

January 2023

# WARBURGPINCUS U.S. Firm Guidelines

# WARBURG PINCUS FIRM GUIDELINES

NEITHER THIS HANDBOOK NOR ANY OTHER COMPANY GUIDELINES, POLICIES, OR PRACTICES CREATES AN EXPRESS OR IMPLIED EMPLOYMENT CONTRACT, BARGAIN, OR AGREEMENT OR CONFERS ANY CONTRACTUAL RIGHTS WHATSOEVER. EMPLOYMENT WITH THE COMPANY IS AT-WILL, AND EITHER THE EMPLOYEE OR THE COMPANY MAY TERMINATE EMPLOYMENT AT ANY TIME, WITH OR WITHOUT CAUSE OR REASON. NO REPRESENTATIVE OF THE COMPANY IS AUTHORIZED TO PROVIDE ANY EMPLOYEE, INDIVIDUALLY OR ON A COLLECTIVE BASIS, WITH AN EMPLOYMENT CONTRACT OR SPECIAL ARRANGEMENT CONCERNING THE TERMS OR CONDITIONS OF EMPLOYMENT UNLESS THE CONTRACT OR AGREEMENT IS IN WRITING AND SIGNED BY THE

\_\_\_\_\_.

\_\_\_\_\_  
*EMPLOYEE SIGNATURE*

\_\_\_\_\_  
*PRINTED NAME*

\_\_\_\_\_  
*DATE*

*The signed original copy of this receipt should be given to Human Capital. It will be filed in your personnel file.*

# OVERVIEW

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*Warburg Pincus, together with its affiliated companies, (hereafter referred to as “us,” “we,” or “the Firm”) prepared these Guidelines to assist you in finding answers to many of the most frequently asked questions regarding personnel policies, compensation, and time off, but no one reference source can address all situations. If you have any questions that are not directly addressed in these Guidelines or if you would like further clarification, please contact Human Capital.*

*The contents of this document are guidelines only, and supersede any prior Guidelines. The Firm reserves the right, in an individual case or generally, to amend, supplement, rescind or deviate from any provision of these Guidelines or any of its policies, practices, working conditions, or benefits at any time, as it deems appropriate, in its sole and absolute discretion, unless otherwise restricted by applicable law. Nothing in these Guidelines should be construed as a promise of specific treatment in any specific situation upon which any employee should rely. In addition, some of the subjects described here are addressed in greater detail in official plan or policy documents, including the Firm’s Compliance Policies and Procedures Manual. You should refer to these documents for specific information since these Guidelines only briefly summarize these subjects. In case of any discrepancy, the official plan documents, policy, or contract will govern.*

*The Firm Guidelines, as well as any other Firm policies or practices, are not an express or implied contract, bargain, or agreement, nor do they confer any contractual rights whatsoever or guarantee your employment at Warburg Pincus for any specific duration. Rather, unless otherwise provided by applicable law, your employment with Warburg Pincus is “at-will.” This means that either you or Warburg Pincus may terminate your employment at any time and for any reason, with or without cause and with or without notice. You should understand no supervisor, manager or other representative of Warburg Pincus, other than as expressly authorized by the Firm, has the authority to enter into any agreement with you, individually or on a collective basis, for employment for any specified period of time or to make any promises that are contrary to the Firm’s employment-at-will policy or other policies or procedures contained in these guidelines. To the extent that an expressly authorized representative of the Firm enters into such an agreement, such agreement shall not be enforceable unless it is in a written document signed by the authorized representative of the Firm and approved by Human Capital.*

*This notice applies to all employees regardless of date of hire. The most current version of the Firm Guidelines can always be found on the intranet.*

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# WORKPLACE POLICIES AND PROCEDURES

## ABOUT WARBURG PINCUS

Warburg Pincus LLC, together with its affiliated companies is a leading global private equity firm focused on growth investing. The Firm has more than \$40 billion in assets under management. Its active portfolio of more than 120 companies is highly diversified by stage, sector and geography. Warburg Pincus is an experienced partner to management teams seeking to build durable companies with sustainable value. Founded in 1966, Warburg Pincus has raised 15 private equity funds, which have invested more than \$58 billion in over 760 companies in more than 40 countries. The Firm is headquartered in New York with offices in Amsterdam, Berlin, Beijing, Houston, Hong Kong, London, Luxembourg, Mauritius, Mumbai, San Francisco, São Paulo, Shanghai and Singapore.

The Firm aspires to achieve its goals by adhering to the highest professional standards and by recruiting, employing, developing and retaining individuals capable of top-quality performance. Our atmosphere is one that promotes and values teamwork and professionalism, and we are committed to professional excellence and personal integrity. Each employee of the Firm is expected to adhere to the Firm's principles, policies and procedures, many of which are outlined in these Guidelines, to behave in a manner reflective of the Firm's standards and culture, and to take responsibility for achieving our organization's success.

## BUILDING ACCESS/ID CARD

The Firm's New York headquarters is located at 450 Lexington Avenue. The building access/ID card provides access through the lobby turnstiles and into the offices of the Firm. Employees, consultants and temporary staff (approved by HR) receive a building access card upon joining the Firm and return the card upon leaving the Firm. Lost cards should be reported to Office Services immediately so they can be deactivated. These cards must also be presented — along with a building pass — for the removal of boxes and large packages from the building. Building passes are available from Reception and Office Services.

## VISITORS

All Warburg Pincus visitors should be entered into the Building Security's online visitor list prior to arrival along with their expected time of arrival. Lobby security will direct all visitors to the Firm's Reception area located on the 36th floor. Reception is open from 8:00 AM to 7:00 PM Monday – Friday. Once visitors are greeted and announced by Reception, they must be escorted through the premises to their destination. Meetings held in the New York office including external visitors should take place in the meeting areas of the Conference Center on the 36th floor.

## PERSONAL PROPERTY

The Firm is not responsible for lost or stolen personal property. Purses and wallets should not be visible on desks during the day. All personal property and any small equipment should be locked up at night. Please note that the Firm cannot insure items of a personal nature maintained at our offices. Such items include, but are not limited to, fine arts, electronic components, clocks and artifacts.

## ADMINISTRATIVE SERVICES

Office Services provides maintenance, copy services and mailroom services for the Firm. Please note the use of any of these services (FedEx, First Class mail, Messenger services and copy services) is strictly for business purposes.

## SERVICE VENDORS

Messengers and delivery people are not permitted beyond Reception. Outside repair and maintenance personnel are managed by Office Services. All food deliveries are managed by Dining Services or Office Services.

## CODE OF CONDUCT

Warburg Pincus requires that its employees maintain proper standards of conduct at all times to succeed as a Firm and to promote efficiency, productivity and cooperation among its employees. Employees who fail to maintain proper standards of conduct toward their work, their co-workers or Warburg Pincus' clients, or who violate the Firm's policies, are subject to disciplinary action, up to and including termination of employment. Generally, no conduct that is unproductive, unethical, illegal or violent will be tolerated. All instances of misconduct should be referred to Human Capital immediately and Warburg Pincus reserves the right to act in any circumstance where it deems appropriate.

Below is a list of examples of conduct which may result in disciplinary action, up to and including termination of employment:

- Being under the influence of alcohol or illegal or controlled substances during work hours
- Fighting on the job or threatening co-workers or clients with bodily harm
- Breaching confidentiality including covert recordings of meetings or conversations
- Willful or careless destruction or damage to Warburg Pincus property or equipment or to property or equipment of another employee
- Unauthorized use or taking of any other person's property
- Violation of safety or operating rules
- Carrying or possessing a weapon of any kind on Firm property, unless such prohibition is otherwise restricted by applicable law

- Excessive absenteeism or tardiness for reasons other than those protected by applicable law
- Unexcused absence or tardiness or leaving the job without permission
- Falsifying reports or Firm records
- Smoking on workplace premises

These examples are not intended to be exhaustive. Notwithstanding the foregoing examples, employees of the Firm are employed at-will and may be terminated at any time for any reason or for no reason, with or without notice.

Warburg Pincus LLC is registered as an investment adviser with the U.S. Securities and Exchange Commission effective as of March 30, 2012. Registration requires the Firm and its employees to comply with a number of rules and regulations under the Investment Advisers Act of 1940, including a Code of Ethics. The Firm's Code of Ethics is set forth in the Compliance Policies and Procedures Manual, with which all employees and others designated by the Firm must be familiar.

## DIVERSITY, EQUITY AND INCLUSION POLICY

Warburg Pincus is committed to creating, cultivating and sustaining a culture of diversity, equity and inclusion. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of our culture, our reputation and the Firm's collective achievements.

In the same way that we seek out diversity in our global investments, we embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other protected characteristics that make our employees unique.

Warburg Pincus' diversity initiatives are applied to our practices and policies on recruitment and candidate selection; compensation and benefits; professional development and training; promotions; transfers; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation among all employees.
- Teamwork and employee participation, welcoming the representation of all groups and employee perspectives.
- Employer and employee contributions to the communities in which we live and work, and in which our portfolio companies operate.

All employees have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work

functions on or off the work site, and at all other company-sponsored and participative events. Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action up to and including termination.

Employees who believe they have been subjected to any kind of discrimination that conflicts with this policy and / or our EEO policy should raise it to the attention of their supervisor or a Human Capital colleague.

## EQUAL EMPLOYMENT OPPORTUNITY (EEO POLICY)

### GENERAL POLICY

Employees of the Firm represent a diversified pool of individuals serving management and staff positions in the various areas of our business. It is our policy to provide equal employment opportunity to all applicants and employees without regard to their actual or perceived race, color, creed, religion, national origin, alienage, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions and lactation), disability, protected medical condition as defined by applicable state or local law, marital status, sexual orientation, military service and veteran status, gender identity or expression (including transgender status), genetic information, or any other protected characteristic as defined by applicable federal, state, or local law (hereinafter, the Protected Classes) in all personnel matters including, without limitation, recruiting and hiring, compensation, opportunities for advancement (including promotion and transfers), evaluation, training, discipline and termination.

