

2018 Employee Handbook

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INTRODUCTION

This handbook was developed as a guide to acquaint employees with Aspira's expectations and to outline certain key policies and programs, as well as benefits available to eligible employees. It is intended to provide a general overview about employment with Aspira, but is not a comprehensive listing of all of Aspira's policies and practices. Employees should take the time to familiarize themselves with the contents of this employee handbook.

NOTICE AND CHANGES TO THE HANDBOOK

This Employee Handbook replaces all prior company employee handbooks and prior management memos to the extent that such memos contradict a subject or policy covered within the Handbook. Please note the policies in this Handbook are subject to change at the sole discretion of the Company, and employees will be notified of any changes as soon as practicable. No employee handbook can possibly cover all situations that may arise; therefore, all employees are expected to follow ordinary rules of common sense and professionalism in addition to these specific policies. This handbook is effective March 22, 2018, and it applies to all employees.

ABOUT ASPIRA

Aspira[™] provides connected experiences for the outdoor recreation industry. Our comprehensive suite of reservation and licensing technology and service solutions support federal, state, provincial, and local government park, campground, and conservation agencies, conveniently connecting them with outdoor adventure seekers from around the world. Aspira is headquartered in Dallas, TX with nine offices worldwide. For more information, please visit AspiraConnect.com.

OUR MISSION

Our mission is to cultivate a connected world through shared experiences. By putting preservation first, we expand opportunities, bring different cultures and communities together, and create new ways to unite people through technology. Together, let's serve those seeking solitude, adventure and quality time with their loved ones.

CORE VALUES

These are the values that guide us.

- ▲ **Conservation**: We take pride in learning from the past and are committed to protecting the earth's natural resources for generations to come.
- ▲ **Optimism:** We choose to embrace our work with enthusiasm and inspire others through positivity.
- Collaboration: Teamwork, combined with effective communication, drives our collective success.
- ▲ **Simplicity:** Our focus is on providing efficient, convenient, and quality experiences that drive superior results.
- ▲ **Service:** We put our customers first and are accountable for delivering on all promises made.
- ▲ **Innovation:** We lead with a curious mindset, foster creativity, and have the courage to build and shape a better future.

EMPLOYEE PRACTICES

Please note that each work site is subject to applicable country, provincial, state, and local laws. Any inconsistencies should be resolved in favor of any applicable law. Please review the Appendices for information on country-specific practices and contact a Human Resources representative for additional assistance.

DEFINITIONS

The terms "employee" and "employment" as used throughout this handbook refer to the employees of and employment with RA Outdoors, LLC d/b/a Aspira and its direct and indirect subsidiaries (collectively, the "Company").

EMPLOYMENT AT-WILL

Subject to applicable laws, all employment relationships with Aspira are on an at-will basis which means employment may be terminated with or without cause¹ and with or without notice at any time by the employer or the employee. Any modification to an employee's "at will" status must be in writing and signed by the Chief Executive Officer or President of the Company and the employee.

Please see Appendix A for U.S. practices Please see Appendix B for Canada practices.

EQUAL EMPLOYMENT OPPORTUNITY

Aspira is proud to be an equal opportunity employer committed to hiring a diverse and inclusive workforce. As part of this commitment, Aspira provides equal employment opportunities to all employees and employment applicants without regard to unlawful considerations of race, religion, color, national origin, sex, sexual orientation, gender identity and/or expression, age, disability, marital status, veteran status, genetic information, military status, whether an employee has filed a charge of discrimination, or any other classification protected by applicable country, provincial, state, or local law. This policy applies to all aspects of employment, including but not limited to: recruitment, hiring, job assignment, compensation, promotion, transfer, benefits, training, discipline, and termination.

HARASSMENT PREVENTION

Aspira is committed to providing and maintaining a positive work environment free from conflicts of interest, displays of favoritism, sexual and other harassment and/or discrimination, and behavior which might interfere with work performance or decrease employee morale.

Aspira strictly prohibits sexual harassment as well as harassment based on such factors as race, religion, color, national origin, sex (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity and/or expression, age, disability, marital

For purposes of this policy, "Cause" means: (a) acts or omissions constituting negligence, recklessness or willful misconduct on your part with respect to the performance of your employment obligations or otherwise relating to the business of Aspira; (b) any acts or conduct by you that are or may be deemed as adverse to Aspira's interests; (c) your actual or threatened breach of any Company policies or agreements governing your relationship with Aspira including, without limitation, Aspira's Employee Proprietary Information and Inventions Assignment Agreement; (d) your conviction or entry of a plea of nolo contendere for fraud, misappropriation or embezzlement, or any felony or crime of moral turpitude or that otherwise negatively impacts your ability to effectively perform your employment duties for Aspira; (e) your willful neglect of your employment duties as determined in the sole and exclusive discretion of Aspira's senior management; (f) your inability to perform the essential functions of your assigned position, with or without reasonable accommodation, due to a mental or physical disability or loss of your professional license; or (g) your death.

status, veteran status, genetic information, military status, whether an employee has filed a charge of discrimination or any other status protected under applicable law. Conduct towards employees is considered harassment if it shows hostility towards a protected status and if it:

- ▲ has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- ▲ has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment opportunities.

Aspira is committed to maintaining respectful and congenial relationships between employees. Harassment, workplace violence, and threats of violence in any manner or form by anyone, including supervisors, co- workers, outside agency employees, vendors, customers, and/or visitors, is strictly prohibited and will not be tolerated.

All reported or suspected occurrences of discrimination or harassment will be investigated promptly, thoroughly, and as confidentially as reasonably possible. Where discrimination or harassment is determined to have occurred, Aspira will take disciplinary action, up to and including termination of employment. Aspira will not permit or condone any acts of retaliation against anyone who files harassment complaints in good faith or cooperates with a Company investigation.

COMPLAINT PROCEDURE FOR ALLEGATIONS OF DISCRIMINATION, HARASSMENT, OR MISCONDUCT

Aspira expects its employees, contractors, outside agency employees, and vendors to conduct business ethically, in accordance with Company policies and applicable law. As a result, Aspira requires all parties to immediately report any type of misconduct to their respective supervisor, Human Resources, or senior management. Reported allegations of misconduct will be promptly investigated in a fair and thorough manner, consistent with applicable law and Company policy.

Following the report of misconduct, please do not take any further action to investigate the reported activity. For every employee's safety, the respect for privacy, and to preserve the integrity of the investigation, all investigation activities must be coordinated by Human Resources and/or appropriate legal counsel. Aspira supervisors/managers have the additional obligation to immediately report any allegations or incidents of misconduct to Human Resources.

In a Company investigation, employee cooperation is required and confidentiality will be honored to the extent possible. In addition, the Company will not tolerate any retaliation toward an employee who cooperates with an investigation, or who, in good faith, reports suspected misconduct.

NON-FRATERNIZATION

Employees are discouraged from fraternizing or becoming romantically involved with other employees when, in the opinion of the Company, their personal relationships may create a conflict of interest, cause disruption, create a negative or unprofessional work environment,

or present concerns regarding supervision, favoritism, safety, security, and/or morale.

Furthermore, managers, supervisors, and non-supervisory employees are prohibited from working in a direct or indirect supervisory/subordinate capacity with any other employee with whom they are romantically involved.

Where employees or other workers become romantically involved with another employee or worker, and a direct or indirect supervisory/subordinate reporting relationship exists, all parties are required to immediately and fully disclose the relevant circumstances to Human Resources so that the Company may take whatever action is deemed appropriate. Failure to promptly disclose relevant circumstances may lead to disciplinary action, up to and including termination of employment.

IMMIGRATION LAWS

We are legally required to verify each new employee's identity and their authorization to work in the applicable country. All offers of employment are conditioned upon the receipt of satisfactory evidence of an employee's identity and legal authorization to work in the applicable country.

EMPLOYMENT VERIFICATIONS

Please direct all requests for employment verifications to HR@aspiraconnect.com.

EMPLOYEE REFERENCES

Please direct all employment references and verification requests to the Human Resources department. No manager or employee is authorized to release reference information for current or former employees of Aspira. The Company's policy for providing references for former or current employees is to disclose only the dates of employment and the title of the last position held. Where an employee has provided Human Resources with written authorization to disclose compensation information, Human Resources may also disclose base pay information.

EMPLOYMENT OF RELATIVES

Relatives of employees may be eligible for employment with Aspira only where related individuals do not work in a direct or indirect supervisory/subordinate capacity or where there is otherwise no conflict of interest. For purposes of this policy, relatives are defined as, but not limited to: spouses, ex-spouses, domestic partners, children, siblings, parents, grandparents, in-laws, and step-relatives. Present employees who marry will be permitted to continue working in their respective positions held as long as they do not work in a direct or indirect supervisory/subordinate capacity and there is otherwise no conflict of interest. In addition, managers and supervisors in a position to directly or indirectly influence personnel decisions are prohibited from promoting or advancing a relative or advocating such an action, on behalf of a relative.

CONFLICT OF INTEREST/OTHER EMPLOYMENT

Aspira is committed to conducting business in an ethical manner and in compliance with applicable laws and regulations. Employees are strongly encouraged to avoid situations in which their loyalties may be divided between Aspira's interests and their personal interests. Such activities may include, but are not limited to:

- Having a financial interest in the business of any Aspira customer, supplier, competitor, or agent;
- Accepting employment with any company that is doing or seeking to do business with Aspira;
- Accepting, directly or indirectly, any money or object of value from any person or enterprise that is doing or seeking to do business with Aspira;
- Disclosing any business secrets or other confidential and/or proprietary information in violation of the Confidentiality and Proprietary Information policy.

For more information, refer to Aspira's Code of Conduct.

SEPARATION OF EMPLOYMENT/RESIGNATION

Although not required by law, employees who voluntarily resign are asked to provide the Company with as much advance notice as possible prior to their intended termination. All employees must submit written notice to their Supervisor and the Human Resources department.

