comply with the Company's normal call-in procedures for taking time off. Employees who provide less than thirty (30) days' notice are required to provide an explanation as to why they were unable to do so. Employees who fail to meet these notice requirements may be denied leave.

## **Employee Obligations During a Leave of Absence**

Employees on a leave of absence are required to report to the Company periodically (at least every two (2) weeks) regarding their status and intention to return to work. Employees on a leave of absence in a location other than their regular residence must provide the Company with a mailing address and telephone number where they can be reached. If an employee on leave fails to respond to written communications from the Company, the employee may be deemed to have resigned.

Employees on a leave of absence are not permitted to hold outside employment or consulting jobs without the written permission of the Company.

An employee returning from a leave of absence due to a serious health condition will be required to present a fitness-for-duty certificate prior to being restored to work.

## **Benefits and Compensation During Leave**

An employee's eligibility for continued compensation and benefits during a leave of absence will depend on the type of leave. See specific leave policies for more information. In most instances, employees on an approved leave of absence of more than \_\_\_\_\_ (x) days are not eligible to accrue vacation or sick time during the leave.

## **Military Leave**

Employees who are required to serve a period of time in a reserve component of the U.S. Armed Forces are allowed an unpaid leave of absence. All employees (except those with jobs that are for a brief, non-recurrent period with no reasonable expectation the job will continue indefinitely or for a significant period), regardless of length of service, are entitled to reserve duty leave.

There will be no loss of seniority-based benefits during military leave.

Continuation of coverage under the Company's health care plan during military leave depends on the length of the leave. For leaves of absence less than thirty-one (31) days in duration, the Company will continue to pay its share of the health care premium contribution, and the employee will be responsible for his/her own share. For leaves of absence greater than thirty-one (31) days, a covered employee may elect to continue health plan coverage at his/her own expense for a period of up to twenty-four (24) months. For more information concerning health care coverage during leave, please see the Human Resources Department.

An employee requesting military leave must request the leave as soon as the need for leave becomes known. A copy of the orders to go to the reserves must accompany the request for the leave.

An eligible employee may also be able to take FMLA leave in connection with certain situations related to military service: (i) an eligible employee may take up to twenty-six (26) weeks of leave during a single twelve (12)-month period to care for a covered family member who has suffered a qualifying injury or illness in the line of active duty in the Armed Forces; and (ii) an eligible employee may take up to twelve (12) weeks of leave during a twelve (12)-month period in connection with a 'qualifying exigency' arising out of a covered family member's active duty or call to active duty in the Armed Forces in support of a contingency plan.

### **Jury Duty Leave**

If you are called for jury duty you must submit the jury notice or subpoena with the request for the leave. The employee must notify the Company as soon as dates of jury duty are known. If jury duty falls at a time when the Department is particularly busy, the court may allow the jury duty to be rescheduled to a more convenient time.

An employee on leave of absence for jury duty is entitled to receive his or her regular pay, less the amount received from jury duty, for up to (five or as required by law) days of service. The employee must submit the record of jury fees before receiving his or her regular pay.

The employee is expected to report to work during the hours his/her presence is not required as a juror. Jury duty will not affect the employee's attendance record.

### **Bereavement Leave**

Regular full-time employees are entitled to up to three (3) days paid leave in the case of death in the employee's immediate family. Immediate family is defined to include parents, spouse, domestic partner, children, brothers and sisters, grandparents, grandchildren, mother-in-law or father-in-law. Regular full-time employees are entitled to up to one (1) day paid leave in the case of death in the spouse's immediate family. Additional unpaid leave may be authorized by the Company. Bereavement Leave will not apply in the event the death in the family occurs when the employee is not scheduled to work, such as being on vacation or on an approved leave of absence.

### **Family and Medical Leave Act (FMLA) Leave**

#### **Eligibility for FMLA Leave**

Employees are eligible for FMLA leave if they have worked for the Company for at least one (1) year, for 1,250 hours over the previous twelve (12) months, and if at least fifty (50) employees are employed by the Company within seventy-five (75) miles.

## **Types of FMLA Leave**

Eligible employees can take FMLA leave for the following reasons:

### **Parental Leave**

Employees may take FMLA leave for incapacity due to pregnancy, prenatal medical care or child birth. Such leave may also be used to care for the employee's child after birth, or after placement with the employee for adoption or foster care.

### **Leave due to the Employee's Own or a Family Member's Serious Health Condition**

Employees may take FMLA Leave for a serious health condition that makes the employee unable to perform the employee's job. Employees may also take FMLA leave to care for the employee's spouse, son, daughter, or parent, who has a 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 health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three (3) consecutive calendar days combined with at least two (2) visits to a health care provider or one (1) visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

### **Qualifying Exigency Leave**

Eligible employees with a spouse, son, daughter, or parent on active duty or called to active duty status in (i) the National Guard or Reserves in support of a contingency operation, or (ii) the regular armed forces who are in or called to active duty in a foreign country, may use FMLA leave to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

### **Military Caregiver Leave**

Eligible employees may take FMLA leave to care for a son, daughter, parent or next of kin who is a covered servicemember. A covered servicemember is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the servicemember medically unfit to perform his or her duties for which the servicemember is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list. The definition of a serious injury or illness for a current servicemember also includes injuries or illnesses that existed before the beginning of the member's active duty and were aggravated by service in the line of duty on active duty in the Armed Forces. Covered servicemembers also include veterans who are undergoing medical treatment, recuperation or therapy for serious injuries or illnesses that were incurred or aggravated in the line of duty during the preceding five (5) years.

### **Length of FMLA Leave**

Employees may take up to twenty-six (26) weeks of Military Caregiver leave during a single twelve (12)-month period.

For all other types of FMLA leave, each employee may be granted leave for a period up to twelve (12) weeks (during any twelve (12)-month period). In determining eligibility for leave, a “rolling” twelve (12)-month period is used, measuring backward from the date the employee uses any FMLA leave.