An essential part of this policy is to provide a working environment for all employees that is free of harassment, intimidation or retaliation on the basis of any protected classifications. Sexual harassment, as well as harassment targeted at the Protected Classes is expressly prohibited.

### DISABILITY ACCOMMODATION

We will endeavor to make a reasonable accommodation to applicants and employees who have requested an accommodation or for who the Firm has notice may require such an accommodation, without regard to any protected classifications, related to an individual's: (i) disability, meaning any physical, medical, mental, or psychological impairment, or a history or record of such impairment; (ii) sincerely held religious beliefs and practices; (iii) needs as a victim of domestic violence, sex offenses or stalking; (iv) needs related to pregnancy, childbirth or related medical conditions; and/or (v) any other reason required by applicable law, unless the accommodation would impose an undue hardship on the operation of our business. Any individual who would like to request an accommodation should contact Human Capital.

### COMPLAINT RESOLUTION PROCEDURES

In the event an employee believes they have been subjected to discrimination (including unlawful harassment) in violation of the EEO policy, such individual should utilize the procedures in the "Complaint Resolution Procedures" section of the Policy Against Discrimination and Harassment.

## POLICY AGAINST DISCRIMINATION AND HARASSMENT

Warburg Pincus is committed to a work environment in which all individuals are treated with respect and dignity, free of discrimination and harassment, including sexual harassment, on any basis protected by applicable federal, state, or local law. It has been and remains the policy of the Firm to prohibit discrimination and harassment, including sexual harassment, of one employee by another employee, partner, supervisor, business associate, customer, client or guest of the Firm. These behaviors are unacceptable in the workplace and in any work-related settings such as business trips and Firm sponsored social functions.

The purpose of this policy is to ensure that in the workplace no one individual may discriminate against or harass another individual on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions and lactation), disability, protected medical condition as defined by applicable state or local law, marital status, sexual orientation, military service and veteran status, gender identity or expression (including transgender status), genetic information, or any other protected characteristic as defined by applicable federal, state, or local law (hereinafter, the Protected Classes).

In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic pursuant to applicable federal, state, or local laws and ordinances also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment are unlawful.

### PERSONS COVERED

This policy applies to everyone in the Firm. No partner, officer, employee or agent of the Firm is authorized to engage in acts of discrimination or harassment against anyone based on any of the Protected Classes in violation of this policy. Everyone has a responsibility to maintain a workplace that is free from any discrimination or form of harassment prohibited by this policy.

### DISCRIMINATION DEFINED

Discrimination under this policy means treating differently or denying or granting a benefit to an individual because of the individual's protected class.

### HARASSMENT

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any protected characteristic when: (1) submission to that conduct is made either explicitly or implicitly a term or condition of an individual's employment; or (2) submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures



or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it is not unlawful. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

**SEXUAL HARASSMENT**

Sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favors and other verbal, visual or physical conduct of a sexual nature when (1) submitting to that conduct is made either explicitly or implicitly a term or condition of employment; (2) submitting or rejecting such conduct is used as a basis for any decision affecting an individual's employment; or (3) that conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. By way of example, no person shall threaten or insinuate, either explicitly or implicitly, that another person's refusal to submit to sexual advances will adversely affect that person's employment, work status, evaluation, wages, advancement, assigned duties, shifts, or any other term, condition or privilege of employment or career development. Similarly, no individual shall promise, imply or grant any preferential treatment or employment opportunities in return for sexual favors. Other examples of sexual harassment may include unwelcome sexual flirtations, advances or propositions, verbal abuse of a sexual nature, subtle pressure or requests for sexual activities, inappropriate touching or intimacy, graphic or verbal commentaries about an individual's body, sexually degrading words used to describe an individual, a display in the workplace or to any employee or applicant of sexually suggestive objects or pictures, negative stereotyping based upon gender, sexually explicit or offensive jokes, sexual remarks, epithets, slurs or physical assault.

**COMPLAINT RESOLUTION PROCEDURES**

**1. Initiation of Complaint**

Any employee who believes that they are a victim of discrimination or any form of harassment, whether by a supervisor, a co-worker or any other person with whom the individual comes in contact with or who witnesses conduct they believe may violate this policy or the EEO policy, should report the complaint or conduct promptly to their manager or a member of Human Capital listed below:

Sandra Wishnick  
Director, Human Capital  
450 Lexington Avenue  
New York, NY 10017  
Phone: 212-878-9232

Lisa Ferraro  
Director, Human Capital  
450 Lexington Avenue  
New York, NY 10017  
Phone: 212-878-9257

An employee who is either unsure of the appropriate person to whom to raise an issue of perceived harassment or who has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment should contact the Chief Human Capital Officer:

Adrienne Filipov  
Chief Human Capital Officer  
450 Lexington Avenue  
New York, NY 10017  
Phone: 212-878-9242

A complaint against a supervisor or someone in a more senior position in the Firm should not be reported directly to that individual but should instead be reported directly to one of the other individuals listed immediately above or to any member of the Executive Management Group. Complaints may be made verbally or in writing, but should be made in a timely manner following the incident so that a prompt investigation can occur. A sexual harassment complaint form can be found on the Firm's intranet under the Human Capital section, please note this form is optional. Once a complaint is received, the Firm will be responsible for, as it considers appropriate, investigating the complaint, reporting the results of the investigation and, where an action is determined to be appropriate, to inform the parties of the steps that will be taken to correct the situation.

Any manager or supervisor who receives a complaint of sexual or other harassment from an employee or who otherwise knows or has reason to believe that an employee is or has been subjected to any such harassment is expected to report the incident promptly to one of the individuals listed above for investigation.

**2. Investigation**

Once a complaint is received, the Firm will be responsible for promptly, fairly, and thoroughly investigating the complaint as it considers appropriate. An investigation may include interviews with the complainant, the alleged offender, and any other persons the Firm deems appropriate. Relevant documents may also be reviewed. Employees are required to cooperate in all investigations. The Firm will endeavor to maintain confidentiality to the extent practicable, but confidentiality cannot be guaranteed. After its investigation, if the Firm believes its non-discrimination/harassment policies have been violated, it will exercise its discretion to impose disciplinary action on the offending employee, up to and including termination of employment. Reporting the results of the investigation and, an individual who remains unsatisfied after an investigation, may direct a written request for review to any member of the Executive Management Group, which may, if it deems appropriate in its reasonable discretion, direct or conduct an independent investigation concerning the complaint.

**3. Disciplinary Action**

Corrective action will be taken whenever violations of the EEO Policy or this policy are determined to have occurred. The disciplinary action that may be imposed against the offending party for violation of this policy or the EEO Policy may include, by way of example only, written warning, suspension or termination of employment of the offending



party. Anyone interfering with or providing information that the individual knows to be inaccurate during an investigation pursuant to this policy or the EEO policy may be subject to disciplinary action, up to and including termination of employment. In addition to being a violation of this policy, harassment, discrimination or retaliation can also be against the law. Employees who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

#### ***Third-Party Harassment***

Any person who believes that they have been discriminated against or harassed on a basis prohibited by this policy by a third party (i.e., a non-employee of the Firm doing business with the Firm) should report the incident promptly in accordance with the above procedures. The complaint will be investigated in a manner similar to that set forth above.

#### ***Non-Retaliation***

Retaliation against employees or applicants who report incidents of discrimination or any form of harassment prohibited by this policy, or who participate in an investigation of discrimination or any form of harassment prohibited by the policy, is strictly prohibited. In addition, employees and applicants are protected from coercion, intimidation, interference or discrimination as a result of reporting violations or assisting in investigations in good faith. Individuals who believe they have been retaliated against because of a complaint made by them or due to their participation in an investigation should immediately report the matter in accordance with the procedures set forth in this policy. Any individual who retaliates against an employee or applicant who complains about discrimination or harassment or who participates in the investigation of a complaint will be subject to disciplinary action, up to and including termination of employment. Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to: any action that would discourage or keep an individual from reporting discrimination, harassment or retaliation; shunning and avoiding an individual who reports discrimination, harassment or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting discrimination, harassment or retaliation; and denying employment benefits because an applicant or employee reported discrimination, harassment or retaliation or participated in the reporting and investigation of discrimination, harassment or retaliation.

## **LACTATION BREAKS**

In accordance with applicable laws, the Firm will provide nursing employees a reasonable amount of paid break time to express breast milk for a child as required by law. The Firm's policy is to allow employees to take reasonable paid time for lactation breaks. If possible and permitted by applicable law, the break time must run concurrently with rest and meal periods already provided to the employee. Employees are asked to give notice of their intent to use the benefit provided pursuant to this policy. Warburg Pincus will make a reasonable effort to provide the employee with use of a room or other location, other than a

bathroom, in close proximity to the employee's work area, for the employee to express milk in private. No employee who chooses to express milk in the workplace will be discriminated or retaliated against in any way for exercising their rights under this policy.

## **PREGNANCY ACCOMMODATIONS**

In compliance with applicable law the Firm will not discriminate against an applicant or employee because of pregnancy, childbirth, related conditions, or breastfeeding. If an applicant or employee requests a reasonable accommodation due to health conditions related to pregnancy or the physical recovery from childbirth, or breastfeeding, the Firm will endeavor to provide a reasonable accommodation to enable applicants and employees to perform the essential functions of the job, unless the accommodation would impose an undue hardship on the operation of the Firm's business. The Firm will engage in a timely, good faith, and interactive process with the employee to determine effective, reasonable accommodations for the employee for conditions related to pregnancy, physical recovery from childbirth, or a related condition.

Reasonable accommodations may include but are not limited to: more frequent or longer break periods; more frequent restroom, food, and water breaks; acquisition or modification of equipment or seating; limitations on lifting; temporary transfer to a less strenuous or hazardous position if available, with return to the current position after pregnancy; job restructuring; light duty, if available; assistance with manual labor; modified work schedules; providing leave to recover from childbirth or pregnancy; as well as accommodations for lactation such as providing private (non-bathroom) space for expressing breast milk and breastfeeding.