EXIT INTERVIEWS

Human Resources may conduct an exit interview to discuss an employee's reason(s) for leaving and any other feedback they may have about their experience at Aspira. During the exit interview, employees are encouraged to provide their perspective on any relevant areas for improvement needed within the Company.

RETURN OF COMPANY PROPERTY

Any Company property issued to an employee, such as software, computer equipment, mobile devices, databases, Secure ID tokens, files, keys, building access keys/cards, ID badges, parking passes, or company credit cards must be returned at the time the employee's employment is terminated. Employees are responsible for any lost or damaged items, and may be asked to reimburse the Company for the value of any property issued and not returned.

ON THE JOB

STANDARDS OF CONDUCT

- A. As part of our commitment to maintain a positive work environment, employees are expected to comply with Aspira's guidelines for workplace conduct and performance.
- B. Examples of impermissible job conduct are provided below. Please note this is not an exhaustive list of every type of impermissible conduct and any behavior that threatens the security, personal safety, or welfare of any employee or the Company's operations is also prohibited. Aspira reserves the right to administer corrective discipline in a manner it deems appropriate for the circumstances, and the following examples illustrate the types of behavior that could lead to disciplinary action, up to and including separation of employment:
- C. Unsatisfactory work performance and the failure to meet performance expectations, which includes inappropriate or otherwise unacceptable behavior or the violation of

- any Company policy, rule, or regulation.
- D. Damaging the property of the Company, a customer, or co-worker.
- E. Theft, including stealing or removing any property not owned by the employee, without express permission from the Company.
- F. Dishonesty in providing information to the Company or its customers. This includes, but is not limited to, falsification of time cards, expense reports, or any other records, or furnishing false information concerning absence from work.
- G. Possession of dangerous materials such as explosives, toxic, flammable substances, or weapons (except where allowed by law) on Company property.
- H. Failing to use required safety equipment, creating a safety hazard, or failing to report a safety hazard to management.
- I. The possession, use, or sale of illegal drugs or alcohol on Company premises, or working while under the influence of illegal drugs or alcohol.
- J. Disorderly or disruptive conduct, including but not limited to, fighting, derogatory name-calling, abusive or profane language, harassment, intimidation, coercion of coworkers, or threats of violence. Any mistreatment or otherwise unprofessional behavior toward customers or the visiting public also violates this rule.
- K. Insubordination, including but not limited to, the refusal of a work assignment, failure to work cooperatively with a supervisor or management representative, or failing to comply with a direct request from a supervisor, provided the request does not endanger the health and safety of that employee or others, and is not otherwise unlawful.
- L. Refusal or failure to cooperate with any investigation conducted by the Company, or dishonesty in providing information to the Company during the course of an investigation.
- M. Failure to maintain an acceptable level of dependability, including but not limited to: excessive unauthorized absence from work, repeated tardiness for scheduled work shifts, failure to timely notify the employee's supervisor of an absence, or failure to report to work at the conclusion of a Company-approved leave of absence.
- N. Actions which reasonably pose a security risk for the company, including but not limited to, providing or assisting with unauthorized access to Company premises or property or refusing to cooperate with safety/security related directives.
- O. The unauthorized use or disclosure of Company or customer proprietary or confidential information in violation of the Confidentiality and Proprietary Information policy.
- P. Use of Company communications systems, including but not limited to: telephone, mobile devices, e-mail, instant messaging (IM), facsimile, the Internet, the Company systems, voicemail, computers, modems, or systems software that violates any Company policy.
- Q. Failure to promptly report work-related accidents or property damage to the employee's manager or Human Resources.
- R. The conviction of a crime. Please note, this is limited under certain U.S. state and Canadian laws. Please contact a local Human Resources representative for more information.
- S. Other misconduct affecting the job, coworkers or customers, including but not limited to, unlawful discrimination, harassment, or retaliation.
- T. Sleeping or loitering during scheduled work time.
- U. Solicitations or distribution of any nature.

CODE OF ETHICS AND BUSINESS CONDUCT

The Code of Conduct has been adopted to provide guiding principles to all employees of Aspira and its direct and indirect subsidiaries in the performance of their duties. The basic principle that governs Aspira employees is that the Company's business should be carried on with loyalty to the interests of our customers, suppliers, fellow employees, strategic partners, and other business associates. The Company is committed to a high standard of business conduct. This means conducting business in accordance with the spirit and letter of applicable laws and regulations and in accordance with ethical business practices. Employees are required to review the Aspira Code of Conduct upon hire. Employees may obtain a copy of Aspira's Code of Conduct by contacting Human Resources.

At Aspira, each of us has a duty to report any known or suspected violation of Aspira's Code of Conduct, including but not limited to, violations of the law, rules or regulations, or Company policies. If an employee knows or suspects a violation of this Code, they must immediately report this to Human Resources. The Company will investigate and address reported concerns.

All reports of violations or suspected violations of the law or Aspira's Code of Conduct will be handled sensitively and with discretion. The Company will protect the employee's confidentiality to the extent possible, consistent with the law and the Company's need to investigate their concern.

RECORDING POLICY

It is a violation of Company policy to secretly record conversations with a tape recorder or other recording device unless prior written approval is received from an employee's supervisor or a member of upper-level management and all parties to the conversation give their prior written consent.

Violation of this policy may lead to disciplinary action, up to and including immediate termination.

ATTENDANCE POLICY

Regular and punctual employee attendance is critical to the success of the Company, and it is an essential function of every employee's job. We ask employees to strive for perfect attendance and to arrive for work on time for every scheduled shift. We recognize that, on occasion, an employee may not be able to come to work or need additional time before they arrive. Sickness and other emergencies cannot always be anticipated and may require an employee to miss part or all work day.

If an employee cannot report to work as scheduled, they must notify their manager no later than one (1) hour before the scheduled start time. If the need for time off is foreseeable, they must provide as much notice as possible. If an employee's need for time off is not foreseeable, they must provide as much notice as possible, but no less than one (1) hour prior to the employee's normally scheduled starting time. When an employee is unable to contact their supervisor themselves, they must have someone else do it for them. When an employee contacts their immediate supervisor they must be prepared to provide an estimate of the duration of their absence and when they expect to return or arrive for work.

Generally, for illness or injury related absences of three (3) or more consecutive workdays, an employee may be asked to provide written documentation from their health care provider to justify their absence. Likewise, written documentation from the employee's health care provider that releases them to return to work may also be required before the employee can resume working.

Excessive absences or tardiness have an impact on department and business operations, and may lead to disciplinary action, up to and including termination of employment. If an employee is absent from work for three (3) or more consecutive days without notice, please note that the Company will consider this a voluntary resignation of their position and will proceed with separation of employment. Nothing in the Attendance Policy should be construed, or will be applied, in a manner that interferes with employees' rights under the Americans with Disabilities Act, including the right of a disabled employee to receive a reasonable accommodation upon request.

For the Call Center Absence and Tardiness Policy, please see Appendix C.

APPEARANCE

Aspira hosts customers and prospects throughout our offices, and we are a professional organization. We need to dress the part! As a result, Aspira maintains a "smart casual" dress code. We want to keep our casual style, while being professional. We are refining our dress code as follows:

- Smart, stylish ensembles
- ▲ Blouses, polos, collared shirts and nice t-shirts
- Nice jeans, slacks, capris or dresses
- ▲ No flip flops please, nice sandals are fine
- ▲ No spaghetti straps, tank tops or strapless shirts unless covered
- ▲ No athletic attire including athletic shorts
- No sweatpants or yoga pants

Aspira prides itself on its casual atmosphere and the image that its employees present as representatives of the Company. Please report for work in presentable clothing and footwear. The expectation is that employees will maintain proper grooming and hygiene and dress in a manner consistent with our smart casual style. The smart casual style discourages flip flops, athletic wear, and spaghetti straps. Professional looking blouses, polos, collared shirts, and nice t-shirts are fine, as are jeans, capris, dresses, and nice sandals. Employees are encouraged to dress professionally when meeting with clients and other guests in the office. Attention should be paid to health and safety standards, Aspira's public image, and customer interaction. If an employee believes their circumstance require a reasonable accommodation, they must contact Human Resources.

CUSTOMER SERVICE

Aspira strives to provide internal and external customers with products and services of exceptional quality and value. In order to support a strong commitment to customer service, we ask all employees to:

Provide courteous service in a prompt and efficient manner.

- ▲ Establish and maintain positive relationships with customers. Earn their trust and respect through professional, honest interaction.
- A Handle complaints quickly and professionally. Never argue with a customer. If an employee is unable to resolve the complaint to the customer's satisfaction, they must immediately review the situation with their supervisor.
- ▲ Employees must communicate with customers in a professional manner, whether in person, over the phone, or via e-mail.
- ▲ Employees must remember that they represent Aspira. Our reputation and the customer's perception of the Company are based on interactions with the employee and other employees.

ACCEPTANCE OF GIFTS OR FAVORS

Employees are prohibited from soliciting or accepting any gift, favor, loan, gratuity, reward, promise of future employment, or any other thing of monetary value that might influence, or appear to influence their judgment or conduct in the performance of their job.

As a guideline, an employee may accept occasional, unsolicited courtesy gifts or favors (such as business lunches, tickets to sporting events or cultural events, holiday baskets, flowers, etc.), provided the gifts or favors have a market value under \$100, are customary in the industry and do not influence or appear to influence an employee's judgment or conduct. If an employee has questions concerning the receipt of gifts or favors, they can discuss them with their supervisor. Please refer to the Company Code of Conduct for complete policy details.

In addition, employees are prohibited from giving, offering, or promising anything of value, directly or indirectly, to any customer representative, potential customer, vendor or potential vendor, financial institution, or potential financial institution with whom Aspira has or may have a business relationship except as permitted by Aspira's Travel and Entertainment Policy and Code of Conduct.