In circumstances where both spouses work for the Company, the employees may be limited to a combined total of twelve (12) weeks of leave for parental leave or for leave to care for the employee’s parent with a serious health condition, or to a combined total of twenty-six (26) weeks of military caregiver leave.

If an employee is eligible for FMLA leave, and takes time off for an FMLA-qualifying purpose, such leave shall be counted as FMLA leave. Leaves taken pursuant to other Company policies (i.e., workers’ compensation, parental leave, short term disability) shall be deemed to run concurrently with FMLA leave.

## **Required Certifications**

Employees seeking leave due to a family member’s serious health condition will be required to submit a completed “Certification of Health Care Provider for Family Member’s Serious Health Condition” form. Employees seeking FMLA leave due to the employee’s own serious health condition will be required to submit a completed “Certification of Health Care Provider for Employee’s Serious Health Condition” form.

In all cases of leave due to the employee’s or a family member’s serious health condition, the Company reserves the right to request a second medical opinion at Company expense and further medical opinion, where appropriate. Periodic recertification also may be required for requested extensions of medical leave, lengthy leaves of absence and other appropriate circumstances.

Employees seeking Qualifying Exigency Leave will be required to submit a completed “Certification of Qualifying Exigency for Military Family Leave” form.

Employees seeking Military Caregiver Leave will be required to submit a completed “Certification of Serious Injury or Illness of Covered Servicemember” or “Certification of Serious Injury or Illness of a Veteran” form, whichever is applicable. In lieu of the form, the employee may provide invitational travel orders (ITOs) or invitational travel authorizations (ITAs).

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, the Company asks that employees not provide any genetic information when submitting the required certifications. ‘Genetic information,’ as defined by GINA, includes an individual’s family medical history, the results of an individual’s or family member’s genetic tests, the fact that an individual or an individual’s family member sought or received or received genetic services, and genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

## **Compensation During FMLA Leave**

Employees on FMLA leave are [are not] required to apply any accrued paid time off [sick time] [vacation time] [PTO] while taking FMLA leave. Employees must comply with the Company's normal policies for use of accrued paid time off.

If an employee does not have any accrued paid time, and is not eligible for other benefits, such as workers' compensation payments [or short or long term disability payments], the FMLA leave will be unpaid.

### Benefits During FMLA Leave

An employee on FMLA Leave will be retained on the Company's health plan on the same condition as active employees, except that the employee must make arrangements with Human Resources for timely payment of the employee's portion of the premium in order to continue such coverage, and if any premium payment is more than thirty days late, coverage may be lost during the remainder of the leave. In circumstances where an employee is on paid leave, the appropriate deductions will be made in the same manner as the employee's regular paycheck.

Arrangements also may be made with the VP of Operations for the continuation of certain other benefits during the period of leave. The employee may be entitled to the accrual of seniority or earn additional employee benefits (i.e., [vacation], [sick leave] or [PTO]) during the period of the leave. However, any FMLA leave will be treated as continued service for purposes of the Company's pension and other retirement plans.

An employee on an FMLA leave of absence [will] / [will not] be eligible for holiday pay during a designated holiday observed during the leave. If a holiday falls during a full week of FMLA leave, the holiday will count towards the employee's annual FMLA total. If the employee is taking less than a full week of FMLA leave, the holiday will only count as FMLA leave if the employee would have been scheduled and expected to work on the holiday.

In the event that an employee fails to return from leave, the employee may be liable for the employer's share of the insurance premiums unless: (i) the employee's failure to return to work stems from the continuation, recurrence, or onset of a serious health condition of the employee or a family member; or (ii) the failure to return stems from circumstances beyond the control of the employee.

### Reduced Work Schedule/Intermittent FMLA Leave

For all types of FMLA leave except Parental leave, an employee does not need to use the leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Intermittent Leave/Reduced Schedule Leave may not be taken in increments of less than one (1) hour.

Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the Company's operations. Further, where a reduced work schedule or intermittent leave is foreseeable based on planned medical treatment, the Company reserves the right to temporarily transfer the employee to a position that better accommodates the employee's recurring periods of leave.

### Company Notifications Regarding FMLA Leave

Employees requesting leave will be notified regarding whether they are eligible under FMLA. If they are, the notice will specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the Company will provide a reason for the ineligibility.

The Company will inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the Company determines that the leave is not FMLA-protected, the employee will be notified.

### **Return from FMLA Leave**

Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms, except that the employee will not be entitled to any employment rights or benefits, greater than those he or she would have had in the absence of taking such a leave.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

If an employee is unable to return from FMLA leave on the date set forth in the leave request and/or certification of healthcare provider, the employee is expected to contact the Company prior to the anticipated return to work date. If an employee fails to return from FMLA leave when scheduled, and does not contact the Company in advance, the employee may be deemed to have resigned.

### **Employee Protections Under the FMLA**

The FMLA prohibits the Company from:

- Interfering with, restraining, or denying the exercise of any right provided under the FMLA; or
- Discharging or discriminating against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer for violation of the FMLA.

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.

### **Other Types of Medical Leave**

An employee's request for medical leave which does not meet the qualifications for FMLA leave, as set forth above, or which exceeds the twelve (12)-week period, will be considered at the Company's discretion.

### **Parental Leave**

Full-time employees may be eligible for eight (8) weeks of unpaid parental leave under law Statute. To be considered for eligibility, you must have completed at least three (3) consecutive months of employment. You must provide at least two (2) weeks' written notice of your date of departure and

intention to return to work following the leave, or provide notice as soon as is practicable if the delay in notice is for reasons beyond your control.

Leave may be taken for:

- The purpose of giving birth, for adopting a child under the age of eighteen (18) (twenty-three (23) if the child is mentally or physically disabled), for placement of a child under the age of eighteen (18) (twenty-three (23) if the child is mentally or physically disabled), or for the placement of a child pursuant to a court order. If two (2) employees of the Company require leave to care for the same child, they are entitled to eight (8) weeks total parental leave between them.
- Employees on Parental leave may, but are not required to, apply unused vacation or sick time towards the leave period. However, no sick time or vacation time] will accrue during the leave. Health coverage will continue on the same basis as before the leave.
- Upon returning to work, you will be restored to your position, or a similar one with the same status, pay, length of service credit and seniority as of the date of the leave, unless economic or business conditions during the leave period would have resulted in a lay-off had leave not been taken.
- Employees on Parental leave may request unpaid leave in excess of the eight (8) weeks. However, you should be aware that you may not be entitled to the same reinstatement or benefits rights upon your return to work from more than eight (8) weeks leave.