The Firm will not require an applicant or employee affected by pregnancy, physical recovery from childbirth, or a related condition to accept an accommodation that the individual chooses not to accept if the individual did not request an accommodation or if the accommodation is not necessary for the applicant or employee to perform the essential functions of the job, nor will the Firm require a pregnant employee to take leave if another reasonable accommodation is available which will permit the employee to continue working.

The Firm may require certification from the employee's health care provider concerning the employee's need for a reasonable accommodation to the same extent such a certification is required for other conditions related to a disability. A certification should include: (1) medical justification for the requested accommodation(s); (2) a description of the reasonable accommodation(s) medically advisable; (3) the date the accommodation(s) became advisable; and (4) the probable duration of the reasonable accommodation(s). The Firm will not take adverse action against a pregnant employee who requests or uses a reasonable accommodation related to pregnancy, physical recovery from childbirth, or a related condition. The Firm will not deny employment opportunities to an applicant or employee based on the need to make a reasonable accommodation related to the applicant's or employee's pregnancy, physical recovery from childbirth, or a related condition.

If employees have any questions concerning this policy, they should contact Human Capital.

## LEAVE FOR DOMESTIC/SEXUAL VIOLENCE POLICY

Unless otherwise required by applicable law, employees who are victims of a crime or abuse, including domestic or family violence, sexual assault, stalking, gender violence or any other crime of violence, may take up to twelve (12) weeks of unpaid leave in any 12-month period for the following reasons:

- to seek medical attention for injuries caused by crime or abuse;
- to obtain services from a domestic violence shelter, program, rape crisis center or victim services organization or agency as a result of the crime or abuse;
- to obtain psychological counseling or mental health services for the employee, the employee's children or a family member related to an experience of crime or abuse;
- to participate in related court proceedings; or
- to participate in safety planning and take other actions to increase safety from future crime or abuse, including temporary or permanent relocation.

Unless otherwise required by applicable law, employees are covered as victims and entitled to leave under this policy if they are:

- a victim of stalking, domestic violence or sexual assault;
- a victim of a crime that caused physical injury or that caused mental injury and a threat of physical injury; or
- a person whose immediate family member is deceased as the direct result of a crime.

The Firm may require proof of an employee's participation in these activities, unless otherwise restricted by applicable law. The Firm will make every attempt to ensure documents provided in support of a domestic violence leave request under this policy remain confidential and protected from disclosure unless required by law. Whenever possible, employees must provide Human Capital reasonable notice before taking any time off under this policy. In cases of imminent danger to the health and safety of the employee, reasonable advance notice is not required.

Leave may be taken consecutively, intermittently (in separate blocks of time) or on a reduced leave schedule (reducing the usual number of hours worked per workweek or work day). Leave under this policy is unpaid, but employees may substitute any accrued paid time off benefits for the unpaid leave provided under this policy. Leave under this policy does not extend the time allowable under the "Family and Medical Leave Act" Policy.

### EMPLOYEE BENEFITS

During an approved leave, the Firm will maintain the employee's health benefits as if the employee continued to be actively employed. If paid time off is substituted for unpaid leave, the Firm will deduct the employee's portion of the any applicable health plan premium as a regular payroll deduction. If the employee's leave is unpaid, the employee must make arrangements with Human Capital prior to taking leave to pay their portion of any applicable health insurance premiums each month. If the employee elects not to return to work at the end of the leave period, the employee will be required to reimburse the

Firm for the cost of the health benefit premiums paid by the Firm for maintaining coverage during the unpaid leave period, unless the employee cannot return to work because of continuation, recurrence, or onset of domestic or sexual violence or other circumstances beyond the employee's control.

### PERIODIC REPORTS

During a leave, an employee must provide periodic reports (at least every thirty (30) days) regarding the employee's status and any change in the employee's plans on returning to work.

### RETURNING FROM LEAVE

Upon returning from leave, employees will be restored to the same or an equivalent position.

No employee will be subject to discrimination or retaliation because of the employee's status as a victim of a crime or abuse, including crime or abuse related to domestic violence, sexual assault, or stalking. Victims of crime or abuse, including crime or abuse related to domestic violence, sexual assault, or stalking, may also request other accommodations in the workplace such as implementation of safety measures.

## SUBSTANCE ABUSE

To help ensure a safe, healthy, and productive work environment for our employees and others, protect Firm property, and ensure efficient operations, the Firm has adopted a policy of maintaining a workplace free of drugs and alcohol.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale, or distribution of controlled substances, drug paraphernalia, or alcohol by an individual anywhere on Firm premises, while on Firm business (whether or not on Firm premises), while driving a Firm vehicle or driving a personal vehicle for Firm business, or while representing the Firm, is strictly prohibited. Employees and other individuals who work for the Firm also are prohibited from reporting to work or working while they are using or under the influence of alcohol, any drugs as well as any controlled substances which may impact an employee's ability to perform his or her job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work. However, to the extent permitted by and in accordance with applicable law, this exception does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a policy violation or a positive drug test, to the extent you are subject to any drug testing requirement. Violation of this policy may result in disciplinary action, up to and including termination of employment.

The Firm maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist employees recovering from substance and alcohol dependencies, and those who have a medical history that reflects treatment for substance

abuse conditions. However, employees may not request an accommodation to avoid discipline for a policy violation.

## WORKPLACE VIOLENCE

We are strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and visitors and damage to Firm and personal property.

Threats, threatening language or any other acts of aggression or violence made toward or by any Firm employee will not be tolerated. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious and/or destructive action undertaken for the purpose of domination or intimidation.

Weapons are prohibited on Firm premises, unless such prohibition is restricted by applicable law. Employees should immediately report all potentially dangerous situations, including threats by coworkers, to any member of management with whom they feel comfortable. Reports of threats may be kept confidential to the extent maintaining confidentiality does not impede our ability to investigate and respond to the complaints. All threats will be promptly investigated.

No employee will be subjected to retaliation, intimidation, or disciplinary action as a result of reporting a threat in good faith under this policy.

If an investigation confirms that threat of a violent act or violence itself has occurred, the Firm will take swift and appropriate corrective action up to and including termination of employment of the threatening party.

Employees threatened by an outside party should follow the same steps detailed in this section.

Questions about this policy should be directed to Human Capital.

# EMPLOYMENT POLICIES AND PROCEDURES

## EMPLOYMENT STATUS

### “AT-WILL” EMPLOYMENT

Unless otherwise provided for by applicable law, employment at the Firm is “at-will.” Employment can be terminated at any time by either the Firm or the employee for any reason or for no reason, with or without notice. Nothing contained in these guidelines is intended to constitute a contract of employment between the Firm and any employee, and nothing contained in these Guidelines or otherwise creates a guarantee of your employment for any period of time. No supervisor or other representative of the Firm, other than as expressly authorized by the Firm, has the authority to enter into any agreement with you, individually or on a collective basis, for employment for any specified period of time or to make any promises that are contrary to this employment at-will policy or other policies or procedures contained in these guidelines. To the extent that an expressly authorized representative of the Firm enters into such an agreement, such agreement shall not be enforceable unless it is in a written document signed by the authorized representative of the Firm and approved by Human Capital.

### EMPLOYMENT CLASSIFICATIONS

Each employee is designated as either salaried or hourly as follows:

#### Salaried Employee

A salaried employee is an employee who is employed to work on a full-time or part-time basis. A full-time salaried employee is employed to work a 40-hour workweek, which includes a paid lunch hour. A part-time salaried employee is employed to work less than a 40-hour workweek. The number of hours a salaried employee works will affect the employee’s eligibility for certain benefits. A salaried employee who is employed to work a minimum of a 30-hour workweek, which includes a paid lunch hour, is eligible to participate in the Warburg Pincus benefits program, subject to its terms. Salaried employees employed to work less than 30 hours per week, or on a seasonal basis such as interns, are not eligible to participate in the Warburg Pincus benefits program. A part-time salaried employee who works less than a 40-hour workweek is eligible to receive pro-rated paid time off (PTO), paid Firm holidays (if a holiday happens to fall on a salaried part-time employee’s regular workday and any discretionary year-end bonus benefits (in accordance with the Firm’s bonus policy. Part-time salaried employees who work fewer than five days per week shall not receive an extra day off if a Firm holiday falls on the employee’s regularly scheduled day off.

Regardless of hours worked, a part-time salaried employee must meet the appropriate plan eligibility requirements to be eligible for group insurance and retirement benefits as defined in the plan documents.

Salaried seasonal employees, such as interns, employed to work full-time for a specific period of time are not eligible to receive pro-rated PTO but are eligible to receive paid Firm holidays that fall during the employee’s period of employment.

### Hourly Employee

An hourly employee is employed to work on either a full-time or a part-time basis. An hourly full-time employee is employed to work a 40-hour workweek and a part-time employee is employed to work less than a 40-hour workweek. Unless otherwise required by applicable law or the Firm's benefits plans, an hourly employee is not eligible to participate in the Warburg Pincus benefits program, will not be paid for Firm holidays that fall during the employee's period of employment and is not eligible for PTO. In order to receive the correct compensation, time reports for all hours worked must be approved by the appropriate supervisor or Human Capital.

If the Firm agrees to change an hourly employee's status to salaried, the employee is considered for all purposes as a new employee from the effective date of the change of status, regardless of the duration of the hourly employment, unless otherwise required by applicable law. Prior service credit for the period of hourly employment will not be granted for the purpose of calculating PTO, paid sick time or medical leave accruals or seniority as defined in these guidelines, unless otherwise required by applicable law.

Each employee is also designated as either **exempt** or **non-exempt** as follows:

### Exempt Employee

An exempt employee is a salaried employee who is exempt from the overtime provisions of federal and applicable state wage and hour laws. Exempt employees are NOT eligible to receive overtime pay; they receive a salary intended to cover all hours worked, including any hours worked in excess of 40 in a workweek or overtime as otherwise mandated by applicable state law.

### Non-Exempt Employee

A non-exempt employee is one whose job duties are not exempt from the overtime provisions of federal and applicable state wage and hour laws. Non-exempt employees are eligible to receive overtime pay in accordance with applicable law. Salaried Non-exempt employees are eligible for overtime at the rate of time and one half for any hours worked in excess of 40 hours per week and straight time for all hours worked between their regular scheduled hours and 40 hours. California employees please refer to the California Supplement. All non-exempt employees will be paid for a lunch hour, regardless of whether or not an individual chooses to work during an authorized meal period.