USE OF ELECTRONIC MEDIA/SYSTEMS

Aspira aims to provide employees with the communication systems necessary to successfully perform their work. Employees are permitted use of Company property and must comply with Company policies and procedures regarding its use. Personal use of Company communication systems should be kept to a minimum and should in no event interfere with an employee's normal job duties or responsiveness and must adhere to all Company policies. Accordingly, employees are expected to adhere to proper use of all Company communication systems, which include but are not limited to, telephone, mobile devices, electronic mail (e- mail), instant messaging (IM), facsimile, the Internet, the Company's cloud content management/file sharing service, voicemail, computers, modems, and systems software.

The communication systems are owned and operated by Aspira and are to be used for Company business. As such, employees should have no expectation of privacy and their communications, and any data stored on Company communications systems, may be subject to review at any time by Aspira. For more information concerning the use of Company communication systems, please review the Electronic Communications Policy.

SOCIAL MEDIA GUIDELINES

Aspira utilizes social media to reach prospects and communicate with existing clients as a form of communication. In general, Aspira views social networking sites (i.e. Facebook, LinkedIn, etc.), personal web sites, and blogs positively and respects the rights of employees to use them as a medium of self-expression.



Employees have the responsibility of disclosing their relationship with Aspira on all blog posts, online videos, and social platforms when discussing products, brands, campaigns, and/or events from Aspira. The disclosure should be clearly visible in the relevant content. It is no longer sufficient to include a short disclosure in an employee's "about me" on all social profiles. The disclosure needs to be on every post an employee share about the company. Below are a few examples:

- ▲ If sending work-relevant tweets, a disclosure can be included in the tweet. Example: "Employee of @AspiraConnect.
- ▲ "Love working @Aspira! Check this out!" Link to content/event
- ▲ "Hey, I work for Aspira and" when responding to community members' questions or feedback.
- ▲ When posting to social platforms any of the following hashtags will suffice: #AspiraProud #AspiraCareers

Whatever employees choose to write or review, the outcome should always reflect their honest and truthful opinion and actual experience. When being completely honest, employees should ensure that they are not creating false claims around the products, brands, campaigns, events, or our competitors. When we engage with employees specifically about a product, brand, campaign, or event they are never required to create positive content about that product, brand, campaign, or event no matter the type of experience they may have with us. That is their choice and their opinion is their own. All employees should speak freely and share all feedback, including negative feedback.

We would not expect and do not want our employees to write about our competitors or compare our products, brands, campaigns, and events to our competitors.

All employees need to be conscientious regarding any personally identifiable information that they may receive or that they share. Be sure it complies with the company privacy policy as well as any applicable privacy policy for a social media site. Respect the copyrights, trademarks, rights of publicity, and other third-party rights in the online social media space, including with regard to user-generated content.

MEDIA RELATIONS

Only an Aspira Public Relations representative and select senior management staff are authorized to talk to the news media concerning Aspira. As a result, employees who are

approached by the media for interviews or comments should refer the inquiry directly to <u>PR@aspiraconnect.com</u>.

EMPLOYMENT RECORDS

The Company relies on every employee to ensure the information in their employee file is accurate and up to date. Although personnel files are the property of the Company, employees may request and obtain access to their file through a written request to the Human Resources Department. If an employee wishes to review their personnel file in person, they can make an appointment with their Human Resources representative, who will also be present during the review.

CONFIDENTIALITY AND PROPRIETARY INFORMATION

It is critical to ensure that confidential information regarding Aspira's and its clients' operations, activities, and business affairs are kept confidential to the greatest possible extent. If during the course of employment, an employee acquires confidential or proprietary information about Aspira, its business, or its customers, this information must be handled in strict confidence and is not to be discussed with outsiders. Aspira relies on its current and former employees for the internal security of such information.

As a condition of employment, employees are required to execute an agreement concerning the Company's confidential and proprietary information. "Confidential Information" refers to any information relating to the Company's business activities, client accounts, representative information, marketing and sales programs, financial projections, pricing formula, business plans, personnel data, product research and development, trade secrets, computer programs, security procedures, and any results of the Company's work which is not generally known outside of Aspira and has not been disclosed to the public by an authorized representative of the Company. All employees are required to keep Aspira's confidential and proprietary information confidential and not disclose the information to any unauthorized persons inside or outside of the Company, both during and after their employment.

BUILDING ACCESS & SECURITY

Aspira recognizes the need to protect the Company's assets, and in turn, to provide a comfortable and secure work environment. We ask employees to be knowledgeable about the security procedures for their respective facilities and to follow the guidelines concerning visitors and building access. Access badges or keys may be given to employees upon hire in certain facilities. Please take care to ensure that any access badges or building keys are not lost or misplaced. If an employee loses their badge or key, they can contact the Facilities team for a replacement and to ensure the previous badge is deactivated.

In order to deter unauthorized access by visitors and to protect our product development efforts, keypad locks or badge readers may be in place throughout the buildings, which require access codes or ID badges in order to enter certain areas.

Visitors are required to be accompanied at all times while on Aspira premises. Employees should welcome and escort their guest(s) to the proper destination and ensure that visitors are accompanied at all times. If employees see anyone unfamiliar wandering through an

Aspira facility or in a work area without an escort, they should ask the person if help is needed, and redirect him/her to the reception desk or to the facility's main entrance.

SEAT ASSIGNMENTS

Seat assignments contribute to maintaining office security and safety. In the event of an emergency during the workday, Aspira needs to be able to locate any given employee at any time. Seat assignments also allow for Aspira to maintain an accurate headcount of the employees in the building.

Each employee is assigned a seat on their first day. Aspira prohibits the changing or moving of seats without prior approval. If an employee needs to move seats, they must first request approval from their manager and then from the Facilities team. The Facilities team will work with the employee and the manager to find a new seat for the employee.

Non-Solicitation & Distribution

Aspira prohibits the solicitation of its employees in any way, including but not limited to, the collection of money, vending, posting or distributing bills, pamphlets, or other literature during work time or at any time in work areas. This is necessary to ensure a productive and harmonious work environment and to avoid the implication of Company sponsorship or approval of these activities.

SAFE WORKPLACE/WEAPON FREE POLICY

Aspira is committed to providing employees, customers, and others with whom we do business with a safe, comfortable, and secure environment. The Company has zero tolerance for violent acts or threats of violence. As such, Aspira expects employees to conduct themselves in a respectful, non-threatening, and non-abusive manner at all times. No direct, conditional, or veiled threat of harm or intimidation to any employee, customer, or anyone with whom we do business will be tolerated.

Employees have the responsibility to immediately report any threatening or violent behavior to their supervisor, Human Resources, or senior management. If an employee feels threatened and needs protection, they should not hesitate to report the situation to their supervisor or Human Resources.

The Company prohibits the possession or use of dangerous weapons on company property. Dangerous weapons include firearms, explosives, knives, and other weapons that might be considered dangerous or that could cause harm.

Pursuant to Section 30.06, Penal Code (trespass by license holder with a concealed handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not enter this property with a concealed handgun.

Pursuant to Section 30.07, Penal Code (trespass by license holder with an openly carried handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not enter this property with a handgun that is carried openly.

ACCIDENT PREVENTION AND SAFETY

In order to maintain a safe and healthy work environment, we ask that employees follow

these guidelines and procedures aimed at safeguarding themselves and their fellow coworkers:

- Obey the work safety rules and follow safety and security related job procedures at all times.
- ▲ Keep work areas clean and free from slipping or tripping hazards.
- Use assigned personal protective equipment.
- ▲ Immediately report equipment malfunctions or other hazards to the supervisor.
- ▲ Use care when lifting and carrying objects.
- △ Observe and honor any warning signs and take care in or around restricted areas.
- ▲ Be knowledgeable about emergency procedures.
- A Report any unsafe conditions to the supervisor.
- ▲ Immediately report any workplace accidents or injuries to the supervisor.
- ▲ If an employee is under the care of a health care provider for an injury or illness, they should follow their recommendations for care and treatment.
- ▲ Attend all employee safety meetings.

DRUG AND ALCOHOL POLICY

Aspira complies with government guidelines and recommendations for a drug-free workplace. The use of alcohol, illegal drugs, or controlled substances, whether on or off the job, can adversely affect an employee's work performance, endanger the safety and welfare of other employees, and expose the Company to potential property loss, damage, or injury to others. Aspira is committed to a workplace free of alcohol (apart from Company-sponsored functions) and drugs and aims to protect its employees, customers, and others with whom we do business from the effects of drugs or alcohol in the workplace.

Aspira prohibits anyone from being under the influence, purchasing, selling, distributing, or otherwise possessing alcohol, illegal, or controlled substances on Company premises. Likewise, the Company also prohibits employees from engaging in this behavior while on the job, when conducting Company business, or during non-working time to the extent that, in Aspira's opinion, it impairs employees' ability to perform on the job or threatens Aspira's reputation or integrity.

In order to enforce this policy and where there is reasonable suspicion, Aspira may conduct searches of Company property or the employee's personal property on Aspira or client premises, and may implement any other measures necessary to deter and detect abuse of this policy. In addition, an employee's conviction for the illegal sale or possession of a controlled substance off Company premises will not be tolerated because such conduct reflects adversely on the Company, even when not occurring on Company property. Please note that where the use of prescription or over-the-counter drugs impairs the ability to safely perform a job or affects the safety or well-being of others, employees must immediately notify their supervisor of such use before starting or resuming work.

ALCOHOL AND DRUG TESTING

Where there is a reasonable suspicion that an employee has violated Aspira's Drug and Alcohol Policy, and where lawful, the Company may require the employee to undergo an alcohol and drug test as a condition of continued employment. Positive test findings may result in disciplinary action, up to and including immediate separation of employment.