## **Equal Employment Opportunity (EEO) Policies**

### **Non-Discrimination and Equal Employment Opportunity**

The policy of this Company is to provide equal employment opportunities by recruiting, hiring, training and promoting applicants and employees without regard to race, color, religion, creed, national origin, sex, age, ancestry, sexual orientation, genetics, pregnancy, marital status, gender identity/expression, disability, handicap, military obligations, veteran status or any other category protected by law ("protected class status"). Sexual orientation includes a person's orientation toward heterosexuality, homosexuality, bisexuality, or transgender status or another person's perception of your sexual orientation.

We affirm that the above policy reflects the Company's attitude and its intention to do the following:

- Recruit, hire and promote for all job classifications without regard to protected class status;
- Base decisions on employment so as to further the principles of equal employment opportunity;
- Make promotion decisions are in accord with principals of equal employment opportunity;
- Administer personnel actions such as compensation, benefits, transfers, determinations and company-sponsored training without regard to protected class status;
- Make equal employment opportunities available to qualified disabled or handicapped persons; and
- Provide equal employment opportunities to those who are Veterans.

### **Anti-Harassment Policy and Complaint Procedure**

#### **Introduction**

It is the goal of the Company to promote a workplace that is free of harassment based on race, color, religion, creed, national origin, sex, age, ancestry, sexual orientation, genetics, pregnancy, marital status, gender identity/expression, disability, handicap, military obligations, veteran status, participation in discrimination complaint-related activities or any other category protected by law ("protected class status"). Harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because we take allegations of harassment seriously, we will respond promptly to complaints of harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate. Likewise, Employees who fail to cooperate, who withhold relevant information in an investigation, or who intentionally provide false information will be subject to discipline, up to and including termination.

Please note that while this policy sets forth our goals of promoting a workplace that is free of harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual or other harassment.

## **Definition of Sexual Harassment**

“Sexual harassment” means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,
- such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual’s work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances - whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one’s sex life; comment on an individual’s body, comment about an individual’s sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one’s sexual experiences;
- Discussion of one’s sexual activities; and
- Dissemination in the workplace of sexually-explicit voice mail, e-mail, graphics, downloaded material or websites.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

## **Complaints of Harassment**

If any of our employees believes that he or she has been subjected to harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting [work addresses and telephone numbers of the appropriate individual to whom complaints should be addressed. Such individuals may include: the VP of Operations/or other appropriate supervisory person. These persons are also available to discuss any concerns you may have and to provide information to you about our policy on harassment and our complaint process.

## **Harassment Investigation**

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed harassment. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate, we will also impose disciplinary action.

## **Disciplinary Action**

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

## **State and Federal Remedies**

In addition to the above, if you believe you have been subjected to unlawful harassment, you may file a formal complaint with the government agencies set forth below. If you work for the Company outside of Colorado, please check the white pages of your local telephone directory or the Internet for the contact information of the comparable state agency. Using our complaint process does not prohibit you from filing a complaint with these agencies.

Each of the agencies has a short time period for filing a claim (EEOC and MCAD – 300 days and six months with the Colorado Division of Civil Rights).

### **In Colorado:**

The address and telephone number for the EEOC's local branch in Denver is noted below, but an employee can contact the EEOC to locate other branches. The contact information for the comparable state agencies is also provided below.

Equal Employment Opportunity Commission  
303 E 17th Ave #410  
Denver, CO 80203  
1-800-669-4000

Colorado Division of Civil Rights - Main Office  
1560 Broadway, Suite 1050  
Denver, CO 80202  
Phone: (303) 894-2997  
Toll-Free (English/Spanish): (800) 262-4845  
Fax: (303) 894-7830

## **Reasonable Accommodation**

The Company is committed to complying with the Americans with Disabilities Act and applicable state and local laws prohibiting discrimination in employment against qualified individuals with disabilities. The Company will endeavor to provide reasonable accommodations requested by all employees with disabilities who are otherwise able to perform the essential functions of their job. An employee seeking an accommodation should contact Human Resources.

A reasonable accommodation may include any action which enables a qualified individual with a disability to perform the essential functions of his or her position but which does not result in an undue hardship to the Company or pose a threat to the health and safety of the employee or coworkers. The Company will engage in an interactive process with the employee and determine the feasibility of the requested accommodation, considering various factors, including but not limited to, whether the accommodation is effective, the nature and cost of the accommodation, the availability of outside resources, the overall financial resources of the organization and the accommodation's impact on the operation of the business.

The Company may require that the individual requesting the accommodation provide adequate medical certification and a job related functional assessment. It may, under certain circumstances, request and finance an independent medical examination. Also, in some instances, the Company may not approve the accommodation requested by the employee but may provide an alternate accommodation.

The employee will be informed of the decision on the accommodation request by the VP of Operations.

## **Fairness to Pregnant Workers**

Exfil Security will comply with Federal and Colorado Law. Employees have the right to be free from discrimination in relation to pregnancy or a condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child. The right to be free from such discrimination includes the right to reasonable accommodations for conditions related to pregnancy.

The Company shall provide a reasonable accommodation for an employee's pregnancy or any condition related to the employee's pregnancy (which includes, but is not limited to, lactation or the need to express breast milk for a nursing child) to enable the employee to perform the essential functions of the employee's job, unless the requested accommodation would impose an undue hardship to the Company. A reasonable accommodation may include, among other things: (i) more frequent or longer paid or unpaid breaks; (ii) time off to attend to a pregnancy complication or recover from childbirth with or without pay; (iii) acquisition or modification of equipment or seating; (iv) temporary transfer to a less strenuous or hazardous position; (v) job restructuring; (vi) light duty; (vii)

private non-bathroom space for expressing breast milk; (viii) assistance with manual labor; or (ix) a modified work schedule.