Employees are informed of their initial employment classification and status as exempt or nonexempt upon commencing employment. If an employee changes position during the employee's employment as a result of a promotion, transfer or otherwise, management will inform the employee of any change in the employee's job classification.

## PRE-EMPLOYMENT REQUIREMENTS

Your employment is contingent upon your signing the Firm's standard forms of employment and other forms required of employees generally, and the approval by the Firm of the results of a pre-employment background screening investigation (for which you will be

required to provide certain information) and a drug test, to the extent permitted and in accordance with applicable law. All results from these reports are kept confidential and are viewed only by persons at the Firm who have a direct responsibility in the hiring process. Any results from these reports that the Firm determines are grounds for denying employment will be discussed with you in accordance with applicable law. Under applicable law, the Firm is subject to regulations governing political contributions by certain of its employees (commonly known as "pay to play" rules). As such, for certain positions where you may be involved in, or supervising persons who may be involved in, soliciting governmental entities for certain types of business, you will be required to disclose your political contributions during a period that may run up to two (2) years prior to your effective date of employment, and additional restrictions may apply to political contributions you make during the course of your employment. Please refer to Compliance Manual to understand your obligations regarding your political contributions as an active employee.

## ELIGIBILITY FOR EMPLOYMENT

The Immigration Reform and Control Act of 1986 requires all employees to verify their employment authorization under oath by signing INS Form I-9 at the time of hire and provide original documentation proving their identity and authorization to work in the United States within three (3) business days of commencing employment. Failure to provide the required information in a timely manner will result in a determination that the employee is ineligible for employment in the United States and hence cannot be employed by the Firm.

## WORK SCHEDULE

### *(Not applicable to San Francisco employees)*

All full-time salaried employees are employed based on a 40-hour workweek, which includes a paid lunch hour. With certain exceptions, the regular workweek is Monday through Friday, commencing at 9:00 AM and concluding at 5:00 PM in each location's applicable time zone in which you report to. Upon commencement of employment, your manager will advise you of your work schedule. If you are required to work on a weekend or holiday, prior written approval from your manager must be obtained. If you need to go into the office, Office Services must be advised, as building security will need to be aware of all employees who are permitted in the building outside of business hours.

The Firm's U.S. Offices operate, until further notice, on a hybrid work schedule of three mandatory in-office days - working in-person in one of our three physical offices in NY, California, or Texas - on Monday, Tuesday, and Wednesday, and two optional work-from-home days, Thursday, and Friday (unless traveling for work on Thursday or Friday). The hybrid work schedule does not apply to roles that require working five days a week in the office, i.e., Office Services and Reception. The Firm has the following designations for all employees:

## Remote

Employees who will primarily work from their home location for their convenience and whose role permits this. Warburg Pincus does not require anyone to work from their home.

## Hybrid

Employees who are required to be in their primarily assigned office three days a week and have the option to work from home for their convenience the other two days.

For all roles, business needs prevail on the two optional work-from-home days, and if an in-person meeting or travel is required on Thursday and Friday, all colleagues are expected to accommodate that and attend in-person in addition to working from the office Monday-Wednesday (unless travelling during the Monday-Wednesday days). Please note that working completely remotely is not a right but a benefit that can be granted if business needs allow it. Not all roles are eligible for a Remote Work Schedule.

## FLEX-TIME EMPLOYEES/ALTERNATIVE WORK SCHEDULES

In certain circumstances, Warburg Pincus may approve a flex schedule or alternative work arrangement for individuals. Flex-time and alternative work arrangements require prior written approval from your manager and Human Capital. All flex-time and alternative work arrangements are considered on a case-by-case basis based on the needs of the Firm and may be modified or terminated at any time by the Firm, in its sole discretion and in accordance with applicable law.

## ATTENDANCE AND PUNCTUALITY

The Firm expects each employee to be ready for work at the start of the employee's regular business day. Attendance and punctuality are important factors in evaluating your overall performance and will be taken into account when considering compensation increases and determining suitability for promotion.

All employees are expected to notify their manager of all absences and expected lateness as early as possible in order to adjust work schedules accordingly. If you need to leave work early, you must notify your immediate supervisor and obtain permission before leaving work.

In evaluating employee attendance and otherwise administering this policy, the Firm does not consider absences/tardiness/early departures protected by applicable federal, state, or local law.

Please note that the violation of this policy may result in disciplinary action, up to and including termination of employment.

## DRESS CODE

Warburg Pincus expects each employee to maintain a neat, well-groomed appearance at all times. Employees should avoid extremes in dress (no sweat suits, shorts, mini-skirts, stretch stirrup or denim clothing; no tennis shoes, sneakers). If a manager feels an employee's attire is inappropriate, the employee may be asked to leave the workplace until properly attired. Appropriate personal appearance is an ongoing requirement of Warburg Pincus.

Nothing in this policy or any related guideline is intended to discriminate against an employee's sincerely-held religious beliefs or practices, disability, race or any other basis protected by applicable law. Employees who may need an accommodation based on a sincerely-held religious belief or practice, disability, race or any other basis protected by applicable law can contact Human Capital.

## INSPECTIONS

The Firm reserves the right to require employees on either Firm property or on a client's property to agree to the inspection of their person, personal possessions, property, a personal vehicle parked on Firm or client property, and work areas. This includes lockers, vehicles, desks, cabinets, work stations, packages, handbags, briefcases, and other personal possessions or places of concealment, as well as personal mail sent to the Firm or to its clients. Employees are expected to cooperate in the conduct of any search or inspection. **Employees should have no expectation of privacy in any personal items brought into the workplace or in any Firm work area or property used by the employee, whether or not locked with an employee or Firm lock.**

## FIRM-PROVIDED TECHNOLOGY POLICY

All Firm computers, PDAs, smartphones, email, instant messages, internet access accounts, voice mail systems, wireless remote access devices and Firm-issued cell phones, referred to collectively in these guidelines as ("Firm-Provided Technology") are the Firm's property and are intended for official Firm business. Likewise, any data collected, downloaded and/or created and any communications sent or received using Firm-Provided Technology is the exclusive property of the Firm and may not be copied or transmitted to any outside party or used for any purpose not directly related to the business of the Firm.

As a practical matter, personal use must not interfere with performance or operations and must not violate any Firm policy or applicable law. Employees are strictly prohibited from using Firm Provided Technology for the following purposes:

- Transmitting, retrieving, downloading or storing messages or images that are discriminatory, defamatory or sexual in content or otherwise inappropriate in a business environment in violation of the Firm's EEO policy or Policy Against Discrimination and Harassment
- Making threatening or harassing statements to another employee or to a vendor, customer or outside party in violation of the Firm's EEO policy, Policy Against



#### Discrimination and Harassment or Workplace Violence policy

- Sending or receiving confidential or copyrighted materials without proper authorization in violation of any applicable policy or agreement regarding confidential information
- Gambling of any kind or visiting adult sites
- Transmitting unsolicited junk mail or chain letters

The Firm's policies including, but not limited to, those prohibiting harassment, in their entirety, apply to the use of Firm-Provided Technology. Additionally, employees may not use Firm-Provided Technology in violation of any law including, but not limited to, those related to copyrights and software piracy.

## SOCIAL MEDIA

The Firm understands that employees may participate in social networking on or through websites or services such as Twitter, Facebook, or similar sites/services (collectively "social media") unrelated to the Firm's business. However, to protect the Firm's interests and ensure employees focus on their job duties, employees must adhere to the following rules:

- Use of social media and personal email accounts for any purpose relating to the investment advisory business of the Firm is prohibited (i.e. the Firm's investment activity, performance and fundraising activity). Although, employees are permitted to identify Warburg Pincus as their employer and to describe in general terms the duties they perform as an employee.
- Employees may not use social media during working time, unless specifically authorized to do so as part of their job duties.
- All policies and regulations regarding confidential and proprietary business information apply in full to social media. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed through social media.
- Employees may not use the Firm's logos or trademarks for commercial purposes or to endorse any product or service.
- Any conduct which is impermissible under the law if expressed in any other form or forum is impermissible if expressed through social media. For example, posted material that is discriminatory, obscene, defamatory, libelous, or threatening is forbidden.

All other Firm policies apply equally to employee blogging. Employees should review these guidelines for further guidance.

The Firm encourages all employees to keep in mind the speed and manner in which information posted through social media can be relayed (and often misunderstood) by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their manager. When in doubt, do not post! Failure to follow these guidelines may result in discipline, up to and including termination

of employment. In enforcing this policy, the Firm reserves the right to monitor social media activities of employees, whether or not such activities are conducted with Firm resources, to the extent permitted by and in accordance with applicable law.

Nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment.

## TECHNOLOGY AND MONITORING/ SECURITY POLICY

Subject to applicable law, the Firm reserves the right to retain, access, inspect, monitor and disclose all information created, received, sent or downloaded over Firm-Provided Technology, without notice to users, for any purpose whether stored on the Firm's information retention systems or a third party service provider's system, to the maximum extent permitted by applicable law. Employees should have no expectation of privacy in, and should not expect that any information or communications received or sent using Firm-Provided Technology will be confidential or private or that deleted information is necessarily untraceable. Employees should be aware that any information conveyed via Firm-Provided Technology may be required to be disclosed publicly or in civil, criminal or regulatory proceedings and that employees' Firm-Provided Technology accounts may be subject to compliance reviews or monitoring upon request of a legal authority or industry regulator.

Each employee has a duty of care to ensure that the information of the Firm is secure, accessible by management and protected. This duty of care includes not disabling or interfering with the security and monitoring software issued by the Firm, or such systems employed by the Firm.

It is essential that each person establish an appropriate password to foster the privacy and security of the Firm-Provided Technology systems. The use of passwords is for the protection of the Firm, not the employee. All employees, upon request by management and confirmed by the Chief Compliance Officer, must inform management of any private access codes, passwords, or other similar keys necessary to access Firm-Provided Technology and Firm Information. No employee may access, or attempt to obtain access to, another employee's Firm-Provided Technology without appropriate authorization from management and the Chief Compliance Officer.

