



General Employee Handbook

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An electronic version of this Handbook is provided when an employee is hired at Creospan, Inc. Printed copies of this Handbook are Company property and should not be shared with others outside the Company. Employees should feel comfortable reviewing the Handbook at work and during non-working hours, as it has been designed for that purpose.

For questions regarding the Handbook's contents or the interpretation of this Handbook, please contact Human Resources at hr@creospan.com.

THIS EMPLOYEE HANDBOOK IS PROVIDED AS A GUIDE AND DOES NOT CREATE EITHER AN EXPRESS OR IMPLIED CONTRACT OF EMPLOYMENT OF ANY SPECIFIC DURATION.

ALL EMPLOYEES OF CREOSPAN ARE "AT WILL" EMPLOYEES—WHICH MEANS THAT EITHER THE COMPANY, OR THE EMPLOYEE HAS THE RIGHT TO TERMINATE EMPLOYMENT ANY TIME AND FOR ANY REASON NOT OTHERWISE PROHIBITED BY LAW. NOTHING IN THIS HANDBOOK CHANGES THE "AT WILL" EMPLOYMENT RELATIONSHIP.

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Welcome

Dear Creospan Employee and Team Member,

Welcome to Creospan! It is a pleasure to have you with us. To you and many others who will and have helped make this a company to be proud of, we offer our sincere gratitude for the excellence of your work.

This handbook briefly describes and outlines the personnel policies, practices, and benefits that are of interest to each of us. The policies, which are intended to serve as guidelines, are sufficiently flexible to accommodate special circumstances and create a fair environment in our growing company.

We hope that you will find your work stimulating, challenging and rewarding. It is our intent to foster compensation, benefits, an environment of support that leads to job satisfaction, personal fulfillment, career growth, satisfied client relationships and a profitable company.

If you find that your specific questions or concerns have not been answered in this document, please feel free to discuss them with your Creospan supervisor or Human Resources.

Sincerely,

Praj Shah
CEO

COMPANY MISSION

Creospan is committed to providing technological solutions of the highest quality with an acute understanding of current and future customers' needs. We pride ourselves in empowering our employees to create an innovative and diverse culture with a professional commitment to our work. We hold ourselves accountable for our actions in the workplace and community.

COMPANY HISTORY

Founded in 1999, Creospan, Inc. is an Information Technology & Engineering Consultancy firm that assists organizations in evaluating & building technology-based solutions. From custom software development to ideation and design, Creospan provides consulting, staffing, turn-key projects and system integration services to meet the needs of our clients, who range from industry leaders to small innovative organizations.

We take the current needs of our clients and use cutting-edge information techniques, methodologies, and innovations to provide value-driven solutions through technological advancements, industry best practices and first-hand experiences. A successful and growing organization, Creospan services clients with a mix of strategy, architecture, design, engineering/development and testing services.

INTRODUCTION TO THE HANDBOOK

This Employee Handbook (the "Handbook") is intended to help new and current employees become familiar with the policies, procedures, and business culture of Creospan.

Within this Handbook and its attachments, references to Creospan, the Company, we, us, or our, means Cyberbridge International, Inc. d/b/a Creospan, Inc. and its physical worksites, as applicable.

The contents of this Handbook are general guidelines of our current policies and should not be confused for a contract between the Company and its employees. Nothing in this Handbook, as it now exists, or may in the future be revised, is intended or should be construed as a contract of employment or a promise of employment for a specific period of time.

Any aspect of employment with the Company which does not appear in the Handbook should be addressed with a supervisor or Human Resources.

Policy Changes and Handbook Revisions

Creospan will seek to provide employees with notice when a policy or benefit is expected to change. However, the Company may choose for its own reasons, at any time and with no prior notice, to amend, suspend, add, remove or otherwise modify any or all content in this Handbook to meet legislative, economic, financial, or other conditions, as needed. Current regulations and benefits required by law will always remain in force. In addition, if any provision in this Handbook is found to be unenforceable or invalid, such finding will not invalidate the other provisions of the Handbook.

Amendments to the Handbook will be made available to employees, and employees will be notified once such amendments are incorporated.

State Requirements

Creospan has employees in many states. This Handbook applies to all Creospan employees—no matter the state in which they work. However, some states may have employment legislation that may differ than Illinois. If you feel a state law differs from anything in this handbook, contact Human Resources for clarification. Employees are required to read, become familiar with, and abide by the guidelines in this Handbook.

Application of Policies to Client's Workplace

Creospan's employees often work at the site of a client. The policies contained within this Handbook also apply to employees that work on a client's property.

Creospan and Client Relationship

This Handbook provides guidelines for employees while working for Creospan—whether or not the employee works at a Creospan facility or a client's facility. However, nothing within this Handbook should be interpreted to mean that any Creospan employee is also employed by a Creospan client. You are employed solely by Creospan as an at will employee. A client does not have the authority to hire, fire, promote, transfer, or make any other tangible employment decision in regard to your employment with Creospan. In cooperation with Creospan, a client may provide input to your Creospan supervisor about your work performance and may provide guidance to you about the work that they need you to perform. But at all times, Creospan is the ultimate decision maker in regard to your employment.

If there is ever confusion about the guidelines in this Handbook related to your client, you should immediately contact your Creospan supervisor or Human Resources at hr@creospan.com.

Moreover, if a client, or an agent of a client, is acting in a way that, if the client or agent was an employee of Creospan, would violate the harassment, discrimination, equal opportunity, or any other policy under this Handbook then you should immediately report such conduct to your

Creospan supervisor or Human Resources at hr@creospan.com. Creospan will immediately investigate the issue and advise you of the result.

Creospan prohibits retaliation for making such complaints or cooperating in any such conduct. If you feel that you have been retaliated against for making a lawful complaint under this Handbook by a Creospan employee or a client, you should immediately contact your Creospan supervisor or Human Resources at hr@creospan.com.

Business Ethics and Conflicts of Interest

Creospan is committed to achieving the highest standards of professionalism and ethical conduct in its operations and expects its employees to conduct their business according to the highest ethical standards of conduct and to comply with all applicable laws. This policy is intended to increase awareness of potential conflicts of interest and establish a procedure for reporting them.

Creospan prohibits all employees from using their position with the Company, or the Company's relationship with its clients, for private gain or to obtain benefits for themselves or members of their family. For purposes of this policy, a potential conflict of interest occurs when an employee's outside interests (for example, financial or personal interests) interfere with Creospan's interests or the employee's work-related duties.

If you have a question about whether a situation is a potential conflict of interest, or if you become aware of any potential conflict of interest or ethical concern regarding your employment or another employee at Creospan, you must promptly speak to, write, or otherwise contact your Creospan supervisor or a Human Resources at hr@creospan.com. Creospan will investigate all concerns regarding conflicts of interest and will determine whether a conflict of interest exists and what action should be taken to address the issue.

Acknowledgment Form

Please be advised that each employee is required to sign an acknowledgement that he or she has read and understands this Handbook will adhere to the Company's policies and procedures. For new hires, this generally is done following the employee's acceptance of employment with the Company and while he or she completes the required new-hire paperwork. Existing employees likewise are required to review this Handbook and sign the same acknowledgement for updates to the Handbook. The Acknowledgment Form is attached to the end of this Handbook. It is each employee's responsibility to take time to become familiar with the Handbook.

EMPLOYMENT STATUS

Nature of Employment

Each Creospan employee is an employee at will unless he or she is covered by a contrary written employment contract. At will employment means that either an employee or the Company may

choose to terminate the employment relationship at any time, with or without cause, and with or without advance notice. While the Company generally adheres to progressive discipline in cases of unsatisfactory conduct or performance, it is not bound or obligated to do so. In addition, the Company may need to alter an employee's hours, schedule or position at its own discretion, with or without cause.

The policies set forth in this Handbook or in any other Company documents, except a written employment contract (in which case, how and when a termination or resignation may occur will be covered by the terms of such employment contract), do not modify the at will nature of employment at Creospan and should not be interpreted to mean that termination will occur only for "just cause." This Handbook does not create an express or implied contract of employment for a definite and specific period of time between an employee and the Company, nor otherwise create express or implied legally enforceable contractual obligations on the part of the Company concerning any terms, conditions or privileges of employment. Except for a written employment contract, any documents or statements, written or oral, prior, current or future that conflict with the employment at will policy are void.

Types of Employees

Creospan has three types of employees: (1) full time, (2) part time and (3) temporary.

A *full time* employee is hired to work on a regular schedule of 40 hours per week, and occasionally more, providing Creospan operational duties. Employees under this classification receive a salary and are eligible for benefits.

A *part time* employee is one that works less than 40 hours per week and is generally paid on an hourly basis and not eligible for benefits unless required by law.

A *temporary* employee is an employee that works on a specific project, providing consulting duties and operational support to a client. Employees are generally not eligible for benefits and are paid hourly.