Employees seeking pregnancy-related accommodations should make a request to the VP of Operations. After the employee has requested an accommodation, the Company and the employee will engage in an interactive process to determine the feasibility of a requested accommodation. During the interactive process, the Company may require documentation about the need for a reasonable accommodation from an appropriate health care or rehabilitation professional unless the employee has requested more frequent restroom, food or water breaks, seating, limits on lifting over twenty (20) pounds, or a private non-bathroom space for expressing breast milk. The Company may also require documentation when an employee seeks an extension of the accommodation beyond the originally extended accommodation.

In determining whether an accommodation constitutes an undue hardship, the Company will consider the nature and cost of the needed accommodation, the overall financial resources of the Company, the overall size of the business of the Company with respect to the number of employees and the number, type and location of its facilities, and the effect on expenses and resources or any other impact of the accommodation on the Company's program, enterprise or business.

The Company will not:

- take an adverse action against an employee that requests or uses a reasonable accommodation;
- deny an employment opportunity to an employee because of the Company's need to provide the employee a reasonable accommodation based on a known condition related to the employee's pregnancy;
- require an employee to accept an accommodation the employee chooses not to accept where the accommodation is not necessary to enable the employee to perform the essential functions of the job;
- demand that an employee take a leave of absence if another reasonable accommodation would suffice and would not pose an undue hardship to the Company; or
- refuse to hire a person who is pregnant because of the person's pregnancy or condition related to pregnancy where the person can perform the essential functions of the position with a reasonable accommodation that would not impose an undue hardship to the Company.

## **Rules of Conduct**

### **Rules of Conduct Generally**

Whenever people work together, some rules of conduct are needed to help them get along harmoniously. The Company wishes to define these rules as clearly as possible to promote maximum understanding and cooperation. We ask the cooperation of all members of the Company to observe these rules. The following is a non-exhaustive list of examples of those infractions which may result in disciplinary action:

- Excessive or unjustified absences or tardiness, even if unavoidable. Failure to inform supervisor promptly by telephone or other means when unable to report to work.
- Deliberate or careless damage to Company property or equipment.
- Disregarding instructions of or insubordination to supervisor or other proper authority.

- Inefficient or careless performance of duties, including failure to maintain proper standards of workmanship or productivity.
- Disorderly conduct or horseplay on Company premises.
- Falsifying employment applications, personnel security questionnaires, work records, or other Company records.
- Failure to observe safety rules and regulations.
- Failure to return to work upon expiration of an authorized leave or vacation.
- Misrepresentation of the reasons for a leave of absence or for other time off from work.
- Theft from fellow employees or from the Company.
- Failure to observe department work schedules, including lunch and break periods.
- Misuse of sick leave.
- Engaging in any illegal activity, whether on or off Company premises.
- Possession of firearms or any dangerous weapon on Company premises.
- Gambling, lottery, or other game of chance on Company property at any time.
- Violation of any policy enumerated in this employment handbook.
- Harassment of employees or customers.

### **Violence Policy**

Nothing is more important to the Company than the safety and security of our employees and visitors. Threats, threatening behavior or acts of violence against employees, visitors or guests of the Company will not be tolerated. Violations of this policy will lead to disciplinary action, up to and including termination. In addition, the Company is sensitive to issues of domestic violence and the potential danger it poses to our employees and our workplace. Accordingly, the Company will not hesitate to contact the appropriate law enforcement authorities in the event of any threatening behavior or act of violence against employees, visitors, or guests of the Company, and to initiate criminal prosecution, if appropriate.

No employee shall be permitted to bring any guns, knives or other items which could be used as weapons onto Company premises. Employees may in some circumstances be permitted to bring pepper spray, mace or other non-lethal personal protective devices, provided that they have the proper legal authorization (CHP Card) and that they obtained advance written approval from a member of management. The Company reserves the right to prohibit employees from carrying any items which management, in its sole discretion, deems to be dangerous or potentially dangerous. If you become aware, either directly or indirectly of any violence or threats of violence, whether vague, direct or indirect, notify your human resources representative immediately. In addition, the Company requests that employees who currently hold or seek to obtain temporary or permanent restraining orders against others who have threatened or committed violent acts against them to so inform the VP of Operations, in order to apprise the Company of any potential threats to your security or the security of others within our workplace. The VP of Operations understands the sensitivity of this type of information and will make every effort to protect the confidentiality and privacy of the person(s) involved.

### **Confidential Information**

Company trade secrets and customer information must be held in strictest confidence. Under no circumstances may employees discuss such information with a relative, a friend, or anyone else outside of the Company without the express consent of the Company. Specifically, you are not permitted to make public statements to the press or other news media on behalf of the Company without such express consent.

### **Dress Code**

The Company does not have a formal dress code. All employees should realize that personal appearance influences many people. Employees should therefore dress in clothing that is in good taste for a business atmosphere, and which will not be offensive to customers or employees of the Company. If an employee is in doubt about a particular clothing article or outfit, the employee's supervisor should be consulted before it is worn. The employee's adherence to this dress code is a factor considered in the appraisal procedure.

### **Alcohol**

Employees will not be permitted to work if they are under the influence of alcohol.

Further, the use of controlled substances is inconsistent with the behavior expected of our employees as it subjects our workforce and customers to unacceptable safety risks and undermines our ability to operate efficiently. Accordingly, the use, sale, purchase, or possession of drugs or drug paraphernalia or other dangerous substances by an employee, except in accordance with medical authorization, is strictly prohibited.

If an employee is lawfully taking a medication (including prescribed medications, home remedies and over-the-counter medications) that may interfere with the employee's ability to perform any aspect of their job, the employee must inform his/her supervisor or COO before undertaking any work activities. In such cases, the employee may be required to take time off during the period that the medication is being used and/or be required to provide medical documentation confirming their ability to safely and effectively perform their job duties, notwithstanding use of the medication.