SUBSTANCE ABUSE EVALUATION AND TREATMENT

Aspira encourages employees with alcohol or drug dependencies to immediately seek treatment and professional assistance. If an employee has a chemical dependency and wish to voluntarily seek treatment to end that dependency, they should contact Human Resources to request a leave of absence. If granted, the leave will be unpaid and any treatment not covered under the group health plan will be at the employee's expense.

Please note that Aspira will not tolerate a violation of its Drug and Alcohol Policy, and the Company is not required to continue an employee's employment if they are found to be in violation of Aspira's policies.

SMOKE AND TOBACCO USE

Aspira prohibits the use of all smoke and tobacco products within the office. This includes, but is not limited to, chewing tobacco, electronic cigarettes, cigars, cigarettes, dips, and other smokeless tobacco products. Employees may use smoke and tobacco products in designated outside areas.

TRAVEL

From time to time an employee may incur expenses on Aspira's behalf for out-of-town business travel, local travel, business meals, and/or entertainment. Generally, Aspira will reimburse such expenses provided that they are properly documented, comply with Aspira's Travel & Entertainment Policy and applicable agency regulations, and are reasonable in nature. For more information about business travel, please review Aspira's Travel & Entertainment Policy. It is expected that non-exempt employees will not have business travel, local travel, business meals, and/or entertainment unless prior approval is given by the department's VP or Chief of their department or market.

RELOCATION

In the event Aspira offers an employee a relocation package, that employee is expected to remain employed with Aspira for a minimum of 12 months. If the employee resigns from Aspira employment or are terminated with cause within 12 months of the relocation payment, the employee will immediately pay Aspira the gross amount of relocation benefits received within 30 days of separation of employment.

WORK HOURS AND COMPENSATION

WORK HOURS AND COMPENSATION PRACTICES

Please see Appendix A for U.S. practices Please see Appendix B for Canada practices

COMPENSATION

Compensation may be determined by several factors such as: job responsibilities, performance, experience, education, training, skills needed to perform the job, other relevant skills, and cost of living in the geographical area. Aspira provides employees with a balanced approach of financial and non-financial rewards.

OVERTIME

Non-exempt employees may be required to work beyond their regularly scheduled workday from time to time. Compensation for overtime worked will be paid to eligible, non-exempt employees in accordance with applicable country, federal, provincial, and state law. Prior to working any overtime, non-exempt employees must have approval from the VP or Chief of that department or market. Working unscheduled overtime without prior authorization is a violation of the Company's policy. Employees will be paid for any unscheduled overtime worked without prior authorization, but may be subject to discipline for violating the Company's policy.

MEAL AND REST PERIODS

Meal and rest periods for non-exempt employees are provided in accordance with Company policy and applicable law. All non-exempt employees should work with their supervisor to schedule daily meal and rest periods. During a typical work day, non-exempt employees are expected to take a one hour (off-the-clock) meal break that can be taken at once or split into two 30-minute breaks.

WORK HOURS & SCHEDULES

Generally, the normal work week is a five (5) day period, Monday through Friday, and core business hours are 8:00am to 5:00pm. For the completion of timecards, the seven (7) day period that defines a workweek for purposes of pay calculation is Monday through Sunday.

Please note that various factors may require variations in an employee's work schedule and total hours worked each day or week. Some of these factors include workloads, operational efficiency, and staffing needs. From time to time, business needs may require that an employee's work hours are increased or decreased. Prior to working any overtime, non-exempt employees must have approval from the VP or Chief of that department or market.

Aspira believes we can optimize our opportunity for success by being ready, willing, and able to serve customers efficiently at any time, by competing fairly in the marketplace, and by producing a quality product. As a result, some areas of our business are in operation twenty-four (24) hours a day, seven (7) days a week so shift work or additional hours may be required to meet the needs of the customer.

TIMECARDS AND TIMEKEEPING

For non-exempt employees, the timecard is the record of hours worked and is the basis from which the Company computes the employee's pay. Non-exempt, hourly employees are

required to complete a timecard each pay period, by recording their own actual hours worked. Although timecards are submitted only once per pay period, non-exempt employees are expected to track their time on a daily basis and submit for review by their supervisor. The timecard must reflect work start and end time, meal period start and end time, any 30- minute break taken, any overtime worked and holidays and PTO taken. Non-exempt employees are paid for all hours actually worked as accurately reflected on their timecards.

REMOTE WORK

It is expected that all employees work in one of Aspira's corporate offices, unless the position is specifically intended to be a "remote" position, or unless remote privileges have been approved at the Executive level. Working remotely is not an employee right or benefit, and may be discontinued by the Company for any reason, at any time. Employees are required to review the Aspira Remote Work Policy upon hire. Employees may obtain a copy of Aspira's Remote Work Policy by contacting Human Resources.

To be eligible to work remotely, an employee must meet ALL criteria listed below. The employee must:

- 1. Be in a position that is "remote-eligible" as approved by the CEO
- 2. Hold a position that is classified as exempt from local and/or federal overtime/break requirements
- 3. Have a remote office and equipment suitable for working remotely including telephone, Internet access, supplies, etc.
- 4. Be able to work independently and productively

PERFORMANCE EVALUATIONS

Aspira's management team is committed to the success of the Company and its employees. To help continue to improve and recognize individual performance, an annual performance review program has been established to:

- 1. Measure an employee's overall contribution to the Company
- 2. Evaluate an employee's performance in order to recommend merit and/or promotion
- 3. Enhance two-way communication between an employee and their supervisor and identify expectations regarding Company, department, and individual goals and objectives

INTERNAL CAREER OPPORTUNITIES

Aspira aims to provide an environment which allows for personal growth and career advancement. To meet this goal, Aspira may hire from within as new positions become available. Current employees may be considered for other opportunities based on qualifications such as education and training, years of applicable experience, tenure in current position, overall performance, contributions made to the success of Aspira, and future potential. To apply for an open position, please refer to the Aspira Advancement Policy. Employees may obtain a copy of Aspira's Advancement Policy by contacting Human Resources.

It is possible that an opening will occur that requires specialized skills or talent, which do not currently exist within the Company. In such cases, the Company may hire someone from outside the Company.

BENEFITS AND LEAVES OF ABSENCE

BENEFITS AND OTHER SERVICES

Except where otherwise noted below in this section, eligibility for the following benefits is extended to the following employees: regular full-time employees who are regularly scheduled to work 30 or more hours per week, and full-time call center employees who are regularly scheduled to work 40 hours per week.

PAID TIME OFF (PTO)

Aspira believes that PTO is important to the health and well-being of our employees and encourages all employees to utilize their PTO days. PTO is available to eligible employees for approved absences including vacation, personal business, or personal or family illness. All planned time off must be approved by an employee's supervisor prior to taking the time. Aspira asks that all employees provide as much notice as possible, generally two (2) or more weeks, for any planned absence in order to allow for the proper distribution of work and to reduce interruption to the Company's operations. The Company reserves the right to refuse requests for PTO use and PTO requests made with little to no advance notice may not be approved due to business needs.

ELIGIBILITY

Eligibility for PTO is extended to all regular, full-time employees who are regularly scheduled to work 30 or more hours per week and full-time Call Center employees who are regularly scheduled to work forty 40 hours per week.

PTO RESPONSIBILITY

Management is responsible for ensuring that Company policy is followed in managing PTO and for making certain that absences are approved and do not adversely impact the daily operations of the Company. Employees are responsible for ensuring they provide sufficient notice, as soon as it is known, of any absence to their immediate supervisor. All time off must be approved by the manager and is not automatically approved without this authorization. Employees are also responsible for monitoring their current PTO balances and ensuring their available PTO hours are accurately tracked.

In certain circumstances, Aspira may allow employees to "borrow" up to 40 hours of PTO at the beginning of the calendar year that has not yet been earned provided that the employee will not be at a negative balance by December 31 of the current year. It is the responsibility of both the manager and the employee to ensure that PTO balances reflect zero hours by the end of the year. Employees should expect managers to decline any PTO request that will exceed the 40 hours borrowed. If an employee leaves the Company with a negative PTO balance, they will be expected to reimburse the Company for the full dollar amount of PTO days borrowed.

DIRECTOR LEVEL AND ABOVE PTO

There is no PTO accrual for employees at director level and above. Employees at director level and above are eligible to take time off as their work demands allow and as approved by their supervisor. Though employees at director level and above do not accrue PTO, they may be eligible for paid leave in certain circumstances.

PTO ROLLOVER

It is Aspira's policy that employees utilize all accrued PTO and end the year with a zero PTO balance. Where permitted by applicable law, any unused PTO will not rollover into the next calendar year.

TRANSITIONAL PTO

For employees relocating from a location where PTO rollover is permitted to a location where it is not allowed, PTO accrued while in the prior location will be considered Transitional PTO. Transitional PTO from locations that do not allow rollover PTO must be used prior to any newly accrued PTO.

For employees who move from below a director level position to a director level or above position, PTO accrued while in the below director level position must be used prior to the director level and above time off policy becoming effective for that employee.

PTO ACCRUAL

PTO does not accrue during leaves of absence nor is PTO earned for any overtime worked. Accrual begins on the first day of employment. PTO is accrued daily based on an 8-hour workday. Seasonal and part-time employees are not eligible for PTO benefits.

It is Aspira's policy that all PTO accrued should be used by the end of the fiscal year. Director Level and above employees should refer to the section for Director Level and Above PTO. For all other employees, PTO is earned at the following rates:

YEARS OF SERVICE (US)	ACCRUAL RATE (US)	DAYS EARNED/YEAR (US)	
Full-time: Regularly scheduled to work 40+ hours/week			
<3 years (0 to 35 months)	1.25 days per month	15 days per year	
3-5 years (36 to 59 months)	1.67 days per month	20 days per year	
5+ years (60+ months)	2.08 days per month	25 days per year	
Full time: Regularly scheduled to work 30-39 hours/week			
<3 years (0 to 35 months)	0.938 days per month	11.25 days per year	
3-5 years (36 to 59 months)	1.26 days per month	15 days per year	
5+ years (60+ months)	1.56 days per month	18.75 days per year	

GET LOST. GIVE BACK.