Employees will be classified as exempt or non-exempt as described in the Fair Labor Standards Act. Only non-exempt employees are entitled to receive overtime pay.

Restrictions Against Outside Employment

A career at the Company is demanding. Individuals in professional client service and practice support roles need to give full attention to the Company's business, and in accepting a professional position one agrees to give his or her best efforts to the business of the Company. No individual shall, except on behalf of the Company with all fees payable to the Company, provide consulting services for a fee or otherwise act in competition with the Company.

Employees owe a duty of loyalty to the Company. It is expressly understood that any attempt to develop business while employed by the Company on Company time or for which Company

resources are used is solely for the benefit of the Company, and if an employee leaves the Company prior to the Company obtaining the business, any business relation with the client or prospective client subsequently developed within a two-year period following the employee leaving the Company shall be deemed for the benefit of the Company. In the event the Company determines that a former employee used Company time or resources to develop business other than for the benefit of the Company, then in addition to any remedies it may have in law or equity, the Company may seek from the former employee an accounting to pay over to the Company all fees directly or indirectly received from such client or prospective client.

Professional activities such as teaching, writing, and speaking engagements are encouraged by the Company. Any compensated outside activity should be discussed in advance with the appropriate business area leader, and receive prior written approval. The extent to which an individual should participate in such activities may depend on his or her own stage of professional advancement. Time requirements must be taken into consideration to ensure that the activity will not unduly infringe on Company-related responsibilities. Incidental income from such activities may be retained by the individual when the activities are performed substantially outside regular working hours. However, when the activity involves the assistance of other Company personnel, or requires substantial time during regular office hours, the resulting income will be Company income.

This policy applies to all employees. To determine whether an external opportunity (whether paid or unpaid, and which would run concurrent to your Creospan Employment) adheres to the outside employment policy, please contact Human Resources at hr@creospan.com.

Anniversary Date

Unless otherwise agreed to in advance, the first day that an employee reports to work is the employee's official start date and corresponding anniversary date. When an employee ends employment with Creospan and is rehired, the rehire date becomes the new anniversary date.

Performance Reviews

Creospan will endeavor to provide performance reviews for each employee annually but nothing in this Handbook requires Creospan to do so. Creospan may also conduct periodic performance reviews.

The Company has discretion whether to review the employee's salary during a performance review. A positive performance review does not guarantee either an increase in compensation or continuing employment. Raises, if given, may be based on a number of factors, such as Creospan performance and profitability, department or group performance, and individual performance.

Hours of Work

The normal work week consists of forty (40) hours Sunday through Saturday, excluding any unpaid lunch period. Our normal office hours are Monday through Friday, 8:30 a.m. to 5:30 p.m.

Your office hours may vary depending on your job requirements, either for Creospan or a client, and you may be required to work any other hours and/or be on-call. Work schedules and days off are determined by the nature of the work to be performed.

Attendance/Tardiness

Attendance and punctuality are important to the efficient operation of any business. Good attendance and punctuality are essential components of solid employee performance and are measured by objective standards. Poor attendance and tardiness disrupt productivity and make it difficult to function effectively. Each employee shall be responsible for being present at the correct location, at the correct time each day. Since Creospan revenues are generated by billing our clients for your time, your attendance and punctuality have a direct impact on our business.

On occasion, employees may have reason to be absent from work. On these occasions, all employees are required to provide prior notice, if possible, to their Company supervisor and client contact. Notice must be made at least two hours before the employee's scheduled start time for the day for foreseeable absences. For any unforeseeable absences, such as medical emergencies, the employee must provide notice as soon as reasonably practicable. Employees should indicate the reason and probable duration of the absence.

Excessive absenteeism, any absence without notice, repeated tardiness, or leaving work early will result in disciplinary action up to and including termination, unless the absence is because of a reason covered under federal, state or local law. For absences related to a medical issue, including personal illness, a statement from your healthcare provider may be required before you will be permitted to return to work. If an employee is absent from work for three (3) consecutive days without notice, the Company may consider that the employee has voluntarily resigned his or her position or may terminate the employee.

Background Check

A background check, including, but not limited to, a drug test, may be performed on any employee, either pre-employment or at any time during employment with Creospan pursuant to applicable federal, state, or local laws.

BENEFIT PROGRAMS

Holidays

The Company's offices are closed on the following observed holidays:

- New Year's Day
- Memorial Day
- 4th of July
- Labor Day

- Thanksgiving Day
- Christmas Day

Full-time employees will be paid for these holidays. Temporary and part time employees are not paid for holidays.

When a scheduled holiday falls on a Sunday, it will be observed on the following Monday. When a scheduled holiday falls on a Saturday, it will be observed the preceding Friday. Holidays that occur during an employee's vacation will not be counted as a vacation day.

The above holiday closure list does not apply to temporary employees. Instead, temporary employees must work according to the holiday schedule of the client for whose project the employee is assigned. The temporary employee is responsible for determining the holidays in which the client's office is closed and notifying his or her Creospan supervisor of these days off.

Employees may not roll over unused holidays to the following year. The Company does not provide monetary payments to employees in lieu of holidays.

Client Furloughs

If you are a client-facing employee and the client observes additional holidays or has a furlough policy (for example, the week of July 4th is off), employees may use PTO (including advanced PTO hours, if approved, that have not yet accrued) during those days. If an employee is not eligible for PTO or does not have enough PTO days to cover the Furlough Holiday, leave will be unpaid.

Floating Holidays

Creospan provides benefit eligible employees to have 2 Floating Holidays each calendar year. New hires will accrue 2 days if hired prior to July 1. Those hired July 1 – December 31 will have 1 Floating Holiday available to use in the calendar year of hire date.

Floating Holidays can be used for time off and when not being paid for hours worked. Eligible employees may use 1 Floating Holiday between Jan - Jun and a 2nd Floating Holiday between Jul – Dec. If the employee has been at Creospan for the full calendar year, and still has 2 days of Floating Holidays in between Jul – Dec, the employee can use both by December 31.

Floating Holidays may only be used in full day increments (8 hours) and can be used for any reason. When entering Floating Holidays in your ADP Timecard, you will need the pay code "Float" to showcase that you are using a Floating Holiday.

An employee may not use Floating Holiday as their last day prior to separation from Creospan. An employee may not use Floating Holidays during their notice period.

Floating Holidays cannot be carried over from one calendar year to the next calendar year and balance at the end of the year will be forfeited.

Paid Time Off (PTO) (Employees Based Outside of Illinois)

All full-time employees are eligible for paid time off in accordance with an accrual schedule discussed below. Temporary and part-time employees are not eligible for PTO unless required by law. Employees may use PTO for vacation, illness, personal time, or any use required by state or local paid leave laws.

The maximum amount of PTO that an employee may carry over to the next year depends on the years of service of the employee, unless required by state or local paid leave laws:

- Up to three years of service employees can carry over no more than 20 hours of accrued, unused PTO.
- From three to five years employees can carry over no more than 24 hours of accrued, unused PTO.
- Five or more years of service employees can carry forward no more than 32 hours of accrued, unused PTO.

Employees may use any and all accrued and unused PTO that is carried over. All other unused PTO is forfeited at the end of the year.

As mentioned above, PTO is accrued throughout the year according to the below accrual schedule. Example: If a person has been with the Company since the beginning of the year, has not used any PTO, and wants to take time off in June, the PTO available will only be what has been accrued from January through June. If the person does not take any PTO at all during the year, the accumulated PTO at the end of the year would be the entire PTO allowed for the year and subject to carryover limits.

An employee wishing to take PTO must request the time off by providing reasonable advance notice, if possible, of the desired dates to his or her Creospan supervisor. The Creospan supervisor will then approve or deny the request based on coverage and client requirements if in a client facing role. When the employee is assigned to a client, the client contact must also agree in writing to the time off. Reasonable advance notice, for purposes of this policy, is at least 14 days for all uses of PTO, when possible. If advance notice is not possible then the employee must also provide notice to his supervisor and client contact as soon as reasonably possible.

Every effort will be made to accommodate the request, but requests may be declined due to workload, financial or other pertinent reasons, except if state or local law states otherwise.

The Company does not provide monetary payments to employees in lieu of PTO, unless required by law. If an employee's employment is terminated or the employee resigns from the Company, the employee will be entitled to receive his or her accrued but unused PTO in the employee's last pay check.

Borrowing of future PTO days is not allowed unless approved by the CEO.

If additional time off without pay is needed, employees must get pre-approval by contacting their Creospan supervisor.

When an employee is placed on the paid bench, defined as being in between client projects, all deferred and accrued PTO must be used prior to receiving any Company paid wages. Accrual of PTO will be paused while on the bench. Accrual of PTO will resume when the employee comes off bench and is placed on assignment to a client project.

When an employee goes into an unpaid status, they do not accrue PTO.