Access to all Firm-Provided Technology is granted by the Firm as a privilege and is neither promised nor guaranteed as a necessary tool for the normal discharge of an employee's duties. Use of this privilege is subject to the discretion of the employee's supervisor or Firm management and may be revoked without notice at any time.

Any violation of the Firm's policy may result in disciplinary action, up to and including termination of employment.

The proper and appropriate use of Firm-Provided Technology is prudent business practice and should be well understood, and complied with, by all employees.



## EMPLOYEE VERIFICATION/ EMPLOYEE REFERENCE POLICY

It is the policy of the Firm to verify only dates of employment, job title and most recent compensation of an employee. All requests for verification of current or past employment must be directed to Human Capital. However, from time to time the Firm may be called upon to provide documentation or references to various agencies and organizations supporting a prospective or current employee's qualifications for a particular job or responsibility with the Firm (e.g., support of an application for a work visa or securities license). Any such supporting documentation shall in no way limit the right of the Firm to evaluate each employee's performance using additional performance criteria or standards or to terminate an employee's employment with the Firm at any time for any reason or for no reason, with or without notice. All reference requests must be in writing and directed to Human Capital.

## EMPLOYMENT RECORDS

Employees will be provided with access to and copies of personnel files to the extent required and in accordance with applicable state law.

All statements made by an employee on any employment record (e.g., application for employment, resumes, W-4 forms and notifications of change of address or telephone number(s)) must be true and accurate and must not omit any information requested. Falsification of any employment record may result in disciplinary action, up to and including termination of employment.

Any change in name, home address, telephone number(s), marital status, number of dependents, beneficiaries or notification instruction in case of an emergency must be submitted immediately to Human Capital in order to maintain the accuracy of the employee's personnel file and to ensure the proper coverage and administration of the Firm's benefits programs. The Firm is not responsible for any adverse consequences resulting from an employee's failure to maintain the accuracy of the information contained in the employee's personnel file.

## NON-SMOKING POLICY

In keeping with the Firm's intent to provide a safe and healthy work environment and pursuant to applicable law, the use of tobacco (including e-cigarettes) is not permitted anywhere on the Firm's premises, including private offices. Compliance with this policy is mandatory for all employees and persons visiting the Firm, with no exceptions. Failure to comply with this policy may lead to disciplinary action, up to and including termination of employment. Any disputes involving smoking and any employees with questions should discuss their issues/concerns with Human Capital. Employees will not be subject to retaliation for reporting violations of this policy in good faith.

## OUTSIDE EMPLOYMENT AND ACTIVITIES

Outside employment and activities (e.g., board or similar positions, political volunteering, business affiliations or investments) should be discussed with your manager and fully disclosed to avoid any actual or apparent conflict of interest. Pursuant to the Firm's Code of Ethics, many such activities also require pre-approval from the Compliance Department, unless such requirement is otherwise restricted by applicable law. Under no circumstances should an employee conduct outside employment business during the normal work hours.

No employee of the Firm may use the resources of the Firm to conduct any business or activity other than that of the Firm. The Firm's resources, including but not limited to Firm-Provided Technology, copiers, mailroom and other operating areas, may not be used in support of any outside business or activity. Similarly, the Firm's name, address and/or phone number may not be used to conduct business affairs other than those related to the Firm. Unless specifically authorized, no employee may represent that the employee is authorized to speak on behalf of the Firm.

## SOLICITATION AND DISTRIBUTION

To avoid distractions, solicitation by an employee of another employee is prohibited while either the person doing the soliciting or the person being solicited is on working time.

Distribution of advertising material, handbills, printed or written literature of any kind during working time or in working areas of the Firm is prohibited.

Working time includes the time during which any of the employees involved are actually scheduled to work, but does not include scheduled rest periods, meal breaks and other specified times when employees are not expected to be working.

Employees are also prohibited from engaging in solicitation and distribution to clients or working employees at any time in client service areas during the times client service is occurring in such areas.

## EXPENSE REIMBURSEMENT POLICY

It is the Firm's policy to reimburse employees for actual and reasonable expenses incurred in the conduct of Firm business. We rely on those submitting and approving expenses to exercise good judgment in determining whether such expenditures are appropriate and reasonable under the circumstances. Expenses submitted for reimbursement must be accompanied by sufficient explanatory information and documentation to provide satisfactory records to support the full amount and purpose of the expenditure. An expense report is to be completed for all travel, entertainment and other out-of-pocket business-related expenses. The expense report form is revised periodically; a new template should be retrieved from the Firm's intranet in order to ensure that the latest version is used. Please refer to the Expense Allocation, Submission and Reimbursement Policy available on the Firm's intranet for further guidance.

## STAFF MEALS

The Firm will pay for lunches ordered through [seamless.com](https://seamless.com) when employees are in town and work through their lunch period. The Firm pays for dinner ordered through [seamless.com](https://seamless.com) when employees work after 8:00 PM and have worked more than 10 consecutive hours within that day. The Firm expects each employee to exercise good judgment regarding the cost of the meal being ordered. Any expenses for meals purchased outside of [seamless.com](https://seamless.com) or any meals purchased offsite will not be reimbursed by the Firm.

## CAR SERVICES

The Firm maintains accounts with multiple New York City-based car services. Car service is to be used for business purposes only.

Staff may take a complimentary car service home after 8:00 PM if there is a business need requiring an employee to work in the office to this hour. Employees should use local taxi service rather than the car service if they live in the borough of Manhattan.

Reservations made for consultants are to be charged to their personal credit card. Reservations on behalf of a client, guest, or job candidate will be billed to the authorizing employee's American Express card/Staff ID number.

For additional information, please refer to the Office Services page on our intranet.

## SEPARATIONS

When an employee resigns from the Firm, we request that supervisors or Human Capital be notified at least two (2) weeks prior to the employee's departure. We appreciate employees' thoughtfulness in this matter. All Firm property and equipment must be returned at the time of separation or as otherwise required by the Firm.

# COMPENSATION AND OTHER PROGRAMS

## COMPENSATION REVIEWS

Compensation reviews are generally conducted at year-end and become effective on January 1 of the following year. Performance, attendance, punctuality and Firm profitability are some of the factors used to determine compensation increases. Periodic performance reviews may also be conducted throughout the year as appropriate and the results communicated to you.

## DISCRETIONARY BONUS

Salaried employees may be eligible for an annual discretionary bonus to the extent such bonuses are given by the Firm. Bonuses are not guaranteed unless otherwise agreed upon in writing and signed by both you and an expressly authorized representative of the Firm and approved by Human Capital. The decision as to whether to pay bonuses, and if so, the amounts of such bonuses, are within the Firm's sole discretion. Such decisions are based on a variety of factors, including, but not limited to, the Firm's performance and the employee's performance.

Unless otherwise required by applicable law, only those individuals who are actively employed at the time bonuses are paid are eligible to earn a bonus. Partial or pro-rata bonuses are not paid to those who separate from the Firm or who are notified of termination of employment before bonuses are paid, unless otherwise required by applicable law.

To the extent the Firm decides to award discretionary bonuses in any given year, Firm management determines the amount of such potential bonuses with input from, among others, your manager and Human Capital.

## OVERTIME

The Firm will make every effort to provide advance notice of the need to work additional hours, as overtime must be approved in writing in advance by the employee's manager for non-exempt employees. Non-exempt employees are eligible for overtime pay. Unless otherwise required by applicable law, overtime is time worked in excess of 40 hours per workweek, for which a nonexempt employee will be paid one and one-half times the employee's normal hourly rate. Working overtime that is not properly authorized may subject an employee to disciplinary action, up to and including termination of employment.

Lunch hours are treated as time worked for purposes of determining whether the overtime requirement has been met, regardless of whether or not an individual works through lunch. Subject to any additional requirements pursuant to applicable law, overtime pay is calculated based on weekly hours that must be taken into account under the Fair Labor Standards Act (FLSA) and/or applicable state law. Hourly rates for a non-exempt salaried employee are calculated by dividing the employee's annual salary by 2,080 hours (i.e. 40 hours each workweek for 52 weeks). Paid holidays, PTO, paid sick time, jury duty leave, bereavement and substantiated or unsubstantiated absences are not counted as hours worked in overtime pay calculations, unless required by applicable law.

## ADMINISTRATIVE PROCEDURE FOR RECORDING HOURS WORKED

All non-exempt employees must complete a weekly time sheet reflecting all regular and any overtime (if applicable) hours worked in a workweek. Hourly employees must record their time in and out for meal periods and record their time out promptly at the end of their shift. Non-exempt employees may never work off the clock.

The time sheet is available electronically on Workday. Your manager must approve your time sheet, and your signed time sheet should be sent to Human Capital. Time sheets are electronically submitted through Workday to ensure wages are paid in a timely manner. Since employee time records are vital for payroll purposes, employees must inform management if they fail or otherwise forget to record their time in or out before or after any working time. Failure to properly record time may result in discipline, up to and including termination of employment.

## SALARY BASIS POLICY FOR EXEMPT EMPLOYEES

It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws.

If you are classified as an exempt salaried employee, you will receive a salary which is intended to compensate you for all hours you may work for the Firm. 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 for variations in the quantity or quality of the work you perform.

Under federal and state law, your salary is subject to certain deductions. For example, absent contrary state law requirements, exempt salaried employees' salaries are subject to reduction for the following reasons: full day absences for personal reasons, sickness, or disability; full day disciplinary suspensions for infractions of our written policies and procedures; Family and Medical Leave absences (either full or partial day absences); to offset amounts received as payment for jury and witness fees or military pay; or the first or last week of employment in the event of less than a full week worked. Your salary may also be reduced for certain types of deductions such as your portion of health, dental or life insurance premiums; state, federal or local taxes, social security; or voluntary contributions to a 401(k).