At Aspira, we are on a mission to cultivate a connected world through shared experiences. With that, we encourage our employees to take one day of year to Get Lost in an experience and another day to Give Back to their community.

Requirements:

- Only regular full-time employees are eligible to participate.
- ▲ Manager approval is required prior to taking a Get Lost or Give Back day. Upon receiving approval, send your manager a calendar appointment with said approval for the day you will be out of the office.
- Only hourly employees will need to record these days in ADP Workforce Now. Please code as "non-productive time" and add a comment of "Get Lost Day" or "Give Back Day" when submitting.
- Cannot be used on consecutive days.

HOLIDAYS

Please see Appendix A for U.S. practices Please see Appendix B for Canada practices

LEAVES OF ABSENCE

Aspira may grant leaves of absence to provide continuity of service when the leave is in the mutual best interest of the Company and the employee, or when such leave is required by applicable law. Leaves are reviewed on a case-by-case basis and are provided solely in the Company's discretion, except where otherwise required by law. Since Aspira operates in several countries, provinces, and states, leaves will be administered to conform to the relevant laws.

A leave of absence is required for any absence extending beyond five (5) consecutive work days, with the exception of pre-planned and approved PTO. For more information about leaves of absence, please review the Leaves of Absence Policy and contact a Human Resources representative.

If an employee wishes to request a leave, they will need to complete a leave of absence request form and return it to Human Resources, accompanied by supporting documentation, if required. All leave requests must be reviewed and pre-approved by Human Resources. If leave documentation is not provided within the required timeframe, the absence may be counted as unexcused, which may result in disciplinary action up to and including separation of employment.

Employees must receive prior approval or authorization for all leaves of absence, except where otherwise noted below. During an approved leave employees may not be gainfully employed elsewhere, including self-employment, unless specifically approved in advance by Aspira. Once an employee's approved leave expires, it is their responsibility to report to work on the next regularly scheduled work day. If an employee fails to return to work upon the expiration of an approved leave, Aspira will consider this to be a voluntary resignation and will proceed with separation of employment. If an employee's leave was for their own medical reasons and lasted for three (3) consecutive business days or longer, medical evidence of their ability to return to work and perform the essential functions of their role must be provided.

FAMILY AND MEDICAL LEAVE

Please see Appendix A for U.S. practices Please see Appendix B for Canada practices

BEREAVEMENT LEAVE

Benefits eligible employees may take up to three (3) days off with pay in the event of a death in their immediate family, to make arrangements or attend the funeral. Immediate family members include: legal spouse, children, parents (mother, father, parents in-law), siblings (brother, sister), brother-in-law, sister-in-law, grandparents, aunts, uncles, or legal guardians.

JURY/WITNESS DUTY

If employees are summoned for jury duty or subpoenaed to appear in a legal proceeding, Aspira will provide benefits eligible employees with up to five (5) days of paid time off per calendar year to attend court proceedings. Non-exempt employees will be paid the regular base earnings (or prorated salary) they otherwise would have earned had they worked, and

exempt employees will receive their regular pay during the absence. When employees receive their jury summons or subpoena, they must notify their supervisor and provide a copy of the document to Payroll. Once jury duty begins, employees must retain the court-issued jury time card, and provide it to Payroll upon completion of jury duty in order to receive the jury duty pay benefit. Employees may keep any monies paid to them for jury service.

VOTING IN PUBLIC ELECTIONS

Reasonable requests may be granted for time off to vote in state and national elections for employees who do not have sufficient time outside of working hours to vote. If polls are not open for at least two (2) consecutive hours outside of an employee's scheduled work hours, the employee will be given a reasonable amount of time off without pay to vote. Employees are required to notify their supervisors in advance, and present their supervisors with a voter's receipt after voting.

HEALTH INSURANCE PROGRAMS

Please see Appendix A for U.S. practices Please see Appendix B for Canada practices

ILLNESS AND INJURY PREVENTION

A safe and healthful work environment protects us and helps reduce incidents and resulting losses stemming from workplace accidents and injuries. It is also important to Aspira that we fulfill our obligations under applicable federal and state workplace safety laws and ensure that employees understand their role in preventing workplace injuries and illnesses. Aspira employees are responsible for complying with safe and healthful work practices and informing their supervisor about any workplace hazard without fear of reprisal. No matter how insignificant a workplace illness or injury may seem at the time of occurrence, employees must immediately notify their supervisor and Human Resources if and when this occurs.

WORKPLACE ACCIDENTS AND WORKERS' COMPENSATION

If employees experience a work related illness or injury, they should immediately inform their supervisor and Human Resources. Human Resources will work with them and their supervisor to make arrangements for medical care and provide them with information about the designated treatment center, if needed. In addition, employee will be provided with a Workers' Compensation claim form to complete and return to Human Resources.

Employees may designate the physician who treats them for work related illnesses or injuries (unless required by law to use a doctor in the Medical Provider Network (MPN)) by providing a written request with detailed information to Human Resources, no later than thirty (30) days following the injury. For more information about workplace accident reporting or Workers' Compensation, please contact a Human Resources representative. Canada-based employees should contact their Human Resources representative for information about practices in Canada.

EMERGENCY PREPAREDNESS & EVACUATION

Employees should use good judgment and common sense when faced with an emergency and/or evacuation. Most of our locations follow the policy of the building management company or landlord. Contact a Human Resources representative with any questions or for more information on how to proceed in different emergency situations.

INCLEMENT WEATHER

Aspira will make every effort to maintain normal work hours during inclement weather. When faced with inclement weather, the Company will follow the policy of the building management company or landlord in regards to office closure.

In the event the office does not close, employees unable to arrive for work on an inclement weather day will be required to use their PTO to cover their absence. If no vacation time is available, the nonexempt employee will not be paid for the day. All employees who are unable to report to work should call their department supervisor and report their absence at least one hour prior to the start of their work day, if they are able to reach a phone, or it may be considered an unexcused absence.

EMPLOYEE REFERRAL BONUS

The recruitment and retention of high caliber candidates is essential to the success of Aspira. Our employees are in the best position to share with prospective candidates outside the Company what it is like to work for Aspira. We encourage employees to refer qualified candidates for open positions. To recognize efforts in seeking and recommending individuals, Aspira maintains an Employee Referral Bonus Program. When an employee refers a candidate who is hired and begins working at Aspira, they may be eligible for a referral bonus. Please email HR@aspiraconnect.com for more information about this program.

TRAINING AND DEVELOPMENT

Aspira wants to provide employees with the tools to do their job, and understands that training and development programs assist employees with keeping their skills current. To take advantage of external training programs, employees must request approval from their supervisor and ensure the training content is directly related to the role and/or Aspira's business.

PARKING

Generally, there is ample employee parking surrounding the buildings we occupy. In the interest of common courtesy, Aspira asks employees to follow some basic parking principles: please do not park in spaces reserved for handicapped individuals or visitors, drive carefully in the parking areas, and park within the space allocated. The Company is not responsible for damage or loss to employee vehicles and care should be taken to ensure that vehicles are secured once parked.

Employees at director level and above will receive complimentary parking benefits. Please reach out to a Human Resources representative for more information

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

I acknowledge that I have received a copy of the Aspira Employee Handbook and applicable appendices, and I have read, understand, and agree to abide by the policies and procedures outlined therein.

This Handbook supersedes and replaces any previously issued Handbooks or summaries. I understand it is my responsibility to become familiar with its contents and to comply with its directives. In particular, I have read and understand the Employment at Will statement and Harassment Prevention Policy. I expressly acknowledge that nothing in the Handbook constitutes an employment contract. I understand that the Handbook, as well as any other policies or guidelines, may be modified at any time at the sole discretion of the Company. I understand that if I have questions about any information in this Handbook, I should immediately contact the Human Resources Department.

I further understand that my position, compensation, and duties may change at any time, in the Company's sole discretion. I acknowledge that no agreement contrary to the foregoing has been made with me and that no person other than the Chief Executive Officer has authority to enter into any agreement contrary to the foregoing and that any such agreement must be in writing.

I certify that I know of no current conflicts of interest which violate Company policy and that I will disclose any conflicts subsequently arising. I further promise to keep confidential all proprietary and confidential Company information and documents.

I HAVE CAREFULLY READ AND UNDERSTAND THE FOREGOING.

Employee Printed Name	
Employee Signature	 Date

APPENDIX A - U.S. EMPLOYEES

EMPLOYEE CLASSIFICATION DEFINITIONS

For purposes of pay administration and eligibility for overtime payments and employment benefits, the Company classifies its employees as follows:

- ▲ **Regular Full-Time** employees are regularly scheduled to work thirty (30) or more hours per week. Such employees may be "exempt" or "non-exempt" as defined below.
- ▲ **Regular Part-Time** employees are regularly scheduled to work fewer than (30) thirty hours per week. Such employees may be "exempt" or "non-exempt" as defined below.
- ▲ Call Center Full-Time employees are regularly scheduled to work thirty (30) or more hours per week and work in an Aspira call center exclusively.
- ▲ **Call Center Part-Time** employees are regularly scheduled to work fewer than thirty (30) or more hours per week and work in an Aspira call center exclusively.
- ▲ Temporary/Seasonal employees are temporarily engaged to work full-time or part-time for Aspira and payrolled through Aspira, with the understanding that their employment will be terminated no later than upon completion of a specific assignment. Please note a temporary/seasonal employee may be offered, and may accept, a new temporary assignment with the Company and still retain temporary status. Such employees may be "exempt" or "non- exempt" as defined below. Outside agency employees hired from temporary employment agencies for specific assignments are employees of their respective agency and not of the Company.
- Non-exempt: In accordance with applicable wage and hour law, employees who are required to be paid at least the minimum wage and overtime at the prescribed federal or state wage rate, whichever is higher. Non-exempt employees are paid by the amount of time worked, and generally work a prescribed work shift.
- ▲ **Exempt:** In accordance with applicable wage and hour law, employees who are exempt from minimum wage and overtime requirements. Exempt employees are paid a salary, and are expected to work the time needed to complete their work according to business needs.
- ▲ Inactive Status: Applies to employees who are not actively at work, such as those on Company approved leaves of absence. An employee on inactive status does not accrue such benefits as PTO and seniority.