Temporary and part time employees are not eligible for this Company benefit. If time off is needed, it will be unpaid.

Depending on state requirements, there may be additional benefits for the employee for time off either through leave or disability benefits from the state. Refer to your state leave laws or contact Human Resources at hr@creospan.com if you have questions.

Accrual Schedule

PTO is accrued each pay period based on the following schedule.

- Full-time employees with up to three years of service with Creospan accrue at 3.077 hours of PTO per pay period.
- Full-time employees with three to five years of service with Creospan accrue 4.615 hours of PTO per pay period.
- Full-time employees with five or more years of service with Creospan accrue 6.154 hours per pay period.

Below is a chart that summarizes the above policy. If you have questions about this policy or your eligibility for PTO, you should contact your supervisor or Human Resources at hr@creospan.com.

Months of Service	0-36	37-60	61+
Hours of PTO accrued for each bi weekly pay period	3.077	4.615	6.154
Annual accrual in hours	80	120	160
Annual accrual in days	10	15	20
Maximum unused PTO hours which an employee may carryover into the next year	20	24	32

When PTO May Be Taken

When scheduling time offs, the needs of the employee, the client, and the business unit or work team must be considered. The Company will try to accommodate an employee's time off plans; however, overriding client or business unit needs may necessitate employee flexibility.

PTO should be accrued before it is taken. If there is no accrued PTO and time off is taken, the associated time will be unpaid. If an employee terminates from Creospan, and he or she has a negative PTO balance, then the amount of any negative PTO balance will be deducted from final pay, to the extent permitted by law.

An employee may not use vacation/PTO as their last day prior to separation from Creospan. An employee may not use PTO during their notice period. We require and encourage the use of PTO time in-between client projects.

PLAWA Leave for Illinois Non-Exempt (Hourly) Employees

Pursuant to the Illinois Paid Leave for All Workers Act ("PLAWA"), non-exempt (hourly) employees are eligible to accrue PLAWA leave in proportion to the number of hours they are regularly scheduled to work, calculated at the rate of one hour accrued for every 40 hours worked.

Employees may not accrue PLAWA leave during unpaid leaves of absence or other periods of inactive service, unless accrual is required by applicable federal, state, or local law.

Eligible employees may accrue up to a maximum of forty (40) hours of PLAWA leave per year. Up to 40 hours of accrued and unused PLAWA leave will carry over to the next year. Employees cannot use more than 40 hours of PLAWA leave in any given year. Employees are eligible to begin taking PLAWA leave on their 90th day of employment.

Employees can take leave for any reason. Documentation, like a doctor's note, is not required. Creospan requires advance notice prior to taking paid leave, to the extent that leave is foreseeable. Creospan may deny an employee's request for paid leave due to operational necessity. PLAWA leave must be taken in increments of no less than two hours.

An employee may not use PLAWA Leave as their last day prior to separation from Creospan. An employee may not use PLAWA Leave during their notice period.

Accrued, unused PLAWA leave will not be paid out to hourly employees upon termination of employment.

PLAWA and PTO Leave for Illinois Salaried Employees

PLAWA Leave

Pursuant to the Illinois Paid Leave for All Workers Act (“PLAWA”), exempt (salaried) employees are eligible to accrue PLAWA leave in proportion to the number of hours they are regularly scheduled to work, calculated at the rate of one hour accrued for every 40 hours worked (or one hour for every week worked).

Employees may not accrue PLAWA leave during unpaid leaves of absence or other periods of inactive service, unless accrual is required by applicable federal, state, or local law.

Eligible employees may accrue up to a maximum of forty (40) hours of PLAWA leave per year. Up to 40 hours of accrued and unused PLAWA leave will carry over to the next year. Employees cannot use more than 40 hours of PLAWA leave in any given year. Employees are eligible to begin taking PLAWA leave on their 90th day of employment.

Employees can take leave for any reason. Documentation, like a doctor’s note, is not required. Creospan requires seven days’ advance notice prior to taking paid leave, to the extent that leave is foreseeable. Creospan may deny an employee’s request for paid leave due to operational necessity. PLAWA leave must be taken in increments of no less than two hours.

Accrued, unused PLAWA leave will not be paid out to exempt employees upon termination of employment.

An employee may not use PLAWA Leave as their last day prior to separation from Creospan. An employee may not use PLAWA Leave during their notice period.

PTO Leave for Exempt (Salaried) Employees

The PTO Policy set forth above applies to all Illinois-based Exempt (Salaried) employees, except the accrual rate is as set forth below:

Months of Service	0-36	37-60	61+
Hours of PTO accrued for each bi weekly pay period	1.5385	3.9766	4.6155
Annual accrual in hours	40	80	120
Annual accrual in days	5	10	15
Maximum unused PTO hours which an employee may carryover into the next year	20	24	32

Health Insurance

All full time employees are eligible to apply and receive health insurance coverage through Creospan's insurance carrier, in accordance with the terms and conditions of the policies and plans currently in effect. Creospan is under no obligation to pay, on your behalf, the premiums for the group insurance coverage. Creospan, in its sole and absolute discretion, shall determine what portion of, if any, of group insurance premiums will be the responsibility of the employees.

Any health insurance or other benefits offered by Creospan may be modified or eliminated by Creospan at any time, in its sole and absolute discretion.

Currently Creospan offers medical, dental, vision, life, AD&D and LTD group coverages. In addition, Creospan provides voluntary accident, voluntary critical illness and voluntary hospital indemnity coverages. For detailed plan descriptions and other details Creospan has created a Benefit Guide for employees and can be obtained by contacting Human Resources. Eligible employees may sign up for coverage at the time they are hired, and if elected, coverage will begin the first of the month following 30 days of employment. Employees may also sign up or change their elections during open enrollment currently occurring in March of every year for an April 1st effective date. There is also the ability to enroll or change coverages during special enrollment periods when an employee experiences a change of status event such as the birth of a child, marriage, gain or loss of spouse's coverage and other life events. Employees can contact Human Resources about the need to add or change group insurance coverages.

If there is determined to be a shared cost for any group insurance coverage, the employee is responsible for paying their share of the cost of elected insurance coverages through payroll deductions. While in a leave status the employee is still required to pay for their share of elected group insurance coverage. If paid time off is used, the employee's share of coverage may be made through paid PTO, if available and used.

When an employee is on leave and is in an unpaid status, the employee needs to coordinate with Human Resources on paying or repaying their portion of the insurance that has not been paid through payroll deductions. Should an employee move to an unpaid status, and when benefits are not required to remain the same as if employed, for example Family Medical Leave, then the employee is required to pay the entire cost of elected insurance coverages (both employee and employer share) after two weeks of unpaid status. It is the employee's responsibility to work with Human Resources on payment or repayment of the cost of insurance.

All insurance coverage ends at date of termination. Coverage for medical, dental and vision may be continued under COBRA through a third party who provides notice to the termed employee.

If an employee has insurance coverage separates from the Company, and is rehired, they will be eligible for insurance coverage on their date of rehire if they are eligible for benefits.

401(k) Plan

Creospan offers a 401(k) retirement savings plan which employee can make pretax contributions to

through payroll deductions. Employees will be provided with the opportunity to select, monitor and adjust investment options should they elect to participate in the plan. This plan is regulated by the US Department of Labor and Creospan adheres to the 401(k) regulations.

Full-time employees may participate in the Company's 401(k) plan, subject to the terms of the plan and rules in effect and as amended from time to time. For plan documents and additional information about the Creospan 401(k) Plan contact Human Resources. Plan documents detail eligibility requirements, contributions to the plan, and withdrawals from the plan.

If eligible, employees may enroll in the 401(k) plan after 6 months of employment.

LEAVE OF ABSENCE & MANDATED BENEFITS

Bereavement Leave

Full-time employees will be granted up to three days of paid leave in the event of the death of a spouse, child, parent, sibling or comparable step relation. The Company will grant one day of paid leave in the event of the death of a grandparent, father-in-law, mother-in-law, son-in-law, or daughter-in-law.

Jury Duty

Full-time employees will be provided one day of paid leave and additional unpaid leave for jury duty. Accrued PTO may be used for jury duty. Temporary and part time employees will only be provided unpaid time off for jury duty in compliance with state and federal law. All employees are required to notify their client contact and Creospan supervisor of their anticipated absence as soon as possible. Documentation may be requested to support time off for jury duty. If an employee is released from jury duty early, he or she is expected to return to work as soon as possible.

Voting

It is the policy of the Company to permit employees to be absent from work to vote in local, state or national elections. Employees who cannot reach their polling place outside of work hours will be permitted to use accrued PTO to vote. Employees not eligible for PTO will be unpaid for time off to vote. Time off to vote may not exceed two (2) hours.