Violation of this policy will result in disciplinary action up to and including immediate termination. Employees suffering from addiction may request reasonable accommodations, such as time off for treatment. If an employee has a drug or alcohol problem, the Company urges the employee to report the matter to COO before work-related problems occur.

### **Smoking**

Recognizing that smoking in the workplace may adversely affect employees, all Company work areas are smoke-free. Employees who smoke may do so in the designated outdoor areas during their breaks or lunch period, but these may not be broken into segments for the purpose of smoking. Smokers are expected not to abuse break rules. Smokers are also expected to observe common courtesy and maintain designated outdoor smoking areas litter-free. Employees are expected to coordinate time away from their work areas to ensure that all telephones are covered during their periods of absence.

### **Gifts and Gratuities**

The Company is in business to serve our clients. On occasions, the employee may be offered tips or other gratuities for services performed as part of the job. Whenever gifts or gratuities are offered in appreciation of service, they should be graciously declined. At Christmas, employees may accept token gifts or advertising material.

Employees may not under any circumstances accept gifts, pay-offs or kickbacks of any type from customers, clients or potential customers or clients. Violation of this rule will subject the employee to immediate disciplinary action, up to and including discharge.

### **Employment of Relatives**

The Company permits the employment of qualified relatives of employees as long as such employment does not, in the opinion of the Company create actual or perceived conflicts of interest, disruptions in the workplace or other performance problems. For purposes of this policy, "relative" is

defined as a spouse, significant other, child, parent, sibling, grandparent, aunt, or uncle, corresponding in-law or “step” relation. The Company will exercise sound business judgment in the placement of related employees in accordance with the following guidelines:

- Individuals who are related, as defined above, are permitted to work in the same facility, provided no direct reporting or supervisory/management relationship exists. That is, no employee is permitted to work within the “chain of command” for a relative such that one relative’s work responsibilities, salary, or career progress could be influenced by the other relative.
- No relatives are permitted to work in the same department or in any other positions in which the Company believes an inherent conflict of interest, disruption in the workplace or other performance problem may arise.

Employees who become related while employed are treated in accordance with these guidelines. That is, if, in the opinion of the Company, a conflict, disruption or other performance problem arises as a result of the relationship, one (1) of the employees may be transferred and/or disciplinary action may be imposed.

### **Non-Fraternization**

Romantic relationships between supervisory or management personnel and employees within their chain-of-command can raise issues of equity, fairness, and favoritism. Even the appearance of favoritism must be avoided. Accordingly, such relationships are not permitted by the Company. If management becomes aware of any such relationship, both parties will be consulted. One of the involved employees may be transferred (i.e., outside the chain-of-command) and/or other disciplinary or corrective action may be imposed.

Romantic relationships between employees who are not within the same chain-of-command are not addressed by this policy. However, if, in the opinion of the Company, the appearance of impropriety, or a conflict, disruption, or other performance problem may arise as a result of such relationship, the Company reserves the right to address the matter in accordance with the principles set forth herein. The Company reserves the right to modify this policy as business situations may require.

## **Termination of Employment**

### **Notification of Termination by Employee**

Employees who consider leaving the Company’s employ should discuss the situation with their supervisor or with the Personnel Director. With a better understanding of the employee’s concerns, it may be possible to make an adjustment that will satisfy the employee and retain the advantages earned by working with the Company. If, after due consideration, the employee should decide to terminate employment, the employee must submit a resignation letter to his/her supervisor.

### **Notification of Termination by Employer**

The Company maintains the right to terminate employees as it deems appropriate on an at-will basis, with or without cause, and with or without notice. Subject to Company discretion, the employee may be placed on disciplinary or performance probation in an effort to give the employee additional time to remedy the problem which led to the probation.

### **Exit Interviews and Termination Procedures**

Employees who leave the Company’s employ will generally be interviewed by the VP of Operations prior to final separation and will complete necessary termination forms and procedures.

## **References**

All requests for information about or references for former employees are handled by the Company's VP of Operations.

As a general rule, only facts concerning dates of employment, title, confirmation of employment duties or work locations will be given. Additional information about performance will generally be furnished only upon receipt of a signed consent agreement to the release of this information from the former employee.

No one currently working for the Company has the authority to give a reference for a current or former employee. This prohibition applies to LinkedIn endorsements and other social media references. Regardless of the nature of the request, including an inquiry from a business friend, professional acquaintance, or former associate, you must decline comment and refer the request to the VP of Operations.

## **Communications**

### **Employee Grievance Procedures**

Exfil Security has established a Grievance Procedure to ensure fairness and consistency in employee relations and to resolve employee concerns in an efficient and effective manner. You are an important member of our team. As such, if you believe you are treated unfairly, inappropriately, or have other concerns regarding your employment, you are encouraged to bring those concerns to the Company through this process.

Often problems arise out of a lack of understanding and miscommunication. As a result, most grievances can be resolved informally by discussing your concerns. We therefore urge you to speak with your supervisor if you have any employment-related concerns or problems, or if you simply have a question. Managerial doors are always open to you. The Company is committed to working with employees on a one-on-one basis to resolve disputes or grievances. If you are not comfortable speaking with your supervisor, you should contact Chris Butler, VP of Operations.

However, if you feel that a question or problem cannot be, or has not been, resolved informally, you may pursue the matter through the Company's formal Grievance Procedure. The Grievance Procedure is a formal method to communicate your problems or concerns, allowing you to discuss matters with several levels of management. The specific process is set forth below:

1. Grievances should first be filed in writing with Chris Butler, VP of Operations. Grievances should be presented within thirty (30) calendar days of the occurrence which gave rise to the grievance. Any grievance submitted after thirty (30) calendar days will be reviewed to determine if it is timely. Accordingly, any grievance submitted after thirty (30) calendar days should contain an explanation for the delay.

The grievance statement should include your name and department, what the problem is, when the problem arose, which supervisor you discussed the problem with, when you discussed the problem with that supervisor, an explanation of the supervisor's response, why you do not believe that is an appropriate response, and a suggested resolution(s).