In any workweek in which you performed any work, your salary will not be reduced for partial day absences for personal reasons, sickness or disability; absence due to the Firm's decision to close a facility on a scheduled work day; absences for jury duty, attendance as a witness, or military leave in any week in which any work is performed; or any other deductions prohibited by state or federal law. However, subject to state law, it is not an improper deduction to reduce exempt salaried employees' accrued PTO or other forms of paid time off for full or partial day absences for personal reasons, sickness, or disability.

We make every effort to ensure our employees are paid correctly. Occasionally, however, inadvertent mistakes can happen. When mistakes do happen and are called to our attention, we will promptly make any corrections necessary. Please review your pay stub when you receive it to make sure it is correct. If you believe a mistake has occurred or if you have any questions, please use the reporting procedure outlined in the Paycheck subsection listed below.

## PAYROLL LOCATION POLICY

Hybrid and Remote employees will remain an employee of the office they report to (New York, California, or Texas) to the maximum extent permitted by applicable law. Employees must live and work in the US to remain on US payroll and work in an approved state (reference list of approved states below).

The expectation and assumption by the firm is that the home location in which work is being performed on work-from-home days is in one of the following states/jurisdictions and is consistent with the state matching the home address on file with human capital in the Workday system: California, Colorado, Connecticut, Florida, Georgia, Illinois, New Jersey, New York, Oregon, Pennsylvania, South Carolina, Texas, Virginia, Washington, Washington, DC.

Employees must request prior approval to relocate to a state that is not one listed above as those are the only states in which we report employees. Requests should be directed to the Location Committee for consideration (Email: Adrienne Filipov, Shari Tepper, Sandra Wishnick)

States have varying and complex requirements concerning income tax withholding and reporting for nonresident employees performing services in a state. As such, the firm expects that on scheduled workdays all hybrid employees are either:

- Working in their assigned office location (NY, Houston, or San Francisco), or
- Working at their home (i.e., their home address in Workday), or
- Traveling for work as required
- While at the home location, the employee must be focused on work responsibilities during working hours as if they were in the office.

The firm will be responsible for complying with the standard income tax and other withholding obligations based on where the employee lives and works and has an obligation to withhold New York State income tax for New York nonresident employees that are primarily assigned to the New York office and are telecommuting from their home under New York's Convenience of the Employer Rule.

The Firm does not provide tax guidance, nor will it assume any additional tax liabilities on behalf of employees. It is the employee's responsibility to determine any income tax implications of maintaining a home office area and employees are encouraged to consult with a qualified tax professional to discuss personal income tax implications.

## PAYCHECK

Paychecks are issued semi-monthly on the 1st and the 15th of each month, unless otherwise required by applicable law. If the 1st or the 15th falls on a bank holiday or weekend, the payday will be the preceding business day. All employees will be paid by check or through direct deposit of funds to either a savings or checking account at their bank of choice. It may take a few pay periods before direct deposit takes effect. If an employee does not have direct deposit their paycheck will be distributed on the payday.

Detailed paycheck information is available to employees through Workday, a secured website that provides access to pay vouchers and W-2 statements online via the internet. Whether they are enrolled in direct deposit or receive a live check, employees will have access to view their payroll information online.

Payroll information includes itemized deductions made from gross earnings. The Firm is required by law to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also include any court-ordered garnishments. Payroll information also includes itemization of any voluntary deductions such as an employee's portion of health, dental, or life insurance premiums and/or voluntary contributions to a 401(k) or pension plan, to the extent applicable. Generally, any applicable overtime pay will be paid in arrears.

Employees who believe there is an error in their pay, have questions about deductions from their pay or believe they have been subject to any improper deductions, should immediately contact Human Capital. If you have not received a prompt and fully acceptable reply, you should immediately contact:

Lisa Ferraro  
Director, Human Capital  
450 Lexington Avenue  
New York, NY 10017  
Phone: 212-878-9257

If you are unsure of whom to contact or if you have not received a satisfactory response within five (5) business days after reporting the incident, please immediately contact:

Sandra Wishnick  
Director, Human Capital  
450 Lexington Avenue  
New York, NY 10017  
Phone: 212-878-9232

Every report will be fully investigated and corrective action will be taken where appropriate, up to and including termination of employment for any employee(s) who violates this policy. In addition, the Firm will not allow any form of retaliation against individuals who report alleged violations of this policy or who cooperate in the Firm's investigation of such reports. Retaliation is unacceptable, and any form of retaliation in violation of this policy will result in disciplinary action, up to and including termination of employment.

# TIME OFF BENEFITS

## 2023 U.S. FIRM HOLIDAY SCHEDULE

All salaried full-time and salaried part-time employees will be entitled to paid holidays. The Firm generally designates as a holiday any day on which the New York Stock Exchange is closed. We customarily observe the following holidays:

|                       |                                      |
|-----------------------|--------------------------------------|
| January 2             | New Year's Day observed              |
| January 16            | Martin Luther King, Jr. Day          |
| February 20           | Presidents' Day                      |
| April 7               | Good Friday                          |
| May 29                | Memorial Day                         |
| June 19               | Juneteenth National Independence Day |
| July 3 (2023 Only)    | Extra Independence Day Holiday       |
| July 4                | Independence Day                     |
| August 28-September 1 | Summer Closure Week                  |
| September 4           | Labor Day                            |
| November 23           | Thanksgiving Day                     |
| November 24           | Day after Thanksgiving               |
| December 25           | Christmas Day                        |
| December 26-29        | December Holiday Closure Week        |
| Jan 1 (2024)          | New Year's Day (2024 Holiday)        |

Salaried full-time employees and salaried part-time employees will be eligible for a paid holiday if the holiday happens to fall on their regular workday. Eligible employees will receive one (1) day's pay at their regular straight time rate. Non-exempt full-time salaried and part-time salaried employees who are called in to work on a holiday will receive one (1) day's pay at their regular straight-time rate, and an additional payment of straight-time for the actual time they work that day or allowed to take the holiday at a later date within the same year. This is at the manager's discretion. Paid holidays off are not counted as hours worked for purposes of calculating overtime.

## PAID TIME OFF

Paid time off (PTO) is a bank of accrued time that may be used, in the employee's discretion, for such purposes as vacation, personal days, floating holidays and religious holidays not observed by the Firm. All full-time salaried and part-time salaried employees are eligible for PTO in accordance with the following policy. Although employees accrue PTO during their first 90 days, they may not take PTO during this period unless approved by their manager and Human Capital. Employees must track their PTO in Workday or by an alternate method as agreed upon with their manager.

### ACCRUAL

Employees accrue PTO for each calendar month they are paid by Warburg Pincus. PTO accrues based on the chart below. During the first calendar year in which employment commences, PTO is pro-rated based on the month of hire. Increases in PTO accrual rate are based upon the month of hire and do not begin until the calendar month that commences following the employee's sixth or eleventh year of service. PTO does not accrue during a leave of absence unless otherwise required by applicable law.

### U.S. PERSONAL TIME OFF (PTO) AND FIRM HOLIDAY SCHEDULE

| Years of Service | Annual PTO Accrual In Hours | Annual Accrual In Days | Rate of Accrual In Hours (Per Month)* | Firm Holidays In Days for 2023** | Total Annual PTO & Holidays In Days |
|------------------|-----------------------------|------------------------|---------------------------------------|----------------------------------|-------------------------------------|
| 1–5 Years        | 80                          | 10                     | 6.67 hours                            | 21                               | 31                                  |
| 6–10 Years       | 120                         | 15                     | 10 hours                              | 21                               | 36                                  |
| 11+ Years        | 160                         | 20                     | 13.34 hours                           | 21                               | 41                                  |

\* Please note: over a half-month worked, the whole month is counted; under a half-month worked, the month is not counted.

\*\* Please refer to the 2023 Holiday Schedule; extra holiday in July 2023 only

### PART-TIME PRO-RATED PTO

Part-time salaried employees are entitled to accrue pro-rated PTO based on the hours they are regularly scheduled to work per workweek in accordance with the following formula:

$$\begin{array}{l} \text{PTO Days for} \\ \text{Full-Time} \\ \text{Salaried Employees} \end{array} \times \begin{array}{l} \text{Number of Hours Regularly} \\ \text{Scheduled to Work Per} \\ \text{Workweek} \div 40 \end{array} = \begin{array}{l} \text{Maximum Annual} \\ \text{Pro-rated PTO Accrual} \end{array}$$

### PTO SCHEDULING AND APPROVAL

Requesting PTO should be done with as much advance notice as possible. Employees may use PTO at a minimum of half day increments, provided that this is reasonable under the circumstances. PTO must be approved in advance by your manager with consideration given to department workload. The needs of Warburg Pincus will be the determining factor where conflict occurs.

## PAYMENT AND PAYOUT

Warburg Pincus encourages employees to take their PTO. Under special circumstances when employees are unable to use accrued PTO due to workloads and subject to their manager's approval, employees may generally carry over up to five (5) PTO days into the next calendar year, unless otherwise required by applicable law.

Unused PTO is calculated according to this formula:

$$\begin{array}{l} \text{Accrued PTO (for current} \\ \text{year, including approved} \\ \text{carry-over from prior year)} \end{array} - \begin{array}{l} \text{PTO taken in} \\ \text{current calendar year} \end{array} = \begin{array}{l} \text{Unused} \\ \text{PTO} \end{array}$$

Please note: over a half-month worked, the whole month is counted; under a half month worked, the month is not counted. PTO does not accrue during periods of short term disability or unpaid leaves of absence regardless of whether such periods of disability or unpaid leaves of absence are subject to the family and medical leave act.

PTO is paid at the employee's base rate of pay at the time of absence for the number of hours the employee otherwise would have worked that day. PTO is not counted as hours worked for purposes of calculating overtime. Employees resigning from the Firm who have accrued unused PTO for the current calendar year (including any carry-over days from the prior year) will forfeit this time and it will not be paid at separation. If your PTO taken at the time of separation exceeds the PTO you have accrued at the time of separation, you may be required to reimburse Warburg Pincus for PTO advanced, in accordance with applicable law.