Parental Leave of Absence

Full-time employees are eligible for three days of paid leave from work for the birth of an employee's child or certified adoption of a child. This is in addition to any PTO or unpaid leave that the employee chooses to take under the Family MLA. The employee will be paid at their regular salary for the three-day paid absence. If you plan to take parental leave, you must notify your supervisor in writing at least 30 days prior to leave. You must also notify your client contact.

Family and Medical Leave Act (FMLA)

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. Accrued PTO may also be used to cover a portion of Family Medical Leave (FML). FML may be used 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 one 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 service member'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 PTO while taking FMLA leave. If an employee substitutes accrued PTO for FML, the employee must comply with the employer's PTO policies.

Benefits & Protections

While employees are on FMLA leave, employers must continue health insurance coverage as if the employees were not on leave, and the employee is still responsible to pay their portion of insurance coverage for any unpaid leave.

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

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

Eligibility Requirements

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

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

Requesting Leave

Generally, employees must give 30-days' advance notice, if possible, of the need for FML. 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 may be required to obtain a medical certification for use of FML. 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 FML 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 FML 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.

Creospan will notify its employees if leave will be designated as FML, and if so, how much leave will be designated as FML.

Enforcement

If an employee feels that FML was not administered correctly, the employee should first communicate with hr@creospan.com, and if not satisfied, the employee may file a complaint with the U.S. Department of Labor, Wage and Hour Division.

The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law that provides greater family or medical leave rights. If you are ineligible for the federal FMLA, you must contact hr@creospan.com to determine if you are eligible for leave under state or local law.

Military Leave of Absence

Any employee who is called to military service, training or reserve duty will be granted accrued

PTO, when eligible, and/or unpaid military leave of absence. Creospan requires employees seeking military leave to submit advanced notice for the leave unless military necessity prevents it or the giving of advance notice is not possible.

Proof of the need for military service may be required. Employees on military leave for thirty (30) days or less may retain group insurance coverage at the same cost and terms as prior to the leave. If military leave is extended for more than thirty (30) days, employees may transition to a military health care plan or elect to continue employer-sponsored insurance coverage for up to twenty-four (24) months. The employee may be required to pay for up to 102% of the full premium of such coverage.

Employees returning from military service will be reemployed in the job that they would have attained had they not been absent for military service, if qualified to perform that job, and entitled to the seniority, status, and pay, as well as other rights and benefits determined by seniority that the person would have attained if the person had remained continuously employed. Employees returning from military service are also entitled to other rights and benefits not determined by seniority as are generally provided by the Company to employees with similar status who are on leave of absence for other reasons. Reasonable efforts will be made to enable returning employees to refresh or upgrade their skills in order to qualify for reemployment.

The period an individual has to report back to work after military service is based on time spent on military duty. For military service of less than thirty-one (31) days, the service member must return at the beginning of the next regularly scheduled work period on the first full day after release from service taking into account travel home and an eight-hour rest period. For military service of more than thirty (30) days but less than 181 days, the service member must submit an application for reemployment within fourteen (14) days of release from service. For military service of more than 180 days, an application for reemployment must be submitted within ninety (90) days of release from service. The maximum absence that will allow a service member to retain reemployment rights is five (5) years.

The Company's military leave of absence policy is in accordance with, and subject to the Uniformed Service Employment and Reemployment Rights Act, and other applicable laws and regulations.

Workers Compensation

To provide for payment of employee medical expenses and for partial salary continuation in the event of work-related accident or illness, all employees are covered by workers' compensation insurance provided by Creospan, based on state regulations. The amount of benefits payable and the duration of payment depend upon the nature of the employee's injury or illness. All medical expenses incurred in connection with an on-the-job injury or illness and partial salary payments are paid in accordance with applicable state law through the workers' compensation carrier or state of residence.

If an employee is injured or becomes ill on the job and believes it to be work related, the employee

must immediately report such injury or illness to their supervisor or Human Resources at hr@creospan.com. You should also report any “near misses” which is any unsafe situation that likely would have caused injury if not for some intervention or chance. Reporting injury, illness, and near misses ensures that the Company can help obtain appropriate medical treatment and correct unsafe work conditions. An employee’s failure to follow this procedure may result in the appropriate workers' compensation report not being filed timely in accordance with the law, which may delay benefits in connection with the injury or illness. Questions regarding workers' compensation insurance should be directed to Human Resources at hr@creospan.com.

Medical Restrictions

Each employee is responsible for notifying and providing medical verification to Creospan for any restrictions placed on his or her normal job duties due to illness, physical or mental condition. Creospan will cooperate with the employee and his or her health care provider in accordance with applicable state compensation regulations, the Americans with Disabilities Act, and other standards provided by law. Employees must follow the job restrictions placed by a health care provider in order to prevent further injury.

PAYROLL CYCLE & PROCESSING

Creospan is committed to complying with the Fair Labor Standards Act (FLSA) and all other similar state and local wage laws. It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable laws. Improper deductions from employees’ salaries are prohibited. If you are classified as a non-exempt employee, you must record correctly all work time and review your paychecks promptly to identify any errors. You must report all errors to Human Resources. If you are classified as an exempt salaried employee, you will receive a salary which is intended to compensate you for all hours that you may work for the Company. This salary will be established at the time of hire or when you become classified as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions, unless mandated, or otherwise allowed by law.

Creospan is mandated by law to make certain deductions from an employee’s paycheck. These deductions include, but are not limited to, federal income taxes, state and local income taxes as well as FICA taxes (Social Security and Medicare).

Some employees may also have additional court mandated deductions, such as child support payments, student loan payments, wage attachments or IRS tax levies. Moreover, absent contrary state law requirements, your salary can be reduced for reasons such as full day absences for personal reasons, if PTO is not available, Family and Medical Leave absences, or health insurance premiums.

If an employee—whether classified as “exempt” under the FLSA or “non-exempt”—discovers a problem with his or her classification, a deduction made on a paycheck, or the accuracy of a

paycheck, he or she must immediately report that problem to Human Resources at hr@creospan.com. An investigation will be immediately conducted, and the Company will correct any errors or problems.

Creospan prohibits retaliation for any complaints, disputes, or cooperation in investigations regarding paychecks, timecards, amount of time worked, overtime pay, or any other pay related issues. If you feel that you have been retaliated against for a lawful complaint, protest, or cooperation with an investigation, you should immediately contact Human Resources at hr@creospan.com or a member of management.

Lunch & Break Periods

We encourage all employees to take lunch and breaks during their work day. Temporary and part time employees may take up to a thirty (30) minute unpaid lunch break per day. No work is permitted during this lunch break. Full Time employees paid on a bi-weekly basis are permitted to take a 60 minute lunch period during their work day. Employees are also allowed a reasonable amount, as determined by Creospan, of short breaks (no more than ten (10) minutes each two times per shift) at their discretion, and as their workload permits. Employees found taking an unreasonable amount of breaks or breaks for an unreasonable amount of time, whether those breaks are for smoking, personal phone calls, walks, etc., may be disciplined up to, and including, termination.

Overtime

Non-exempt employees under the Fair Labor Standards Act are eligible for overtime pay for all hours in excess of forty (40) worked in any work week. The Company will make an effort to provide advanced notice to non-exempt employees when overtime will be mandated. Only overtime designated by a supervisor in writing is approved overtime. If an employee works overtime without approval by a supervisor, the overtime must be paid; however, the employee may be subject to disciplinary action. Overtime is paid at the rate of one-and-one-half times the employee's regular hourly rate of pay. Exempt employees do not receive overtime pay

Time Cards

State and federal law requires accurate recording of time worked by all non-exempt employees. An employee's recorded time is a legal record of the hours worked and his or her paycheck is based on the time record. Employees are responsible for ensuring that accurate time records are contemporaneously prepared and are timely submitted.

Temporary employees must complete and submit on time a timecard in the client approved system, where required, and have it approved by their supervisor and reviewed by a client contact. If timesheets are not submitted on time, the employee's compensation for that period may be delayed.

Salaried employees who are at a client location must timely submit timecards in the client approved

system, where required, to avoid any client specific mandate that governs our contractual agreements with them. Failure to timely submit a timecard impacts Creospan's billing process, and therefore, any employee that does not timely submit a timecard is subject to discipline, including termination.

No supervisor or employee has authorization to require that you inaccurately record the amount of time that you worked. If a supervisor or employee demands such conduct, or you feel that your time was somehow otherwise recorded improperly, whether by a Creospan employee or a client, you must immediately contact Human Resources at hr@creospan.com. An investigation will be conducted after receiving your complaint. Creospan will make every effort to keep your complaint and any information that you provide confidential to the best of our ability but may need to reveal such information if necessary.

Pay Periods

All employees will be paid bi-weekly. For paydays falling on a holiday, you will be paid the following business day. Questions regarding paychecks should be directed to Human Resources at hr@creospan.com.