2. Chris Butler, VP of Operations will review the written submission and will endeavor to provide a written response in a reasonable amount of time. If necessary, Chris Butler, VP of Operations, will conduct an investigation into the matter and may discuss the problem with you, the relevant supervisor(s) and other relevant witness(es).

3. If you are not satisfied with the result of the review, you may within two (2) weeks after you receive a written response request reconsideration by Chris Butler, VP of Operations. Such request must be in writing.

4. If appropriate, Chris Butler, VP of Operations may gather additional information, interview or re-interview personnel, and in any case, will respond to the grievance. You will be notified of the determination. The decision of Chris Butler, VP of Operations will be final.

5. No retaliatory action will be taken against an employee engaging in this process in good faith.

## **Solicitations and Distribution**

The following rules apply to solicitation or distribution of literature and fundraising by or to company employees.

Individuals who are not employed by the Company may not solicit or distribute materials on Company premises.

- No employee may distribute literature or materials for any purpose not directly related to his or her assigned work on Company property during the employee's working time or the working time of any employee approached. In addition, distribution of written materials of any kind is prohibited in all working areas.
- No employee may solicit clients for any purpose not directly related to his or her assigned work, such solicitation includes but is not limited to selling personal items, fundraising, etc..
- No employee may solicit other employees for any purpose not directly related to his or her assigned work on Company premises during his or her working time or the working time of the employee being solicited.
- No employee may directly or indirectly sell any item or post literature or other matters on Company premises without proper authorization.
- As used in these rules, the term "working time" means the period of time that is spent in the performance of actual job duties, and does not include meal periods or breaks.

**NOTHING HEREIN SHALL BE INTERPRETED OR APPLIED TO INTERFERE WITH AN EMPLOYEE'S RIGHTS UNDER THE NATIONAL LABOR RELATIONS ACT.**

## **Exfil Security Property and Systems**

### **Exfil Security Property**

Employees are expected to exercise care in the use of Exfil Security property. Negligence in the care and use of Exfil Security property, unauthorized removal, or personal use of Exfil Security property may result in discipline up to and including termination. Exfil Security property issued to an employee, including software, manuals and proprietary information, must be returned when the employee is terminated, whether voluntarily or involuntarily. If the employee does not return Exfil Security property upon his/her termination, the employee must reimburse the Exfil Security for the value of the property not returned.

No employee may remove Exfil Security property from the premises without written approval from the supervisor or department head who is responsible for the property in question. The kind of property subject to this policy includes, but is not limited to:

- Materials, equipment, and tools.
- Personal property owned by the Exfil Security or other employees.
- Confidential literature including technical, sales, and quality control documents.
- Computer disks, tape, and other storage media.
- Information identified as proprietary or designated as a trade secret.

Employees who remove or attempt to remove Exfil Security property without proper approval may receive discipline, up to and including discharge.

### **Exfil Security Searches**

Exfil Security supervisors have the authority to request that any employee open for inspection any package or other container brought on or taken from Exfil Security premises. The term "Exfil

Security premises" includes Exfil Security offices, all work areas, desks, lockers, rest areas and lounges, parking lots, driveways, and any vehicle owned or leased by the Exfil Security.

In addition, the Exfil Security may conduct searches of Exfil Security property, including lockers, desks and Exfil Security-issued employee vehicles parked on Exfil Security premises, at any time the Exfil Security has reason to believe that Exfil Security property has been taken.

If an employee is found in possession of Exfil Security property without authorization, he or she will be subject to discipline, up to and including discharge.

Any contraband items and/or illegal substances found during a Exfil Security search pursuant to this policy will be turned over to law enforcement authorities. Employees found in possession of such items will be subject to discipline, up to and including discharge.

Any employee who refuses to comply with a search or investigation performed pursuant to this policy will be subject to discipline, up to and including discharge.

## **Computer Use**

### **Overview**

This policy describes the appropriate use of the Company's electronic mail system (email) and Internet access. The policy applies to everyone working at the Company. Interpretation of this policy is at the sole discretion of the partnership. A major purpose of the policy is to promote the efficient and appropriate use of our technology in providing high quality service to our clients and in providing an efficient and pleasant work environment at the Company.

This policy applies to any use of the email system, the Internet and the computer hardware that the Company has provided. The policy is based on common sense and is not meant to be exhaustive. Other policies provide guidance regarding the use of other electronic information and communications systems such as phone systems, facsimile machines and voice mail. The Company takes these matters very seriously. In the event of a serious violation of this policy, the sanction could include termination.

### **Privacy**

Email and Internet communications are not private. Email and Internet access are valuable communication and research tools for conducting the Company's business. Because the Company provides employees with these tools, employees and members of the Company do not have a reasonable expectation of privacy in email and Internet communications. The Company has the right to view and disclose all electronic communications including email and Internet access.

### **Proper Use**

**Use Should be for Company Business:** The Company provides email and Internet access in order to provide high quality service to our clients and to assist in our internal operations. With those goals in mind, it is understood that there will be occasional use of email and the Internet for personal reasons, just like our phone system is occasionally used for personal reasons. It should be clear, however, that excessive use of the Company's email and Internet access for personal reasons is unacceptable. Personal use is excessive if it interferes with productivity or morale, similar to excessive personal phone use.

Keep in mind that when using the Company's email, your "Sempersec.com" address will appear. The recipient might view the appearance of this address as similar to receiving a letter on Company stationery. This is another reason that your email should be related to the business of the Company. There is a similar issue with chat-rooms, computer bulletin boards, chain-mail and the like. Also keep in mind that it is illegal to disseminate copyrighted materials without permission by electronic means. Do not send or forward copyrighted materials by email or over the Internet. Certain content is unacceptable: In the course of using email or the Internet, there often is a tendency to lose inhibitions or gain a false sense of privacy. The Company will not tolerate unlawful or harassing content in email or access to inappropriate Internet sites. Such conduct cannot advance the interests of the Company and it may be harmful to others.