## PAID SICK AND SAFE TIME

### ELIGIBILITY AND ACCRUAL

All employees are eligible for paid sick time. All salaried employees will be provided with fifty-six (56) hours (California Employees, refer to the California Supplement) of paid sick time at the time of hire and at the start of each calendar year. All hourly employees will accrue one (1) hour of paid sick time for every thirty (30) hours worked and accrual is capped at fifty-six (56) hours for the calendar year. For purposes of this policy, the calendar year is the twelve (12) month period beginning January 1st and ending December 31st.

### USAGE

Salaried employees may begin using accrued paid sick time as of the start of employment, or for hourly employees immediately upon accrual. Unless otherwise required by applicable law, paid sick time may be used in a minimum increment of 4 hours, provided this is reasonable under the circumstances. An employee may not use more than fifty-six (56) hours of paid sick time in any calendar year, unless otherwise required by applicable law. Employees must track the use of paid sick time in Workday or by an alternate method as agreed upon with their manager. Employees may use paid sick and safe time for absences due to:

1. The employee's mental or physical illness, injury or health condition or need for medical diagnosis, care or treatment of a mental or physical illness, injury or health condition or need for preventive medical care;



2. The care of the employee's family member who needs medical diagnosis, care or treatment of a mental or physical illness, injury or health condition or who needs preventive medical care;
3. Closure of the employee's place of business by order of a public official due to a public health emergency or such employee's need to care for a child whose school or childcare provider has been closed by order of a public official due to a public health emergency; or
4. The employee or a family member of the employee being the victim of domestic violence, family offense matters, sexual offenses, stalking, or human trafficking:
  - a) To obtain services from a domestic violence shelter, rape crisis center, or other shelter or services program for relief from domestic violence, a family offense matter, sexual offense, stalking, or human trafficking;
  - b) To participate in safety planning, temporarily relocate, or take other actions to increase the safety of the employee or employee's family members from future domestic violence, family offense matters, sexual offenses, stalking, or human trafficking;
  - c) To meet with a civil attorney or other social service provider to obtain information and advice on, and prepare for or participate in any criminal or civil proceeding, including but not limited to, matters related to domestic violence, a family offense matter, sexual offense, stalking, human trafficking, custody, visitation, matrimonial issues, orders of protection, immigration, housing, discrimination in employment, housing or consumer credit;
  - d) To file a complaint or domestic incident report with law enforcement;
  - e) To meet with a district attorney's office;
  - f) To enroll children in a new school; or
  - g) To take other actions necessary to maintain, improve, or restore the physical, psychological, or economic health or safety of the employee or employee's family member or to protect those who associate or work with the employee.

For purposes of this policy, family member means a child (biological, adopted, or foster child, a legal ward, or a child of an employee standing in loco parentis), spouse, domestic partner, parent (biological, foster, step, adoptive, legal guardian, or person who currently stands in loco parentis to another person or stood in loco parentis when an employee was a minor child), sibling (including half siblings, step siblings, or siblings related through adoption), grandchild, or grandparent, or the child or parent of the employee's spouse or domestic partner, any other individual related by blood to the employee, and any other individual whose close association with the employee is the equivalent of a family relationship.

An employee's use of safe/sick time will not be conditioned upon searching for or finding a replacement worker.

Employees will be advised of the amount of safe/sick time accrued and used during a pay period and total balance of accrued safe/sick time through the employee's Workday Online account or other form of written documentation provided each pay period.

To the extent an employee's need for time off is covered by one of the reasons set forth above, employees must use paid sick time available pursuant to this policy before using

any available PTO. In instances where available paid sick time has been exhausted, employees may use any available PTO. If all paid sick time and PTO has been exhausted, time off will be unpaid, unless otherwise required by applicable law. In cases of FMLA intermittent leave, the deductions from an exempt employee's salary will be consistent with the FMLA's requirements. Employees who believe deductions have been made from their salary because of absences due to illness or injury and which are inconsistent with this policy should immediately follow the steps outlined in the Paycheck subsection of Compensation & Other Programs.

Employees must make requests to use paid safe/sick time orally or in writing. Additionally, the Firm requires an employee to provide written confirmation that they are using paid sick time in accordance with this policy. Written confirmation should be provided to the employee's manager.

The Company may require supporting documentation if the employee uses accrued paid safe/ sick time for more than three (3) consecutive work days, to the maximum extent permitted by applicable law.

The Firm may take disciplinary action, up to and including termination of employment, against an employee who uses paid sick time provided under this policy for purposes other than those described above, to the maximum extent permitted by applicable law. Indications of abuse of sick time may include, but are not limited to, a pattern of: (1) use of unscheduled sick time on or adjacent to weekends, regularly scheduled days off, holidays, vacation or pay day, (2) taking scheduled sick time on days when other leave has been denied, or (3) taking sick time on days when the employee is scheduled to work a shift or perform duties perceived as undesirable.

## **PAYMENT**

Paid sick time will be paid at the same rate as the employee earns from the employee's employment at the time the employee uses such time, but no less than the applicable minimum wage. Use of paid sick time is not considered hours worked for purposes of calculating overtime.

## **CARRYOVER AND PAYOUT**

Salaried employees may not carry over from year to year accrued, unused paid sick time, unless otherwise required by applicable law. Hourly employees may carry over accrued, unused paid sick time from year to year. The maximum amount that can be carried over is fifty-six (56) hours. Accrued but unused paid sick time cannot be paid out at the end of the year rather than carried over. Accrued but unused paid sick time under this policy will not be paid at separation.

# LEAVES OF ABSENCE

## JURY DUTY LEAVE

The Firm realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees are allowed time off to perform such civic service as required by applicable law. Upon receipt of a jury duty notice, employees should immediately advise both Human Capital and their manager and provide a copy of the summons to Human Capital. Your manager also should be informed of the expected length of jury duty service. In the event business needs make it necessary to request a postponement, the Firm may request that employees attempt to do so. If, during the time an employee has been selected to serve, the jury is not in session or is dismissed, the employee must report to work. You should copy and provide to Human Capital a “completed jury service notice” on your first day back to the office. The notice will be retained in your personnel file.

Time off with full salary pay is granted to full-time salaried employees serving on jury duty. If a part-time salaried employee serves on jury duty, the Firm will pay the employee during the time period served for the hours the employee would have been regularly scheduled to work during such period. If an hourly employee serves on jury duty, the employee will be paid in accordance with applicable law, however, exempt employees are paid their full salary for any week in which they perform authorized work for the Firm.

## PARENTAL LEAVE

The Parental Leave Policy (the “Parental Leave Policy”) is for U.S. employees and provides pay during a period of leave pursuant to Firm policy and/or applicable law in order to care for, and bond with, the employee’s new son or daughter following birth, adoption or permanent foster care placement. The Parental Leave Policy provides paid leave to both new primary and secondary caregivers. Primary caregivers are eligible for up to 20 weeks of paid leave and secondary caregivers are eligible for up to 4 weeks of paid leave. You can review additional details about the Parental Leave Policy such as eligibility and coordination with other laws and benefits in the Warburg Pincus Benefits Program Book.

## VOTING LEAVE

Unless otherwise required by applicable law, employees who provide at least two days notice are entitled to up to 2 hours of paid time to vote, unless “sufficient time” exists during nonworking hours; 4 consecutive nonworking hours while polls are open is “sufficient.” Time off should be at the beginning or end of working shift, as the Firm may designate, unless otherwise mutually agreed.

## MILITARY SPOUSE LEAVE

Employees who are generally scheduled to work an average of 20 or more hours per week may be eligible to receive up to ten (10) days of unpaid leave during a period when the employee’s spouse, who is an active duty member of the Armed Forces, is on leave from

deployment. In order for the employee to qualify for the leave, the employee's spouse must be a member of the Armed Forces of the United States (including the National Guard or Reserves) who is on leave from deployment to a combat zone during a period of military conflict.

In order to qualify, employees must provide the Firm with notice of their intention to take the leave no later than two business days after receiving an official notice that their spouse will be on leave from deployment, as well as written documentation certifying that their spouse will be on leave from deployment. The above-described leave does not qualify as leave under the Family and Medical Leave Act.

For more detailed information regarding the rights and obligations of employees and the Firm regarding military service, please contact Human Capital.

## BONE MARROW DONATION LEAVE

Employees will be granted an unpaid leave of absence if they seek to donate bone marrow. The total length of the leave for each employee will be determined by the physician, but may not be longer than forty work hours, unless otherwise required by applicable law. An employee who seeks leave under this section must provide a physician's verification. Warburg Pincus will not retaliate against an employee for requesting or taking bone marrow donation leave.

## FAMILY AND MEDICAL LEAVE ACT (FMLA)

### ELIGIBILITY REQUIREMENTS

Employees are eligible for FMLA if:

- At least fifty (50) or more employees are employed within a 75-mile radius of the employee's work site;
- The employee has been employed for at least one year; and
- The employee has worked at least 1,250 hours<sup>1</sup> within the previous twelve (12) months.

### BASIC LEAVE ENTITLEMENT

The FMLA requires covered employers to provide up to twelve (12) weeks of unpaid, job-protected leave in a 12-month period to eligible employees for certain family and medical reasons. The 12-month period is determined on a "rolling" 12-month period dating back from the time the employee requests leave. Leave may be taken for any one, or for a combination, of the following reasons:

- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son or daughter, or parent (but not in-law) who has a serious health condition; and/or

- For the employee's own serious health condition (including any period of incapacity due to pregnancy, prenatal medical care or childbirth) that makes the employee unable to perform one or more of the essential functions of the employee's job.

Leave to care for the employee's child after birth, or placement for adoption or foster care must be taken within one (1) year of the child's birth or placement.

### MILITARY FAMILY LEAVE

Eligible employees with a spouse, son, daughter, or parent (but not in-law) on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty) in the Reserve component of the Armed Forces for deployment to a foreign country in support of a contingency operation or Regular Armed Forces for deployment to a foreign country may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, caring for the parents of the military member on covered active duty and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement which permits eligible employees (spouse, son, daughter, parent (but not in-law) or next of kin of a covered service member) to take up to twenty-six (26) weeks of leave to care for a covered service member with a serious injury or illness during a single 12-month period (one time basis only). A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is on the temporary retired list, for a serious injury or illness. These individuals are referred to in this policy as "current members of the Armed Forces." Covered service members also includes a veteran who is discharged or released from military services under condition other than dishonorable at any time during the five year period preceding the date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation or therapy for a serious injury or illness. These individuals are referred to in this policy as "covered veterans."