All employees will receive their compensation, expense reimbursements, referral bonuses, etc. by means of direct deposit to their personal bank accounts. The first paycheck for a new hire may be in paper form and mailed to the address on file.

If your employment is terminated, you will be issued your final paycheck in accordance with applicable law. Creospan will make all legally permissible deductions—such as those authorized by law or with express written consent of the employee at that time—before issuing the employee's final paycheck.

Direct Deposit

For your convenience Creospan offers direct deposit through our payroll vendor, currently ADP, into financial institution(s) and account(s) of your choice and as you set up directly with ADP. Employees may set up direct deposit by entering information into ADP such as type of account, bank routing number, bank account number(s) and net check or specific amount(s) to be deposited.

When signing up for direct deposit with ADP, you are authorizing Creospan and ADP to deposit pay to the accounts you have set up. To the extent permitted by law, you also authorize Creospan and ADP to debit the account any funds which are deposited in error. You may make changes to your direct deposit selections at any time with the understanding that it may take a full pay period for the change to take effect.

If you do not choose to use direct deposit a check for your net pay will be mailed to you.

Error in Pay

If an employee believes that there is an error in his or her payroll rate, calculation methods, or any other aspect of benefits, he or she must bring this concern to the attention of the Human Resources at hr@creospan.com immediately. Waiting will make it more difficult to address the issues.

Retaliation for reporting errors in pay or making a complaint about your pay is prohibited. If you feel that you have been retaliated against for making a lawful complaint about errors in your pay, you should immediately report such conduct to Creospan's Human Resources at hr@creospan.com.

Expense Reimbursement

Employees may occasionally be required to incur travel and other business expenses in the course of conducting Creospan business. Creospan will reimburse employees for all usual and reasonable business expenses. All expenses must be approved in advance and in writing by your supervisor.

If an employee must use his or her personal vehicle to conduct Company business, he or she will be reimbursed at the most recent rate allowed by the IRS. Creospan does not reimburse employees for their commute to and from their regular place of business. Business lunches and dinners with other Company employees will not be reimbursed unless for documented business purposes approved in advance by your supervisor. Employees are expected to limit expenses to reasonable amounts.

Employees applying for reimbursement of business expenses must timely—no later than 30 days after the expense was incurred—submit expense reports and receipts to accounting at billing@creospan.com.

Abuse of this business expenses policy, including falsifying expense reports to reflect costs not incurred by the employee, is grounds for disciplinary action, up to and including termination.

EMPLOYEE DISCIPLINE & TERMINATION

Progressive Discipline and Examples of Inappropriate Behavior

As a Company team member, employees are expected to accept certain responsibilities, follow acceptable business principles in matters of conduct, and exhibit a high degree of integrity at all times. This not only involves sincere respect for the rights and feelings of others, but also demands that employees refrain from any behavior that might be harmful to themselves, co-workers, the Company, or that might be viewed unfavorably by current or potential customers or by the public at large. Employee conduct reflects on the Company. Employees are, consequently, encouraged to observe the highest standards of professionalism at all times.

Should an employee's performance, work habits, overall attitude, conduct or demeanor become

unsatisfactory based on violations of any Company policies, rules or regulations, the employee will be subject to disciplinary action, up to and including termination. The Company generally follows a progressive discipline policy which administers equitable and consistent discipline for unsatisfactory conduct in the workplace. The major purpose of any disciplinary action is to correct the problem, prevent recurrence and prepare the employee for satisfactory service in the future.

Although employment with Creospan is based on mutual consent and both the employee and the Company have the right to terminate employment at will, with or without cause or advance notice, Creospan may use, at its discretion, the following progressive discipline steps:

- **Verbal Counseling** - A "verbal counseling" is a verbal communication to an employee that his/her conduct is unacceptable, and that repeated or continued failure to conform conduct or performance to the Company standards will result in more severe disciplinary action. A record of the notice of the verbal counseling may be made, provided to the employee and retained in the employee's personnel file.
- **Written Counseling** - A "written counseling" describes the unacceptable conduct or performance of the employee and specifies needed changes or improvements. A copy of the written counseling generally will be provided to the employee for comment and retained in the employee's personnel file.
- **Suspension** - Suspension of the employee's employment may, at the sole discretion of the Company, be used prior to termination. The length of the suspension will vary based upon such factors as the severity of the offense, the employee's performance and the employee's disciplinary record. An employee may be suspended for repeated instances of minor misconduct, failure to conform his/her conduct or performance to the standards of his/her position, or for a single serious offense. The suspension may be unpaid at the discretion of the company. A record of the suspension will be provided to the employee for comment and retained in the employee's personnel file.
- **Termination** - If an employee fails to conform his/her conduct or performance to the standards required by the Company, the Company may, in its sole discretion, terminate the employee's employment. The termination will be verified with a written separation letter provided by Human Resources.

Progressive discipline means that, with respect to most problems, the above steps will generally be followed. There may be circumstances, however, when one or more steps are bypassed in the discretion of the company depending on the severity of the problem and the number prior of occurrences. Certain types of employee problems are serious enough to warrant either a suspension or termination of employment without following the usual progressive discipline steps. While it is impossible to list every type of behavior that may be deemed a serious offense, this Handbook includes the below examples of problems that may result in discipline, suspension or termination of employment. By using progressive discipline, most employee problems can be corrected at an early stage, which is to the benefit of both the employee and the Company.

Below are examples of behavior and conduct that the Company considers inappropriate which include, but are not limited to the following:

- Falsifying employment or other Company records.
- Violating the Company's Anti-Harassment Policy.
- Violating state, federal or local laws and regulations.
- Violating security or safety rules or failing to observe safety rules or the Company safety practices; failing to wear required safety equipment; or tampering with the Company's equipment or safety equipment.
- Soliciting gratuities from customers or clients.
- Exhibiting excessive or unexcused absenteeism or tardiness.
- Providing—whether intentionally or not—confidential or proprietary Company or client information to competitors or other organizations without the proper Company approval or in violation of the Company's confidentiality or other policies.
- Possessing firearms, weapons or explosives on Company property and in violation of Company policy.
- Destruction, theft, or unauthorized use of Company property—including, but not limited to, computers, internet, Creospan's or its clients' data, confidential information, email, and assets.

Employee Resignation

Resignation is a voluntary act initiated by an employee to terminate employment with the Company. Creospan requests at least two week written notice of resignation from all employees.

An employee's final paycheck will include any accrued but unused PTO hours the employee had as of the final day of employment. All Company or client issued equipment in the employee's possession must be returned to the Company or client as directed as of the end of the employee's employment. If permitted by law, an employee's final pay may be withheld pending the return of company or client issued equipment.

Employee Termination

As an at-will employee, Creospan may terminate an employee's employment at any time and for any reason or for no reason at all, with or without notice regardless of the employee's work performance or compliance with the rules set forth in this Handbook. All Company equipment in the possession of a dismissed employee must be returned to the Company at the time employment ends. If an employee fails to return the Company's equipment or material upon termination, if permitted by law, the employee's final pay may be withheld until all company property is returned. In addition, Creospan may seek legal relief against the employee, and his or her future employer, if applicable, to enjoin the employee from further causing Creospan harm and to recover damages and attorney's fees based upon the employee's unlawful conduct of retaining company property after employment end.

Exit Interviews

Exit interviews provide the Company with information regarding a person's employment and work life with the Company. Upon voluntary or involuntary termination of employment, with or without cause, the Company may choose to conduct an exit interview with the departing employee. Exit interviews will be confidential as much as possible and will be conducted by a member of Human Resources.

HUMAN RESOURCES RULES & POLICIES

Confidentiality & Non-Disclosure

As the result of employment with Creospan, employees have access to confidential information regarding the business of the Company and its clients. Confidential Information is defined in this Handbook as all non-public information of the Company, its clients, vendors and customers, including but not limited to: research, design, code, data, development, strategies, production, and presentation, costs, expenses, margins and budgets; information and materials used in marketing or presenting the business, including style, format and content; customer and potential customer lists, and information pertaining to customer goals and strategies; prices and terms offered or paid for products and services to suppliers and contractors.

Confidential Information also includes lists, contacts, prices, specifications and other information, techniques, procedures, processes, formulas, equipment, methods, technical data, know-how and compilations of the business; business proposal and plans and financial and operational information and strategies, the Company's members and each of their affiliates' financial and capital structure, creditors, debtors and financial data; any material or information of whatever nature which provides the Company, its affiliates, or its and their customers an opportunity to gain an advantage over competitors, and any and all other trade secrets or proprietary and confidential information or materials of the Company, its affiliates and/or its and their customers.

As a condition of employment, each employee must agree by signing an agreement and signing acknowledgement of receipt of this handbook, that all such information is the exclusive property of Creospan or the client, and that he or she will keep confidential and not disclose to anyone, except as authorized and required by the responsible exercise of the employee's job duties, any such information whether or not it has been designated specifically as "confidential." This is true regardless of whether an employee is actively employed, on leave or if employment with the Company ends (for any reason). Employees who disclose such Confidential Information will be disciplined, up to and including immediate termination and may be subject to legal action.