As a non-exhaustive list, do not use the Company's system in any way that may be deemed illegal, fraudulent, or harassing to others including sexually explicit messages or cartoons, ethnic or racial slurs, or any derogatory comments relating to age, race, color, sex, sexual orientation, religious beliefs, etc.

**Imagine someone looking over your shoulder:** It is very common for lawyers to ask opposing parties in litigation to disclose all electronic communications. In fact, the outcome of many cases has turned on a single email message or other electronic communication. It is also very easy to send an email message to the wrong person by mistake. Additionally, messages often are printed out or forwarded far beyond the original recipient without the author's knowledge. Because of this, you should assume that someone other than the intended recipient will have access to your electronic communications and you should exercise discretion accordingly.

**Deleted information sometimes remains accessible:** Do not assume that information is forever erased because you have deleted it. Electronic information is stored in many ways and there are consultants who do nothing but retrieve "deleted" information for their clients who understand the value of information that people thought they could eliminate by hitting the delete button. In sum, don't do something on the computer that you know you shouldn't do and expect that no one will know after it is deleted.

**Internet communications are not confidential:** You should be especially aware that email sent over the Internet can be intercepted. Do not send unencrypted confidential information over the Internet.

**Do not snoop:** Needless to say, the Company will not tolerate anyone snooping in electronic information. This prohibition applies to all of the Company's electronic media including word processing files, email, databases or any other electronic storage. Similarly, don't use the Company's technology equipment to gain access to information unless you have a legitimate right to that information.

**Viruses:** Computer viruses can have a devastating effect on our network. One of the common ways that viruses are spread is through executable (.exe) files. Do not open executable files that you receive as an email attachment or otherwise unless you have the permission of the IT department. Also, do not load any software, including screen savers, whether from disc or from the Internet, onto your computer or the network without IT approval.

**The Company Monitors Email and Internet use:** You should be aware that the Company regularly assesses the volume of email and Internet use and can monitor email messages and Internet access.

The Company also has the ability to identify specific web site pages that have been accessed. The Company has no inclination to regularly monitor email messages, but if abuse is suspected, will do so.

**Software Licensing:** Specific federal regulations govern the licensing and use of computer software. You should be aware of these regulations and follow them in all aspects of your work with computer systems. In general, all software you use, including software you receive from vendors for evaluation or as a gift, should be properly licensed and used only as the vendor intended. Any employee who knowingly makes, acquires, or uses unauthorized copies of computer software licensed to the company or who places or uses unauthorized software on company premises or equipment will be subject to disciplinary action up to and including termination of employment, depending on the seriousness of the offense. If you have any questions about the correct licensing of software, please contact your Information Systems group.

## **Social Media Communications**

This Company understands the importance of social computing, networking and social media in today's world. Social media sites like Facebook, LinkedIn, Instagram, and Twitter are all very popular. Social media can also take other forms, too, such as blogs, wikis, file sharing sites, forums, discussion groups and chat rooms. Social Media can be an extremely effective way of marketing our organization and expanding our interactions with employees, vendors and customers. While embracing new technologies, we also want to make sure that the Company and our employees engage in social networking in a responsible manner.

This policy provides guidance on how to engage in social networking in a way to protect yourself and the interests of the Company, its employees, vendors and customers. These guidelines supplement current Company policies.

- **SOCIAL NETWORKING SITES SHOULD NOT BE CONSIDERED PRIVATE.** Generally, information posted on social networking sites should be considered public and you should expect that even with your use of certain privacy settings what you post on social networking sites will be seen by others outside your intended group of viewers.
- **COMPANY POLICIES STILL APPLY/MONITORING.** Company policies still apply when using social media sites. Rules prohibiting the unlawful harassment of co-workers, i.e., still apply to your on-line activities. We may monitor employee social media communications for compliance with Company policies.
- **USE COMMON SENSE/THINK BEFORE YOU POST.** You are responsible for the content you publish on social media sites. What you post could be online for a long time. As a representative of the Company, always consider how your comments will be viewed in light of protecting and enhancing both the Company's reputation and your own.
- **RESPECT OTHERS.** Do not post defamatory comments about the Company or its customers.
- **Protect confidential information.** Do not share or disclose trade secrets or proprietary information.
- **Be clear about who you are speaking for.** Only authorized employees may communicate information on behalf of the Company. Without permission you are not authorized to make statements, comments or press releases on behalf of the Company. You should make clear that you

are speaking for yourself and not on behalf of the Company. In some instances, it may be appropriate to add in this language: "The views expressed on this 'site' are my own and do not reflect the views and opinions of Exfil Security".

- **Use your own email address.** Always use your personal email address and not your sempersec.com email address as your means of contact or identification.
- **Respect copyrights, trademarks, and fair use.** Remember to respect the copyrighted materials owned by others, and reference the sources you use. Never distribute copyrighted materials (such as videos, photos, books, etc.) online as copyright infringement and plagiarism laws apply to posts on the Internet.
- **Stay productive.** Social media participation can be productive and beneficial both personally and professionally. However, ensure that such personal activities do not interfere with your work activities. Social media sites should not be used during work times except for business-related activities.
- **Use social networking safely.** Always review the applicable privacy and security settings so that you understand how much or little information you are comfortable sharing.

This policy is not intended to infringe upon an employee's right to engage in protected concerted activity under 29 U.S.C. sec. 157. Employees have the right to discuss terms and conditions of employment and mutual work-related concerns.

If you have any questions about this policy or any issues surrounding social media, please contact:  
Chris Butler; Phone 720.933.7196; email address: chris.butler@exfilsecurity.com.

## **Security**

Security of Company facilities as well as the welfare of our employees requires that every individual be constantly alert to security risks. In this regard please note the following:

- Immediately notify your manager of suspicious persons, or persons acting in a suspicious manner, in or around the facility.
- Immediately notify a manager of the loss of keys, security passes or identification badges.
- Do not lend keys, security passes, or identification badges to anyone who is not authorized to possess them.
- Do not disclose computer passwords, electronic door codes, or any other security access information to anyone who is not authorized to have that information.