EMPLOYMENT AT-WILL

Employment at Aspira is at-will. Employment at-will may be terminated with or without cause and with or without notice at any time by the employee or the Company. Nothing in this handbook or in any document or statement shall limit the right to terminate employment at-will. No manager, supervisor, or employee of the company has any authority to enter into an

agreement for employment for any specified period of time or to make an agreement for employment other than at-will.

AMERICANS WITH DISABILITIES ACT AMENDMENTS ACT (ADA AMENDMENTS ACT)

It is the policy of the Company to comply with all applicable provisions of the Americans with Disabilities Act (ADA), as amended. The Company will not discriminate against any qualified employee or applicant with respect to any terms, conditions, or privileges of employment because of a person's physical or mental disability. If an applicant or employee believes he or she requires a reasonable accommodation due to a disability, that individual should request such accommodation from a Human Resources representative. After an accommodation request is made, the Company will engage in a confidential, informal interactive process with the employee to determine the nature of their disability and the employee's needs. The Company will consider accommodation requests on an individualized basis. Reasonable accommodations may take a variety of forms, including, but not limited to, leaves of absence, or adjustments to work areas, equipment, policies, duties, and schedule. The Company will make reasonable accommodations as requested, provided that any accommodations requested do not impose an undue hardship on the Company, eliminate an essential job function, or create a direct threat to the health or safety of a Company employee or other person. If any Company policy or practice conflicts with this policy, this policy and the ADA will prevail.

HOURS AND COMPENSATION PRACTICES

PAY DAYS

All U.S. based employees are paid on a bi-weekly payroll schedule, with payday on every other Friday. Employees receive 26 paychecks a year with this pay schedule. Each paycheck covers work performed through the actual pay period ending date. Barring unforeseen circumstances, direct deposit funds are immediately available to employees on payday. Where direct deposit is not in place, paychecks are available by 12:00PM noon for pick-up at the corporate office or sent via U.S. Postal Service to the employee's home address on file.

HOLIDAYS

For U.S. based employees, Aspira grants 10 paid holidays annually to all regular-status employees. A schedule showing the specific dates of Company-recognized holidays is published and communicated to all employees each year. The Company may change observed holidays each year at its own discretion. Holidays typically observed are:

New Year's Day	Labor Day	Christmas Eve
President's Day	Thanksgiving Day	Christmas Day
Memorial Day	Day after Thanksgiving	New Year's Eve
Independence Day	zaj arter mannogring	

Regular part-time employees receive holiday pay on a pro-rated basis, based on average weekly hours worked. Non-exempt employees who work on a Company-recognized holiday will receive their straight-time rate of pay in addition to holiday pay for the hours worked that day.

LEAVES OF ABSENCE

FAMILY AND MEDICAL LEAVE (FMLA)

In conjunction with the federal Family and Medical Leave Act, Aspira provides up to 12 workweeks of unpaid leave in a designated 12-month period to eligible employees needing time off due to:

- 1. The employee's own serious health condition;
- 2. The birth of an employee's child, or the placement of a child with the employee for foster care or adoption, provided the leave is completed within 12 months of the birth or placement of the child with the employee;
- 3. Need to care for the employee's parent, spouse, son or daughter with a serious health condition; or
- 4. Military Exigency: a qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty or has been notified of an impending call or order to active duty, in the U.S. Armed Forces in support of a contingency operation

In addition, the Company provides up to 26 weeks of unpaid leave in a single 12-month period to eligible employees needing time off to care for a spouse, son, daughter, parent, or next-of-kin who is a member of the Armed Forces (including a member of the National Guard or Reserves) for the following purposes:

- 1. To care for an eligible family member who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is on the temporary retired list for a serious illness or injury.
- 2. To care for an eligible family member who is a veteran of the U.S. Armed Forces with a serious illness or injury, provided the veteran seeks medical treatment for a serious service-related illness or injury within 5 years of serving in the military.

Military Caregiver Leave, when combined with other FMLA-qualifying leave, may not exceed 26 weeks in a designated 12 month period.

ELIGIBILITY FOR FMLA

Regular full-time and regular part-time employees are eligible for Family and Medical Leave under the Family and Medical Leave Act, provided that on the date the employee begins leave:

- 1. Employee has been employed by the Company for at least 12 months; and
- 2. Employee has worked at least 1,250 hours during the 12-month period immediately preceding the commencement of leave.

For more information about FMLA, including length of leave, how pay and benefits are affected, notification requirements, and medical certification, please review the Leave of Absence Policy or contact a Human Resources representative. For additional information regarding the FMLA, please review the "Employee Right and Responsibilities Under the Family and Medical Leave Act" document on the following page.

EMPLOYEE RIGHTS UNDER THE FAMILY AND MEDICAL LEAVE ACT

THE UNITED STATES DEPARTMENT OF LABOR WAGE AND HOUR DIVISION

LEAVE ENTITLEMENTS

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

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

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

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

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

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

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

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

ELIGIBILITY REQUIREMENTS

BENEFITS &

PROTECTIONS

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

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

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

REQUESTING LEAVE

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

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

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

EMPLOYER RESPONSIBILITIES

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

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

ENFORCEMENT

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

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



For additional information or to file a complaint:

1-866-4-USWAGE

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

www.dol.gov/whd

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



WH1420 REV 04/16

STATE MANDATED LEAVES OF ABSENCE

Aspira complies with various state laws concerning leaves of absence. To the extent state law provides any greater rights, protections, or leave of absence benefits, those rights, protections and benefits are integrated into Company policy for those employees to whom they apply. If an employee believes they are entitled to any additional leave(s) of absence based on the state laws governing their work location, they should contact a Human Resources representative.

DISCRETIONARY LEAVE

The Company may grant an unpaid leave for compelling reasons that are not otherwise addressed or covered under other leave policies. Aspira offers two types of discretionary leave: (1) non-FMLA medical leave and

- (2) personal leave. Discretionary leaves are reviewed and granted in a maximum of 90-day increments. The following factors apply to the granting/non-granting of all discretionary leaves:
 - The impact on departmental productivity
 - Anticipated workload requirements
 - Overall employee performance and any pending corrective actions
 - ▲ Employee's attendance record
 - Employee's length of service
 - The reason for the request
 - △ Other leave time taken within the past 12 months

For more information about discretionary leaves of absence, please review the Leave of Absence Policy or contact a Human Resources representative.

MILITARY DUTY LEAVE

Aspira supports our employees who are members of the federal or state military forces. We grant military duty leaves in accordance with the Uniformed Services Employment and Reemployment Rights Act ("USERRA") and applicable state military leave laws. Military duty leave may not exceed 5 years cumulatively, with certain exceptions. The following military branches are considered Uniformed Services under USERRA:

- ▲ Army (includes reserves)
- Navy (includes reserves)
- Marine Corps (includes reserves)
- Air Force (includes reserves)
- Coast Guard (includes reserves)
- Army National Guard
- Air National Guard
- △ Commissioned Corps of the Public Health Service
- Any other category of persons designated by the President in time of war or emergency

Military service is defined as one of the following types of duty on a voluntary or involuntary basis:

- Active duty
- Active duty for training
- Inactive duty training
- ▲ Full-time National Guard duty
- Absences for examinations to determine fitness for duty

For more information about military duty leaves, please review the Leave of Absence Policy or contact a Human Resources representative.

HEALTH AND WELFARE BENEFITS

HEALTH INSURANCE PROGRAMS

Aspira provides eligible employees with a broad range of health benefits. Eligibility for health and welfare benefits is extended to full-time employees regularly scheduled to work 30 or more hours per week, as well as eligible dependents and spouses (with proof of marriage certificate). Coverage for these benefits is effective the 1st of the month following the employee's date of hire. Currently, Aspira shares in the premium costs for employees and their dependents to participate in the various plans offered. However, please note that Aspira reserves the right to modify these programs at any time. Presently, the following insurance plans are offered to eligible employees:

- Medical insurance
- Health Savings Account (HSA) Dental insurance
- Vision insurance
- ▲ Group Term Basic Life
- Accidental Death & Dismemberment (AD&D) Insurance Optional Life Insurance
- ▲ Long Term Disability
- ▲ Short Term Disability Supplemental Insurance Programs Employee Assistance Program Flexible Spending Accounts (FSAs) Pet Insurance
- Legal Insurance

For more information about health benefits, please email Benefits@aspiraconnect.com or go to the Company's benefits website. In all cases, the terms of the full plan document will govern in the event of a conflict, ambiguity, or omission in any summary of any benefit plan, including the Summary Plan Description or any overview contained in this Handbook.

Benefits Website for US-Based Employees:

https://aspira.benefitmain.com/

Username: raoutdoors Password: benefits

401(K) PROGRAM

U.S employees who are at least 18 years of age, and not non-resident aliens, may participate in Aspira's 401(k) plan. Employees may invest a percentage or dollar amount of their salary in several investment funds offered through the Company's 401(k) plan administrator, and the funds offered vary in risk and return potential. For more information about Aspira's 401(k) plan, please email Benefits@aspiraconnect.com or go to the Company's benefits website. In all cases, the terms of the full plan document will govern in the event of a conflict, ambiguity, or omission in any summary of any benefit plan, including the Summary Plan Description or any overview contained in this Handbook.