If an employee is ever unsure of his or her obligations under this confidentiality and non-disclosure policy, it is the employee's responsibility to consult with a Creospan supervisor or Human Resources. Employees should be aware that the Defend Trade Secrets Act of 2016 provides immunity from civil and criminal liability under state and federal trade secret laws for any employee who discloses a trade secret in a lawsuit or other proceeding filed under seal or who discloses a trade secret in confidence to a government official or an attorney for the sole purpose of reporting or investigating

a suspected violation of law.

Non-Disparagement

Employees agree that, during the term of employment and at all times thereafter, they will not make or publish any false, disparaging, critical, or derogatory statements, whether written or oral, regarding the Company, its affiliates, clients, employees, officers, directors, products, or services. This includes comments made publicly, on social media, or to any third party that could damage the Company's reputation or goodwill.

Nothing herein is a restriction from making truthful statements about unlawful acts in the workplace, such as harassment or discrimination or from responding to a court order, subpoena, or legal process, including inquiry from a government agency which cannot be subject to a non-disparagement covenant.

Electronic Storage and Communications Policy

Creospan has established this Electronic Storage and Communications Policy in an effort to make certain that employees utilize electronic communications devices in a legal, ethical, and appropriate manner. This policy is in addition to any other computer, internet, IT or information security policies (for example, Creospan's Information Security Program and Policy) that the Company has provided you. This policy extends, by way of example only, to all features of the company or client's electronic communications systems, including computers, e-mail, connections to the internet and other internal or external networks, voice mail, texts, social media, video conferencing, facsimiles, and telephones. Any other form of electronic communication used by employees currently or in the future is also intended to be encompassed under this policy.

It is not possible to identify every standard and rule applicable to the use of electronic communication devices. Employees are therefore encouraged to utilize sound judgment whenever using any feature of the communications systems. In order to offer employees some guidance, the following are examples of such inappropriate activities:

- Transmit, access, or download offensive, fraudulent, or defamatory images or text, such as pornography or off-color jokes, or anything that may be construed as illegally harassing or offensive to others regardless of whether information is fact or just employee opinion. This would also be covered under the Creospan Harassment Policies.
- Transmit or download copyrighted images, games, or text belonging to third parties without the copyright-holder's permission.
- Transmit Creospan or client information to third parties without the express permission of Creospan or the client, as appropriate.
- Download or open any file received from any source outside Creospan or client without first scanning the same for viruses using an approved virus-checking program.
- Using electronic communication devices for a commercial use that is not, according to

Creospan or the client, for the direct and immediate benefit to Creospan or the client.

- Using electronic communication devices for any purpose that is competitive, either directly or indirectly, to the interests of Creospan or client or for any purpose that creates an actual, potential or apparent conflict of interest with Creospan or client.

Employees should not maintain any expectation of privacy with respect to information transmitted over, received by, or stored in any electronic communications device owned, leased or operated by or on behalf of Creospan or its client. Creospan and its clients retain the right to gain access to any information received by, transmitted by, or stored in any such electronic communications device, at any time with or without an employee's knowledge, consent or approval.

Employees who violate any aspect of this policy or who demonstrate poor judgment in the manner in which they use electronic communications devices will be subject to disciplinary action, up to and including the possibility of immediate termination. This policy includes Creospan locations and client locations at which any employee may be working.

Internet Use Code of Conduct

Internet access is provided by Creospan to assist employees in obtaining work-related data and complete work-related projects. Incidental and brief personal internet use is permitted within reasonable limits.

Abuse of the internet access provided by Creospan in violation of law or Creospan policies will result in disciplinary action, up to and including termination. Employees may also be held personally liable for any violations of this policy. The following behaviors are examples of previously stated or additional actions and activities that are prohibited and can result in disciplinary action:

- Violating copyright law.
- Failing to observe licensing agreements.
- Sending anonymous e-mail messages.
- Sending or posting discriminatory, harassing, or threatening communications.
- Using the Company's time and resources for personal gain.
- Stealing, using, or disclosing someone else's code or password without authorization.
- Participating in the viewing or exchange of pornography or obscene materials.
- Attempting to break into the computer system of another organization or person.
- Refusing to cooperate with a security investigation.
- Jeopardizing the security of the Company's electronic communications systems.
- Sending or posting confidential material, trade secrets, or proprietary information outside of the Company.
- Engaging in unauthorized transactions that may incur a cost to the organization or initiate unwanted internet services and transmissions.

Social Media Policy

Creospan encourages employees to share information with co-workers and with those outside the company to gather information, generate new ideas, and learn from the work of others. Social media provides unique ways to participate in an exchange of ideas and information. But information posted on a website or application is available to the public and can thus affect the reputation and goodwill of Creospan. You are personally responsible for what you communicate in social media. Thus, Creospan has established the following guidelines for employee participation in social media.

“Social Media,” as used in this policy, means communication media that allows the user to broadcast user generated content to other persons having access to the same media. Social media takes many different forms, including Internet forums, message boards, blogs, wikis, podcasts, wall-postings, e-mail, instant messaging, music-sharing, group creation, and voice over IP. Examples of social media applications are Twitter, Facebook, YouTube, Instagram, and LinkedIn.

- *Off-duty use of social media.* Employees may maintain personal websites, social media profiles, or weblogs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work and does not violate this Handbook. In general, the company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas. But employees must make it clear in your social media activity that you are speaking on your own behalf. When you disclose your affiliation as an employee of Creospan you must also include a disclaimer that your views do not represent those of your employer. If your post would violate any of Creospan’s policies in another forum, it will also violate them in an online or social media forum.
- *On-duty use of social media.* Employees may engage in social media activity during work time provided it is directly related to their work, approved by their supervisor, and does not identify or reference company clients, customers, or vendors without express permission. The company monitors employee use of company computers and the Internet, including employee blogging and social networking activity.

Employees shall not use social media—whether on duty or off duty—for communication connected with Creospan business or to the workplace in a manner that is harassing, intentionally defamatory, bullying, or that discriminates on the basis of sex, religion, race, color, age, disability, national origin, sexual orientation or any other basis prohibited by law or this Handbook. Additionally, users shall not violate or misappropriate the intellectual property rights of the Company or disclose confidential information and trade secrets, such as information regarding sales strategies and data, client and vendor relationships, product and service launch information, the development of systems, processes, products, know-how and technology, internal reports, policies, procedures and other information that is of a competitive nature or that derives value by being maintained as confidential.

All contents of Creospan’s technology resources and communications systems are the property of Creospan. Therefore, employees should have no expectation of privacy whatsoever in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed

from, or stored or recorded on Creospan's electronic information and communications systems.

Please note, however, that this Social Media Policy will not be enforced so as to interfere with or restrict an employee's legal rights, including rights under the National Labor Relations Act, or to proscribe or prohibit any lawfully protected employee communications.

In Office Artificial Intelligence Policy

Introduction

Creospan is vigilant about monitoring the evolution of technology. Artificial Intelligence ("AI") is a current industry disruptor. It is necessary to implement a structured approach to control its use in the workplace that safeguards proprietary and confidential information as well as considers legal, governance, and ethical issues.

The nature of some AI models is to learn from new examples, there is potential for these models to learn confidential or proprietary information during interaction with users and disclose that information to outside parties.

Purpose and Scope

This Policy outlines the unauthorized use and implementation of AI and machine learning in work-related activities. The standards contained herein apply to all Creospan employees and subcontractors ("Creospan Personnel") who do not work directly on client projects including but not limited to Creospan Personnel in the following departments: Administrative, Accounting, Human Resources, Account Management, Sales, Marketing, IT, Recruiting, Legal, and Management at all levels.

Unauthorized Use of AI

Unless authorized in writing by a Creospan IT Security Manager, Creospan Personnel shall be prohibited from removing Creospan property, including but not limited to Personally Identifiable Information, Books & Records, IP, trade secrets, or digital company assets (i.e., data, cyber security) from the internal environment and uploading that property (i.e., data, code, business process information) into a Chatbot or any type of tool that is powered by AI.

The following list of Rule Based and AI-Powered Chatbots is not intended to be all inclusive but is a sample of the **prohibited Chatbots** and similar tools that are currently freely available and is intended to include all similar technologies:

- ChatGPT: OpenAI GPT-3 and up
- Microsoft DialoGPT
- Google Chatbase
- IBM Watson
- Facebook Wit.ai
- Rasa

- Amazon Lex
- Google BERT
- Salesforce Einstein

Enforcement

All AI Policy restrictions must be enforced by Creospan management and personnel. Deviation from the policy terms shall require appropriate documentation and remediation. Consequences for non-compliance must be administered in accordance with the current Creospan Human Resources Policy which may include termination of employment.