## **Employee Property**

Employees are urged not to bring valuables to work. If necessary to do so, all valuables should be kept in a secure location. The Company assumes no responsibility for the loss, theft or damage of employee personal property.

## **Health and Safety**

The health and safety of employees and others on Company property are of critical concern to the Company. We strive to attain the highest possible level of safety in all activities and operations. The Company also intends to comply with all health and safety laws applicable to our business.

To this end, the Company must rely upon our employees to ensure that work areas are kept safe and free of hazardous conditions. Employees should be conscientious about work place safety including proper operating methods and known dangerous conditions or hazards. Employees should report any unsafe conditions or potential hazards to a manager immediately, even if you believe you have corrected the problem. If you suspect a concealed danger is present on Company premises, or in a product, facility, piece of equipment, process or business practice for which the Company is responsible, bring it to the attention of your manager immediately. Managers should arrange for the correction of any unsafe condition or concealed danger immediately and should contact the Human Resources Manager regarding the problem.

Periodically, the Company may issue rules and guidelines governing workplace safety and health. The Company may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines as strict compliance will be expected. Failure to strictly comply with rules and guidelines regarding health and safety or negligent work performance which endangers health and safety will not be tolerated.

Any workplace injury, accident or illness must be reported to your manager as soon as possible, regardless of the severity of the injury or accident. If medical attention is required immediately, managers will assist employees in medical care, after which the details of the injury or accident must be reported.

## **Communicable Diseases**

In order to help keep the Company safe, we need your help. If you are (a) diagnosed with an illness that is communicable in our workplace such as active TB (Tuberculosis) or Covid 19, or (b) if you believe you may have been exposed to a person so diagnosed, or (c) if you have recently visited a location in which there has been an outbreak of such an illness and you do not feel well or are exhibiting any symptoms of the illness in question, you must report this to the **VP of Operations**. This information will be kept confidential to the extent reasonably possible but, obviously, full confidentiality cannot be guaranteed under these circumstances.

## **Criminal Background Check Policy**

This policy is applicable to the criminal history screening of prospective and current employees, subcontractors, volunteers and interns.

Where Criminal Offender Record Information (CORI) and other criminal history checks may be part of a general background check for employment, volunteer work, the following practices and procedures will be followed.

### **Conducting CORI Screening**

CORI checks will only be conducted as authorized by law and only after an authorization form has been completed. If a new CORI check is to be made on a subject within a year of his/her signing of the Acknowledgement Form, the subject shall be given seventy-two (72) hours' notice that a new CORI check will be conducted.

### **Access to CORI**

All CORI obtained is confidential, and access to the information must be limited to those individuals who have a "need to know". This may include, but not be limited to, hiring managers, staff submitting the CORI requests, and staff charged with processing job applications. We shall maintain and keep a current list of each individual authorized to have access to, or view, CORI.

### **Use of Criminal History in Background Screening**

CORI used for employment purposes shall only be accessed for applicants who are otherwise qualified for the position for which they have applied. Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant. Rather, determinations of suitability based on background checks will be made consistent with this policy and any applicable law or regulations.

### **Verifying a Subject's Identity**

If a criminal record is received, the information is to be closely compared with the information on the Acknowledgement Form and any other identifying information provided by the applicant to ensure the record belongs to the applicant.

If the information in the CORI record provided does not exactly match the identification information provided by the applicant, a determination is to be made by an individual authorized to make such determinations based on a comparison of the CORI record and documents provided by the applicant.

### **Inquiring About Criminal History**

In connection with any decision regarding employment or volunteer opportunities, the subject shall be provided with a copy of the criminal history record prior to questioning the subject about his or her criminal history. The source(s) of the criminal history record is also to be disclosed to the subject.

### **Determining Suitability**

If a determination is made, based on the information as provided in Criminal Background Check section of this policy, that the criminal record belongs to the subject, and the subject does not dispute

the record's accuracy, then the determination of suitability for the position or license will be made. Unless otherwise provided by law, factors considered in determining suitability may include, but not be limited to, the following:

- Relevance of the record to the position sought;
- The nature of the work to be performed;
- Time since the conviction;
- Age of the candidate at the time of the offense;
- Seriousness and specific circumstances of the offense;
- The number of offenses;
- Whether the applicant has pending charges;
- Any relevant evidence of rehabilitation or lack thereof; and
- Any other relevant information, including information submitted by the candidate or requested by the organization.
- The applicant is to be notified of the decision and the basis for it in a timely manner.

## **Adverse Decisions Based on CORI**

If an authorized official is inclined to make an adverse decision based on the results of a criminal history background check, the applicant will be notified immediately. The subject shall be provided with a copy of the organization's CORI policy and a copy of the criminal history. The source(s) of the criminal history will also be revealed. The subject will then be provided with an opportunity to dispute the accuracy of the CORI record. Subjects shall also be provided a copy of DCJIS' Information Concerning the Process for Correcting a Criminal Record.

## **Secondary Dissemination Logs**

All CORI obtained from the DCJIS is confidential and can only be disseminated as authorized by law and regulation. A central secondary dissemination log shall be used to record any dissemination of CORI outside this organization, including dissemination at the request of the subject.

## **At-Will Employment Agreement and Acknowledgement of Receipt of Employee Handbook**

# **Employee: Anne Pettigrew**

### Acknowledgment of Receipt of Employee Handbook

1. I have received and read the Company's Employee Handbook.
2. I understand that the policies, rules and benefits described in the Handbook are intended for guidance only and are subject to change at the sole discretion of the Company any time, without notice.
3. I further understand that the Handbook does not create a contract of employment, but rather my employment with the Company is on an at-will basis. As such, I am free to resign at any time, and the Company may terminate my employment at any time, for any reason at all, with or without notice.
4. I understand that it is my responsibility to be familiar with the material contained in it, prior to the beginning of work.

I hereby acknowledge receipt of the Employee Handbook provided by Chris Butler on this 17th day of August, 2020.

### Signatures

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Anne Pettigrew  
Project Coordinator

Date

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Chris Butler  
VP of Operations

Date