ADDITIONAL INSURANCE PROGRAMS

Aspira employees may also be eligible for additional benefits under the following insurance programs:

Workers' Compensation Insurance

▲ Benefits are administered on a state-by-state basis

State Disability Insurance

▲ For eligible employees who work in a state that provides this insurance benefit and contribute to the program via payroll deductions

Social Security

▲ For more information about Social Security, please visit <u>www.ssa.gov</u>

COBRA Health Insurance Continuation

▲ For benefit-eligible employees who lose coverage under the Company's group health plan

Unemployment Insurance

- ▲ Benefits are administered on a state-by-state basis
- ▲ For unemployment due to qualifying reasons

APPENDIX B - CANADA-BASED EMPLOYEES

EMPLOYEE CLASSIFICATION DEFINITIONS

For purposes of pay administration and eligibility for overtime payments and employment benefits, the Company classifies its Canada-based employees as follows:

- ▲ **Regular Full-Time** employees are regularly scheduled to work thirty (30) or more hours per workweek. Such employees may be "exempt" or "non-exempt" as defined below.
- A Regular Part-Time employees are regularly scheduled to work fewer than thirty (30) hours per workweek. Such employees may be "exempt" or "non-exempt" as defined below.
- ▲ Temporary/Seasonal employees are temporarily engaged to work full-time or part time for Aspira and payrolled through Aspira, with the understanding that their employment will be terminated no later than upon completion of a specific assignment. Please note a temporary/seasonal employee may be offered, and may accept, a new temporary assignment with the Company and still retain temporary status. Such employees may be "exempt" or "non-exempt" as defined below. Outside agency employees hired from temporary employment agencies for specific assignments are employees of their respective agency and not of the Company.

Province of British Columbia:

- Non-exempt Employees who are required to be paid overtime and statutory holidays in accordance with the British Columbia Employment Standards Act.
- ▲ **Exempt** Employees who are not required to be paid overtime and statutory holidays for work performed beyond forty hours in a workweek in accordance with the British Columbia Employment Standards Act.

▲ Province of Ontario:

- ▲ Non-exempt All other employees who are not categorized as exempt as defined below in accordance with the Employment Standards Act, 2000. Non-exempt employees require payment of overtime or time-off-in-lieu as per the Act.
- ▲ Exempt Employees who are not required to be paid overtime for work performed beyond forty-four (44) hours or covered for maximum hours of work per workweek in accordance with the Employment Standards Act, 2000.
- ▲ **Probationary Period:** Applies to employees who have not yet completed 90 days (or 3 months) of continuous employment with Aspira. During this time, new employees and the Company have an opportunity to evaluate one another and determine the employee's compatibility, ability, and interest in the job. The length of the probationary period may be extended if the Company deems such an extension necessary or appropriate at its sole discretion. Completion of the probationary period does not entitle an employee to remain employed by Aspira for any definite period of time. Both

the employee and the Company are free, at any time, with or without notice and with or without cause, to end the employment relationship.

▲ **Inactive Status:** Applies to employees who are not actively at work, such as those on Company approved leaves of absence.

TERMINATION OF EMPLOYMENT

The Company may terminate an employee's employment at any time and for any reason, with or without just cause. If an employee's employment is terminated for just cause, the employee shall not be entitled to notice of termination, pay-in-lieu thereof, severance pay of any kind, nor any unpaid bonuses, whether pursuant to statute, common law, or otherwise. Should the Company terminate an employee's employment at any time without just cause, the employee shall be entitled to reasonable notice equal to the specific amounts set out by the applicable province's Employment Standards Act legislation.

HOURS AND COMPENSATION PRACTICES

PAY DAYS

All Canada-based employees are paid on a biweekly payroll schedule, with payday every other Friday. Employees receive 26 pay cheques a year with this pay schedule. Each pay cheque covers work performed through the past two weeks of service pay period ending date, with a one week delay. Barring any unforeseen circumstances, direct deposit funds are immediately available to employees on payday. Pay cheques are available on the Friday of payday at an employee's respective office, through an online payroll-provider portal, or in the case of workfrom-home employees, sent via Canada Post to the employee's home address on file.

HOLIDAYS

For Canada-based employees, Aspira grants paid holidays annually to all regular status employees. A schedule of the Company recognized holidays is published and communicated to all employees each year. Holidays typically observed are those set out by the respective province's Employment Standards Act legislation. Company-recognized holidays are paid in accordance with the respective province's Employment Standards Act legislation. Holidays typically observed are:

British Columbia	Ontario
New Year's Day	New Year's Day
Family Day	Family Day
Good Friday	Good Friday
Victoria Day	Victoria Day
Canada Day	Canada Day
B.C. Day	Civic Holiday
Labour Day	Labour Day
Thanksgiving Day	Thanksgiving Day
Remembrance Day	Christmas Day
Christmas Day	Boxing Day

LEAVES OF ABSENCE

CANADA LEAVES OF ABSENCE

In conjunction with country and provincial law, Aspira provides leaves of absence to eligible Canada-based employees needing time off due to:

- 1. The birth of an employee's child or to care for the newborn child;
- 2. The placement of a child with the employee for adoption;
- 3. The care of an employee's spouse, child, or parent ("family member") who has a serious health condition; or
- 4. The employee's health condition, where the employee is medically incapacitated from working.

A qualifying health condition is an illness, injury or quarantine that involves either inpatient care or continuing treatment by a health care provider.

PARENTAL LEAVE

Aspira grants pregnant employees to take up to 17 weeks of unpaid leave. Pregnancy leave is typically combined with parental leave (which is 35 to 37 weeks), for a total of 52 weeks of jobprotected, unpaid leave. Employees taking only parental leave are entitled to between 35 and 37 weeks of unpaid leave.

During parental leave, Aspira health insurance and other benefits coverage continue, provided the employee continues to pay any employee portion of the premium. Employees continue to earn credits towards length of employment, vacation, and seniority during periods of leave.

ELIGIBLE EMPLOYEE

Both new parents have the right to take parental leave. A new parent is entitled to parental leave whether he or she is a full-time, part-time, regular status or contract employee. In Ontario, the employee must also be employed for at least 13 weeks before commencing parental leave in order to be eligible. In British Columbia, there is no such qualifying period.

A "parent" includes:

- A birth parent;
- An adoptive parent, whether or not the adoption has been legally finalized; or
- A person in a relationship of some permanence with the parent of the child, and who plans on treating the child as his or her own. This includes same-sex couples (in Ontario).

EMPLOYEE NOTIFICATION REQUIREMENTS

Where an employee plans to take parental leave, the employee must notify Aspira of the intention to take leave at least 2 weeks in advance of the expected leave and must provide any required medical certification. If the need for leave is not foreseeable, the employee must provide notification of leave to the Company as soon as is practicable under the circumstances. Employees are encouraged to provide the Company with advance notice of the date they will begin their leave both verbally and in writing.

PERSONAL EMERGENCY LEAVE (ONTARIO ONLY)

Employees, whether employed on a full-time or part-time basis, may be granted up to 10 days of unpaid, job- protected leave every calendar year due for:

- Personal illness, injury or medical emergency, or
- Death, illness, injury, medical emergency or urgent matter relating to the following family members:
 - A spouse, which includes both married and unmarried couples, of the same sex or the opposite sex;
 - A parent, step-parent, foster parent, child, step-child, foster child, grandparent, step-grandparent, grandchild or step-grandchild of the employee or the employee's spouse;
 - ▲ The spouse of an employee's child;
 - ▲ A brother or sister of the employee; and
 - A relative of the employee who is dependent on the employee for care or assistance.

EMPLOYEE NOTIFICATION REQUIREMENTS

Generally, an employee must inform Aspira before beginning a leave. If an employee's need for leave is unforeseen, such as a personal emergency leave, the employee must inform the Company as soon as possible. In these instances, verbal notice is sufficient. However, Aspira will require an employee to provide written documentation to substantiate the need for leave.

FAMILY RESPONSIBILITY LEAVE (BRITISH COLUMBIA ONLY)

An employee is entitled to up to 5 days of unpaid leave in each employment year to meet responsibilities related to the care, health, or education of any member of the employee's immediate family; which includes:

- Spouse;
- ▲ Child;
- Parent:
- ▲ Guardian:
- Sibling;
- ▲ Grandchild; and
- △ Grandparent of an employee, and any person who lives with the employee as a member of the employee's family.

COMPASSIONATE CARE LEAVE

An employee may take up to 8 weeks of unpaid leave within a 26 week period to care for or support a gravely ill family member. The employee must provide Aspira with a medical certificate which states that the family member is gravely ill with a significant risk of death within the 26 week timeframe.

COMPASSIONATE CARE ELIGIBILITY

All Canada-based employees, whether full-time or part-time, are entitled to this leave. The specified family members for whom a compassionate care leave may be taken are:

- ▲ The employee's spouse (including same-sex spouse);
- ▲ A parent, step-parent or foster parent of the employee or employee's spouse;

- A child, step-child or foster child of the employee or the employee's spouse; and
- Anyone considered a close relative of the employee, irrespective of whether they are related by blood, adoption, marriage or common law partnership.

ORGAN DONOR LEAVE (ONTARIO ONLY)

Organ donor leave is unpaid, job-protected leave of up to 13 weeks, for the purpose of undergoing organ donor surgery and subsequent organ donation.

ORGAN DONOR ELIGIBILITY

All Canada-based employees, whether full-time or part-time, are entitled to this leave, provided that the employee was employed for at least 13 weeks with the Company prior to commencing leave. The employee must be undergoing surgery to donate all or part of one of the following organs to another person:

- Kidney
- Liver
- Lung
- Pancreas
- ▲ Small bowel

EMPLOYEE NOTIFICATION REQUIREMENTS - ORGAN DONOR LEAVE

To request an organ donor leave, the employee must provide the Company with at least 2 weeks' written notice prior to the anticipated leave start date, or must provide notice when reasonably able to do so. In addition, the employee must provide a medical certificate to the Company as soon as possible following the request for leave.