Equal Employment Opportunity (EEO)

Creospan provides equal employment opportunity to all employees and applicants for employment, without regard to race, creed, color, religion, sex, sexual orientation, gender identification, national origin, citizenship, documented status, age, veteran status, disability, marital or pregnancy status, and any other classification protected by law. This policy relates to all employment decisions, including those in connection with recruitment, hiring, training, promotion, compensation, benefits, termination and all other terms and conditions of employment. Our policies are in accordance with all federal, state and local equal employment opportunity rules, ordinances, executive orders and related laws.

If an employee has a problem or complaint related to this EEO policy, he or she is required to contact the Human Resources department at hr@creospan.com. Retaliation for making a complaint or cooperating in an investigation about issues related to this policy is prohibited. If you feel that an employee of Creospan or a client has retaliated against you in violation of this policy, please immediately contact Human Resources at hr@creospan.com.

Harassment, Discrimination, & Violence-Free Workplace

It is the policy of the Company to maintain a working environment that encourages mutual respect and promotes respectful and congenial relationships between employees and that is free from all forms of harassment by anyone, including supervisors, co-workers, clients, vendors, contractors or customers. Harassment, even when not unlawful or directed at a protected category, is expressly prohibited and will not be tolerated by the Company. Accordingly, Company management is committed to vigorously addressing complaints of harassment, sexual harassment, violence and threats of violence, and discrimination at all levels within the Company.

Reporting Harassment, Discrimination, and Violence or Threats of Violence

We encourage the reporting of all incidents of harassment, discrimination, or violence—whether by Creospan personnel or a client. We recognize that power and status disparities may make a confrontation difficult. Any employee who feels that his or her rights have been violated under this

policy should inform their direct supervisor immediately. If an employee is uncomfortable reporting to their direct supervisor, reports should be made directly to Human Resources at hr@creospan.com.

Employees may raise concerns and make reports without fear of reprisal. All reports will be put in writing and investigated promptly and thoroughly. All investigations into complaints about harassment, discrimination, or violence will be kept confidential to the extent reasonably practicable. Creospan will not retaliate against an individual who makes a good faith report of harassment or provides information concerning an incident, nor will it permit any employee to do so. Retaliation is a serious violation of this policy and should be reported to the Human Resources department at hr@creospan.com or any member of management. Any person found to have retaliated against another individual for reporting harassment will be subject to disciplinary action, up to and including termination.

Defining Harassment, Violence, and Threats

Sexual Harassment: For purposes of this policy, sexual harassment occurs when an employee makes unwanted sexual advances, requests for sexual favors and other verbal, visual, or physical conduct of a sexual nature to another employee when: (1) submission to or rejection of this conduct by an individual is used explicitly or implicitly as a factor in decisions affecting hiring, evaluation, promotion or other aspects of employment; (2) this conduct substantially interferes with an individual's employment; or (3) creates an intimidating, hostile, or offensive work environment.

All Other Forms of Harassment: For purposes of this policy, all other forms of harassment include all inappropriate conduct and activity taken against an individual because of his or her race, creed, color, religion, sex, sexual orientation, age, national origin, citizenship, documented status, veteran status, disability, marital, pregnancy status, or any other classification protected by law. Examples of prohibited harassment include, but are not limited to, jokes and or comments based on a person's protected status, and treatment of an individual differently because of his or her protected status as defined by federal, state or local acts, ordinances, executive orders, or rules prohibiting discrimination of any kind.

Violence and Threats: For purposes of this policy, threats of acts of violence, or the acts themselves, such as intimidation, aggression, coercion, bullying or any other physical or psychological acts, are prohibited conduct under this policy and must be reported to a supervisor or Human Resources immediately at hr@creospan.com.

Americans with Disabilities Act (ADA) Accommodation Policy

Employees are expected to be able to perform the essential functions of their positions. Qualified employees with disabilities or perceived disabilities may request reasonable accommodations in the performance of these functions. Creospan encourages employees to submit requests for reasonable accommodations. Such requests must be submitted to the Human Resources department at hr@creospan.com. The notice should include the nature of the disability along with the nature and duration of the requested accommodation. Creospan will cooperate with the employee and his or her health care provider in accordance with the Americans with Disabilities

Act and other standards provided by law. Medical confirmation may be requested.

Work Eligibility

Creospan is committed to employing only United States citizens and individuals who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility within three (3) business days of date of hire.

Immigration Assistance

In compliance with the Immigration Reform and Control Act of 1986 and any other applicable federal, state, or local laws, Creospan is committed to: (1) employing only those who are authorized to work in the United States, and (2) not discriminating based on national origin or citizenship in hiring, recruiting, or terminating employees. It is the policy of Creospan to sponsor employees' permanent residency based on each employee's qualification, eligibility, and mutual agreement. Decisions about sponsorship will be made by the Company's human resources department and management, in accordance with U.S. immigration law and policy, and based on what options are in Creospan's best interest.

Creospan retains the right to make reasonable decisions about immigration sponsorship that support the Company's business needs. Sponsorship does not alter the at-will employment relationship with sponsored workers and does not guarantee employment or engagement in a specific position. Creospan will make reasonable efforts in the immigration sponsorship process, but cannot guarantee any result. Creospan retains the right to end an immigration process at any point before or during the process. To apply for a Green Card, an employee must already have a valid work authorization (H-1B visa) in the United States. An employee seeking sponsorship must make an application to his or her supervisor—who will notify the appropriate person at the Company. Creospan will then inform the Company attorney of your decision to file for permanent residency and provide the necessary information required in the filing process.

U.S. Permanent Residence for Foreign Nationals (Green Card)

Summary: The US Permanent Residence for Foreign Nationals (Green Card) policy provides eligible employees the opportunity to gain permanent resident status in the US. This policy applies a fair and consistent approach to achieve the career aspirations of high-performing employees while meeting long term business requirements in a cost effective manner.

Eligibility Criteria and Approval Requirement

- One year of employment with Creospan
- 2000 billable hours in a year

EB Categorization

The EB category will be determined based upon the legal specifications for each EB category and the employee's role (per Creospan standard role definitions). US law requires applicants to be classified as:

- EB-2: If the position requires, and the employee holds, a US Master's degree or its foreign equivalent degree, or a US Bachelor's degree or its foreign equivalent degree, followed by five years of post-Bachelor's progressive experience.
- EB-3: If the position requires, and the employee holds, a US Bachelor's degree or its foreign equivalent degree, and less than five years of experience.

Payment of Fees and Costs

- Creospan will pay all fees and costs related to the PERM process for employees who are required to have an approved ETA-9089 PERM labor certification as part of the Permanent Residency process.
- Other than fees legally required to be paid by the employer as outlined above, the employee must pay all fees and costs related to the Green Card process, for themselves and any immediate family members as well as premium processing. These costs cannot be reimbursed to the employee.

If you have any questions about this policy, you should contact hr@creospan.com.

Consensual Personal Relationships in the Workplace

A consensual personal relationship is one in which two people are engaged by mutual consent in an emotional and physically intimate relationship. Creospan recognizes that employees who work together may become friends and, in some cases, form close personal relationships. The Company does not wish to interfere with personal relationships and is respectful of employees' private lives. However, Creospan has an obligation to ensure that professional standards are maintained in the workplace and recognizes that such personal relationships may conflict with working relationships and responsibilities.

To ensure that employment decisions are free from conflicts of interest and the compromised objective judgment likely to result from such conflicts, Creospan does not permit employees who are in a personal relationship with each other to participate in or directly influence the hiring, supervision, promotion, evaluation and determination of salary of one another. Any employee in such a relationship is required to advise the Human Resources Department at hr@creospan.com promptly of the existence of the relationship in order to ensure compliance with this provision. If an actual or potential conflict exists, the Company may take whatever action appears appropriate according to the circumstances, up to and including transfer or discharge. Failure to disclose facts

may lead to disciplinary action, up to and including termination.

Media Inquiries

Employees are not authorized to speak on behalf of Creospan to the media or anyone else outside the Company with inquiries regarding Creospan, its business, or its operations. Any such inquiries must be directed to the Company's CEO.

Expressing Breast Milk

Creospan will provide reasonable break time to an employee who needs to express breast milk for her nursing infant child. The break time shall, if possible, run concurrently with any break time already provided to the employee. Creospan will provide further reasonable break time for an employee to express breast milk for her nursing infant child, as needed by the employee. The break time will be provided for one year after the child's birth. Creospan shall make reasonable efforts to provide a room or other location, in close proximity to the work area, other than a toilet stall, where an employee can express her milk in privacy.

Personal Appearance

Dress, grooming and personal cleanliness standards contribute to the morale of all employees and affect the business image Creospan presents. During business hours and always when representing Creospan, employees are expected to present a professional, clean and neat appearance. Employees should consult with his or her supervisor if they have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability or to accommodate religious dress or grooming practices. If an employee's attire is deemed inappropriate by a supervisor or management, the employee will leave the work area until their return to the workplace in attire to be appropriate in the work setting. The supervisor and management will make the final decision on attire.

Smoking and Tobacco Use

Creospan seeks to provide a safe and pleasant work environment for its employees. The Company strictly adheres to all state and local smoking-related ordinances and prohibits smoking on work premises. Moreover, employees are expected to comply with client's policies on smoking and tobacco when at a client's workplace. If an employee is a smoker, which includes all tobacco products including e-cigarettes, vaping, chewing, sniffing, or any other form of using tobacco adherence to this policy is mandatory. The company may impose a surcharge on insurance costs to the employee for use of tobacco products.

Drug-Free Workplace

The policy of the Company is to maintain a drug-free workplace. As a condition of employment,

all Company employees must comply with this policy. The term “workplace” is defined as Company property, any Company sponsored activity, client location or any other site where the employee is performing work for or representing the Company. The term “drug” as used in this policy includes alcoholic beverages and prescription drugs, as well as illegal inhalants and illegal drugs and/or controlled substances as defined by federal, state, and local law. An employee who engages in an activity prohibited by this policy shall be subject to disciplinary action, up to and including immediate termination of employment.

The unlawful use, possession, purchase, sale, distribution, or being under the influence of any illegal drug and/or the misuse of legal drugs while on Company or client premises or while performing services for the company is strictly prohibited. Creospan also prohibits reporting to work or performing services under the influence of alcohol or consuming alcohol while on duty or during work hours. In addition, Creospan prohibits off-premises abuse of alcohol and controlled substances, as well as the possession, use, or sale of illegal drugs, when these activities adversely affect job performance, job safety, or the Company’s reputation in the community.

In the event that a supervisor has reasonable suspicion that an employee is under the influence of drugs or alcohol and such use could affect or has adversely affected the employee’s essential job functions, disciplinary action may be taken. Moreover, Creospan, in its discretion, may require that an employee participate in a drug and alcohol test if significant and observable changes in employee performance, appearance, behavior, speech, etc. provide reasonable suspicion of the influence of drugs and/or alcohol. Refusal to participate in a drug test may result in disciplinary action, including, but not limited to termination.

Creospan maintains a policy of non-discrimination and reasonable accommodation with respect to recovering addicts and alcoholics, and those having a medical history reflecting treatment for substance abuse conditions. We encourage employees to seek assistance before their substance or alcohol use renders them unable to perform their essential job functions or jeopardizes the health and safety of themselves or others. Please contact Human Resources at hr@creospan.com for any questions.

SAFETY & SECURITY

General Safety

The safety of our employees is very important. Creospan strives to provide a clean, hazard-free and safe environment in accordance with the Occupational Safety and Health Act (OSHA) of 1970 as well as any applicable state and local laws. We expect all employees to be safety-conscious, follow safety rules and to immediately alert management to any conditions in the workplace that are believed to be unsafe or unhealthy. It is the employee’s responsibility to learn emergency phone numbers and the location of all safety and emergency equipment. Violation of safety and security rules is a serious offense warranting disciplinary action, including termination.

You must immediately report all workplace injuries, accidents, or illnesses to your supervisor or

hr@creospan.com. Examples of reportable safety hazards include, but are not limited to, wet floors, broken equipment, and defective appliances. The Human Resources Department is responsible for this safety and security policy and thus you should contact hr@creospan.com if you notice violations of this policy or any unsafe conditions in the workplace. In no case should employees attempt to alter safety or emergency procedures since this may cause additional injury or loss of life. On occasion, Creospan will conduct inspections of the workplace. The Company will make efforts to inform its employees prior to these inspections.

Reporting of hazardous or unsafe conditions will not result in retaliation. If you feel you have been retaliated against for making such a report, you must immediately inform your supervisor or hr@creospan.com.

Property Searches

Employees have no expectation of privacy concerning Creospan's property, assets, or equipment or personal property an employee brings into the workplace including the premises where the office is located. Thus, all property, whether Creospan's or an employee's, may be searched by Creospan in appropriate circumstances. This includes, but is not limited to, an employee's personal vehicle that is parked on Creospan's property. When necessary, these searches will be limited in scope.

Weapons

It is the intent of the Company to provide a safe and secure workplace for employees, clients, customers of clients, visitors and others with whom we do business. The Company prohibits the possession of, while on Company property, any type of weapon, firearm, explosive and/or ammunition. For purposes of this policy, Company property includes, but is not limited to, all Company facilities, including offices, bathrooms and common areas, Company-provided parking areas, vehicles and equipment that are either leased or owned by the Company or a Company client. In addition, the Company strictly prohibits the carrying or possession of any weapon in a parking facility or parking area, including in employee-owned vehicles parked on Company property—with limited exceptions based on state or local law. Any exceptions to this policy will be stated in the relevant state handbook.

The possession of firearms or other weapons on Company property may be cause for discipline, including, but not limited to, immediate termination of employment. In enforcing this policy, the Company may request inspections of any employee and their personal effects while on Company property, to the extent allowable under applicable law. Any employee who refuses to allow such an inspection will be subject to discipline including, but not limited to, immediate termination of employment.

Employees within the Company share the responsibility of identifying violators of this policy. An employee who either witnesses or suspects another individual of violating this policy should immediately report this information to their onsite supervisor or to Human Resources.

Disposal of Files and Other Information

All files and documents must be stored and locked at the end of each workday—this includes appropriately securing your electronic devices, such as a computer, phone, or other device with Company or client information. Creospan strictly prohibits the disposal of files and documents in the trash. All discarded files and documents must be disposed in the appointed document containers for shredding. If a document is particularly sensitive, the employee must shred the document on the premises. Disregarding and failing to comply with this section of the Handbook is grounds for disciplinary action, up to and including termination.

Reporting Emergencies

It is vital to understand the importance of timeliness and accuracy in reporting an emergency situation so the appropriate action may be taken by internal and external response crews. All employees are expected to follow the safety guidelines published by the building's property manager. When in doubt, call 911.

Fire Prevention

Employees must become familiar with the location of the fire extinguishers in the workplace. Notify a supervisor if an extinguisher is used or if the seal is broken. Keep in mind that extinguishers that are rated ABC can be used for paper, wood or electrical fires. Make sure all flammable liquids are stored in approved and appropriately labeled safety cans and are not exposed to any ignition source.

In case of fire, employees should:

1. Dial 911.
2. Assist in evacuation of all employees from the area.
3. If possible, contact a supervisor or Human Resources.
4. Do not re-enter the building until directed to do so by the fire department or other proper authority.

Emergency Evacuation

In the event that employees are advised to evacuate the building, employees must use the following procedures:

1. Stop all work immediately.
2. Walk to the nearest exit, including emergency exit doors.
3. Exit quickly, but do not run. Do not stop for personal belongings.

4. Proceed, in an orderly fashion, to a safe area as directed by building security or other emergency response agencies.
5. Do not re-enter the building until instructed to do so.

Emergency Closings

Emergency conditions, such as severe weather and power outages, may cause Creospan offices or a client's office to close temporarily. The Company will seek to notify its employees as soon as practicable when such a closing will occur. Temporary employees will not be compensated for time not worked due to an emergency closing. Full-time, exempt employees must use PTO, if available, unless they can and are approved to work remotely.

Handbook Acknowledgement Form

The attached Handbook describes important information about Creospan, Inc. I understand that I should consult Human Resources regarding any questions not answered in the Handbook. I have entered my employment relationship with Creospan voluntarily, and acknowledge that there is no specified length of employment. Accordingly, either I or Creospan can terminate the relationship at will, with or without cause, at any time. I further acknowledge that I am an employee solely of Creospan and not an employee of any client of Creospan.

I acknowledge that this Handbook is not a contract of employment. I have received the Handbook, and I understand that it is my responsibility to read and comply with the policies contained in both the Handbook and any revisions made to them.

I also acknowledge that, as a part of the Handbook, I have received a copy of the Company's Electronic Communications and Storage Policy. I fully understand the terms and conditions of this policy and agree to abide by them.

I also understand that "Confidential Information" includes all non-public information of Creospan and its clients as defined under the attached Handbook's Confidentiality & Non-Disclosure policy.

I understand and acknowledge that I have a duty not to disclose Confidential Information of Creospan or its clients and that the damage caused by my disclosing Confidential Information would leave Creospan with an inadequate remedy at law entitling it to temporary, preliminary, and permanent injunctive relief against me in a court of competent jurisdiction in the event of such breach or threatened breach in addition to any other equitable relief including without limitation an accounting and/or disgorgement and/or any other damages as a matter of law.

Employee Signature: _____

Employee Name (Printed): _____

Date: _____