RESERVIST LEAVE

An employee who is a reservist is entitled to unpaid leave if the employee is deployed to a Canadian Forces operation outside Canada, is engaged in pre or post-deployment activities either inside or outside Canada, or is deployed inside Canada to assist in dealing with an emergency or its aftermath.

EMPLOYEE NOTIFICATION REQUIREMENTS

An employee must provide the Company with at least 4 weeks' prior written notice (British Columbia) of the date the leave will begin and end, or must provide notice when reasonably able to do so (Ontario).

ELIGIBLE EMPLOYEE

In order to be eligible for reservist leave in Ontario, the employee must have worked for the Company for at least 6 consecutive months. Please note there is no qualifying period in British Columbia. Aspira is not required to continue coverage under Company benefit programs during the employee's leave. However, employees continue to earn credits towards seniority and length of service during periods of leave.

HEALTH AND WELFARE BENEFITS

HEALTH INSURANCE PROGRAMS

Aspira offers a Company health insurance program for all regular status, full-time employees. After the probationary period, the Company pays the benefit premiums. Please note that Aspira pays the premium for most health benefits, but not for the long-term disability and life insurance benefit. This is to ensure that any long-term disability claims initiated by the employee would be paid to the employee on an after-tax basis.

Insurance plan booklets and other information are provided to each employee at the time of enrollment and can be requested at any time by contacting Human Resources. The benefit documents describe the various benefits and the coverage provided. Aspira reserves the right to change or modify these programs as necessary.

Currently, the following health insurance benefits are offered to eligible Aspira employees:

- ▲ Extended Health insurance
- Dental insurance
- ▲ MSP Administration for British Columbia employees
- ▲ Group Term Life insurance equivalent to two times annual salary (to maximum of \$450,000 CAD) Accidental Death & Dismemberment (AD&D)
- ▲ Optional Life Insurance
- Optional Accidental Death & Dismemberment Optional Critical Illness
- ▲ Long Term Disability
- ▲ Supplemental Insurance Programs Employee Assistance Program

Employees Eligible for LTD will continue to participate in the Group Benefit Plan for up to a maximum of two years on the anniversary date of leave.

REGISTERED RETIREMENT SAVING PLAN (RRSP) PROGRAM

Upon completion of the probationary period, all Aspira Canada-based employees may start or continue saving for their retirement by participating in Aspira's RRSP program. Employees may invest a percentage of their pay in several investment funds offered through the Company-approved financial plan administrator. The investment funds provide a variety of risk and return combinations from which to choose. An employee may enroll or change their level of contribution on a monthly basis. It is the employee's responsibility to ensure they are not exceeding their contribution limit for the year.

APPENDIX C - CALL CENTER EMPLOYEES

CALL CENTER ABSENTEE AND TARDINESS POLICY

Due to the nature of the contracts and service level agreements for our customers, it is critical that our call centers be staffed with employees who are present and engaged to work during their assigned work shifts. As such, it is necessary to monitor absenteeism and tardiness in the call centers we operate. Employees should take the time to review and make sure they understand these requirements. If employees have any questions about these requirements or need clarification, they should ask their supervisor or a Human Resources representative.

Aspira relies on our Call Center employees to be on time for their daily scheduled work shifts and to work their full, assigned shifts. If an employee is going to be late or absent from work, they must notify their supervisor or team lead with as much notice as possible: ideally at least 1 or more hours before the scheduled start time, but no later than 30 minutes after the scheduled start time. To notify a supervisor or team lead, please contact him/her using the designated phone number for the location or department. Please note that attempting to notify a supervisor or team lead by calling an undesignated phone number or by giving untimely notice is not considered proper notification. With respect to tardiness, an employee will be considered tardy if they are not clocked into our payroll system and available to accept phone calls at the start of the employee's assigned work shift. However, an employee may clock in up to 5 minutes before their assigned work shift, in order to ensure they are ready to begin taking calls on time.

With respect to absences, excessive, unscheduled absences or tardiness may result in disciplinary action, up to and including separation of employment. "Excessive" is defined as 10 or more days of absence or tardiness within a 12 month period. Please note if an employee is absent for 3 or more consecutive workdays and fail to timely and properly report their absence(s) to their supervisor or team leader, Aspira may consider this job abandonment and proceed with a separation of their employment.

Aspira employees unable to meet the attendance requirements outlined above may be subject to a progressive improvement plan notice. With respect to attendance issues, performance requirements are generally reviewed with affected employees at the following unscheduled absence or tardiness intervals: 3, 6, and 9 unscheduled absence and/or tardiness occurrences. If an employee does not provide adequate notice to their supervisor in regards to their unscheduled absence, the absence will be considered a No Call/No Show. One No Call/No Show will immediately move the employee to the next level in the progressive improvement plan.

PROGRESSIVE IMPROVEMENT PLAN

To ensure employees receive consistent feedback and timely notification of performance, conduct, errors, and attendance violations and to further ensure clients and customers are provided the expected quality from our call centers, Aspira uses a progressive disciplinary plan.

The progressive disciplinary plan issues disciplinary action regardless of the type of occurrence to ensure efficiency of communication, documentation, and tracking. An

occurrence is any actionable event that constitutes a failure to meet the expected level of performance. An occurrence stays in effect for 6 months. If the employee incurs no other occurrence for a 6 month period, all previous occurrences expire and are null and void.

While the Company reserves the right to omit all or any step of the Progressive Improvement Plan, the counseling process tends to follow this sequence: Coaching, Action Plan, Written Warning, Final Written Warning. Any occurrence incurred by the employee following a Final Written Warning is grounds for termination. Action Plans and Warnings require immediate employee and manager signature and submission to HR. The signature does not attest agreement. If the employee resists signing the Action Plan or Warning, they are waiving their ability to comment on the incident.

RELEASE PROCESS FOR CALL CENTERS

Occasionally our call centers must close and cease operating due to inclement weather or other situations as determined by Aspira management, or require that a number of employees leave early based on business need. In the event of a facility closure, the following process will be followed:

- ▲ Where possible and practicable, those employees affected will be called and notified of the facility closure and told to remain at home and not attend work. In these instances, the time will be unpaid and regular full-time employees may use PTO if available.
- ▲ Employees already at the workplace will be informed of the closure, notified to leave the premises and paid a minimum of ½ their regularly scheduled work hours for that day.
- ▲ In the rare event of unusually low call volume, it may be necessary to reduce the number of call center employees on duty and instruct certain employees to leave early. In these instances, the following process will be followed:
- ▲ Employees volunteering or requesting to leave early will be given priority in leaving early for the day.
- Other work may be made available, such as coaching, quality assurance, focus groups, or agent support.
- ▲ Employees who are released early will not be paid for the hours not worked, however, regular full-time employees may use available PTO to receive pay for the hours not worked.

CUSTOMER RELATIONS

Aspira is committed to providing our customers with products and services of exceptional quality and value. As part of this commitment, we expect the following from our employees:

- ▲ Provide courteous service in a prompt and efficient manner.
- ▲ Establish and maintain positive relationships with customers; earn their trust and respect through professional, honest interaction.
- A Handle complaints quickly and professionally; never argue with a customer; if unable to resolve a complaint to the customer's satisfaction, immediately review the situation with the supervisor.
- △ Communicate with customers in a professional manner, whether in person, over the phone, or in e-mail.

▲ Employees must remember they are representing Aspira; our reputation and the customer's perception of the Company is based on their interactions with all Aspira employees.

TELEPHONE ETIQUETTE WITH CUSTOMERS

Aspira recognizes that employees interact with a variety of customers over the phone and wants every employee to be successful. The following guidelines were developed to assist Aspira employees in working with customers:

- ▲ Utilize and refer to scripts, policies, or Company documents to ensure you are providing accurate and complete information.
- ▲ Be courteous, friendly, enthusiastic, and engaged.
- Genuinely assist customers and go above and beyond to help them.
- ▲ Be fair, respectful, and discrete with customer requests.
- ▲ Listen carefully to customers for a thorough understanding of their needs.
- Respond with empathy when unable to grant a customer's request.
- Avoid excessive time spent on hold, awkward pauses, and the use of slang.

CELL PHONE/ELECTRONIC DEVICE POLICY

We are committed to maintaining an environment where customer proprietary and confidential information is secure. One of the ways to ensure this is to prohibit cell phone/electronic device use in the call center area.

- ▲ Cell phones/electronic devices are to be powered off and unseen.
- △ Cell phones are not allowed in the call center area at any time or for any reason. Cell phones must be turned off (including vibrate mode) and kept in a pocket or purse. They cannot be in an employee's hands or on the desk while in the work area. Cell phones may be used on an employee's break or lunch in areas of the building. The same rules apply to any other electronic devices.
- ▲ Failure to adhere to this policy may subject employees to the Company's standard coaching/disciplinary process up to and including separation of employment.

E-MAIL AND SKYPE FOR BUSINESS POLICY

E-MAIL – Employees are required to check their e-mail no less than hourly during your shifts for updates that have been sent by management or to view announcements or alerts. It is crucial that employees check their e-mail since this is how important business rule and policy information will be dispersed to all employees.

SKYPE – Employees will be responsible for logging into Skype at the beginning of their shift and keeping it up at all times until their shift has ended.

Both e-mail and Skype are only to be used for work purposes. If employees are found abusing this policy they will be subject to disciplinary action up to and including separation of employment. Team leads may check to make sure employees are using their e-mail and that they have Skype up at all times.

TELEPHONE MONITORING POLICY AND RELEASE

Aspira has a telephone monitoring policy for all employees. All employee conversations while using the telephone system at Aspira may be monitored or recorded. Aspira's policy ensures that customers receive a high level of service and helps to improve employee performance.