The FMLA definitions of a "serious injury or illness" for current Armed Forces members and covered veterans are distinct from the FMLA definition of "serious health condition" applicable to FMLA leave to care for a covered family member.

### JOB BENEFITS AND PROTECTION

If applicable, during FMLA leave, the Firm must maintain health coverage under any "group health plan" on the same terms as if the employee had continued to work. If paid time off is substituted for unpaid leave, the Firm will deduct the employee's portion of any applicable health plan premium as a regular payroll deduction. If the employee's leave is unpaid, the employee must make arrangements with Human Capital prior to taking leave to pay their portion of any applicable health insurance premiums each month.

The Firm's obligation to maintain health care coverage ceases if an employee's premium payment is more than 30 days late. If an employee's payment is more than 15 days late, the Firm will send a letter notifying the employee that coverage will be dropped on a specified

<sup>1</sup>Per Department of Labor guidance the following must be noted in company firm guidelines: special hours of service requirements apply to airline flight crew employees.

date unless the co-payment is received before that date. If employees do not return to work at the end of the leave period (unless employees cannot return to work because of a serious health condition or other circumstances beyond their control), they will be required to reimburse the Firm for the cost of the premiums the Firm paid for maintaining coverage during their unpaid FMLA leave.

For purposes of this paragraph, an employee will be considered to have returned to work if the employee returns to work for at least 30 calendar days, or if the employee retires at the end of the FMLA leave period or within 30 days thereafter.

Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

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

#### **DEFINITION OF SERIOUS HEALTH CONDITION**

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

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

#### **USE OF LEAVE**

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the Firm's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

#### **SUBSTITUTION OF PAID LEAVE FOR UNPAID LEAVE**

Employees have the option to use accrued PTO and paid sick time while on unpaid FMLA leave. The substitution of paid time for unpaid FMLA leave time does not extend the length of FMLA leaves and the paid time will run concurrently with an employee's FMLA entitlement. Receipt of disability benefits, Workers' Compensation benefits or other monetary benefits such as Paid Family Leave Benefits does not extend the maximum amount of leave time to which an employee is eligible under the FMLA.

#### **EMPLOYEE RESPONSIBILITIES**

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

Employees must provide sufficient information for the Firm to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions; the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave.

Employees also must inform the Firm if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees may also be required to provide medical certification and periodic recertification supporting the need for leave.

#### **EMPLOYER RESPONSIBILITIES**

Covered employers must inform employees requesting leave whether they are eligible under the FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for ineligibility.

Covered employers must inform employees if leave is designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

#### **UNLAWFUL ACTS BY EMPLOYERS**

FMLA makes it unlawful for the Firm to interfere with, restrain, or deny the exercise of any right provided under the FMLA; or discharge or discriminate against any person for opposing any practice made unlawful by the FMLA or for involvement in any proceeding under or relating to the FMLA. Concerns regarding a possible violation with respect to either of these obligations should be reported to the Firm's Human Capital Department.

#### **ENFORCEMENT**

Employees may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer. FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement, which provides greater family or medical leave rights.

# CALIFORNIA SUPPLEMENT

## PAID FAMILY LEAVE BENEFITS

An employee who is off work to care for a child, spouse, parent, registered domestic partner, Grandparent, grandchild, sibling, or parent-in-law with a serious health condition, or to bond with a minor child within the first year of the child's birth or placement in connection with foster care or adoption or to participate in a qualifying exigency related to the covered active duty or call to covered active duty of the employee's spouse, domestic partner, child or parent in the Armed Forces of the United States may be eligible to receive benefits through the California "Paid Family Leave" ("PFL") program, which is administered by the Employment Development Department ("EDD").

These benefits are financed solely through employee contributions to the PFL program. That program is solely responsible for determining if an employee is eligible for such benefits.

Employees who need to take time off work to care for a child, spouse, parent, registered domestic partner, grandparent, grandchild, sibling, or parent-in-law with a serious health condition or to bond with a new child may contact Human Capital for information about the EDD's PFL program and how to apply for benefits. Employees also may contact their local EDD office for further information. Employees should maintain regular contact with their manager while absent from work so we may monitor employees' return-to-work status. In addition, employees should contact Human Capital when ready to return to work so we may determine what positions, if any, are open. When an employee applies for PFL benefits, Human Capital will determine if the employee has any accrued but unused PTO, other than paid sick time, available.

Employees taking time off work to care for a child, spouse, parent, registered domestic partner, grandparent, grandchild, sibling, or parent-in-law with a serious health condition or to bond with a new child are not guaranteed job reinstatement unless they qualify for such reinstatement under federal or California family and medical leave laws. Any time off for Paid Family Leave purposes will run concurrently with other leaves of absence, such as Family and Medical Leave/California Family Rights Act Leave, if applicable. Please see the "Family and Medical Leave/California Family Rights Act" policies for eligibility requirements.

## PREGNANCY DISABILITY LEAVE

Employees who are disabled by pregnancy, childbirth or related medical conditions are eligible to take a pregnancy disability leave ("PDL"). If affected by pregnancy or a related medical condition, employees also are eligible to transfer to a less strenuous or hazardous position or to less strenuous or hazardous duties, if such a transfer is medically advisable and can be reasonably accommodated. Employees disabled by qualifying conditions may also be entitled to other reasonable accommodations where doing so is medically necessary. In addition, if it is medically advisable to take intermittent leave or work a reduced leave schedule, the Firm may require a temporary transfer to an alternative position with equivalent pay and benefits that can better accommodate recurring periods of leave.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## REASONS FOR LEAVE

PDL is for any period(s) of actual disability caused by the employee's pregnancy, childbirth, or related medical condition. Time off needed for prenatal or postnatal care; severe morning sickness; doctor-ordered bed rest; gestational diabetes; pregnancy-induced hypertension; preeclampsia; childbirth; postpartum depression; loss or end of pregnancy; or recovery from childbirth or loss or end of pregnancy are all covered by this PDL policy.

## DURATION OF LEAVE

An employee is entitled to up to four (4) months of PDL, per pregnancy, while disabled by pregnancy, childbirth or a related medical condition. PDL does not need to be taken in one continuous period of time, but can be taken on an intermittent basis pursuant to the law. For purposes of this policy, "four months" means time off for the number of days the employee would normally work within the four calendar months (one-third of a year, or 17.3 weeks or 122 days) following the commencement date of taking a pregnancy disability leave. For a full time employee who works five (5) 8-hour days per week (forty hours per week), "four months" means 88 working and/or paid 8-hour days (693 hours of leave entitlement), based on an average of 22 working days per month for 17.3 weeks in four months times forty hours per week. Employees working a part-time schedule will have their PDL calculated on a pro-rata basis.

## EMPLOYEE NOTICE REQUIREMENTS

To receive a reasonable accommodation, obtain a transfer, or take a PDL, employees must provide sufficient notice so the Firm can make appropriate plans – thirty (30) days advance notice if the need for the reasonable accommodation, transfer or PDL is foreseeable, or as soon as practicable if the need is an emergency or unforeseeable.

## MEDICAL CERTIFICATION

Employees are required to obtain a certification from their health care provider regarding their need for pregnancy disability leave or the medical advisability of an accommodation or a transfer. The certification should include:

1. The onset date of the employee's disability due to pregnancy or the date of the medical advisability of a transfer or accommodation;
2. The probable duration of the period(s) of disability or the period(s) for the advisability of a transfer or accommodation; and
3. A statement that, (i) due to the disability, an employee is either unable to work at all or to perform any one or more of the essential functions of her position without undue risk to herself or to other persons, or (ii) due to her pregnancy, a transfer to a less strenuous or hazardous position or duties is medically advisable.

Upon request, Human Capital will provide a medical certification form that can be taken to a health care professional. As a condition of returning from PDL, employees must obtain a release to return to work from a health care provider stating that they are able to resume their original job duties with or without a reasonable accommodation.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## LEAVE IS UNPAID

PDL is unpaid by the Firm, but employees may use accrued paid time off as part of PDL before taking the remainder of leave on an unpaid basis. We require, however, the use of any available paid sick time during PDL. The use of any paid leave will not extend the duration of PDL.

We encourage employees to contact the EDD regarding eligibility for state disability insurance for the unpaid portion of leave.

## LEAVE CONCURRENT WITH FAMILY AND MEDICAL LEAVE

For employees who are eligible for leave under the federal Family and Medical Leave Act, PDL will also be designated as time off under the Family and Medical Leave Act. Please refer to the "Family and Medical Leave" policy in this Guidelines for additional information.

## CONTINUATION OF HEALTH INSURANCE BENEFITS

Employees who participate in the Firm's group health insurance plan will continue to participate in the plan while on PDL under the same terms and conditions as if they were working. Employees should make arrangements with Human Capital for payment of their share of the insurance premiums.

## RETURN TO WORK

Employees who do not return to work on the originally scheduled return date or request in advance an extension of the agreed upon leave with appropriate medical documentation may be deemed to have voluntarily terminated employment with the Firm. Failure to notify the Firm of (1) the ability to return to work when it occurs or (2) continued absence from work because leave must extend beyond the maximum time allowed may be deemed a voluntary termination of employment with the Firm, unless you are entitled to Family and Medical Leave. Upon returning from PDL, employees will be reinstated to their same position, in most instances.

Taking PDL may impact certain of your benefits and your seniority date. For more information regarding eligibility for a leave and the impact of the leave on seniority and benefits, please contact Human Capital.

## REQUEST FOR ADDITIONAL TIME OFF

Any request for leave after a disability has ended will be treated as a request for Family and Medical Leave under the California Family Rights Act and/or the federal Family and Medical Leave Act, if eligible for such leave. Please refer to the "Family and Medical Leave" policy in the Guidelines for additional information. Employees who are not eligible for leave under the CFRA and/or FMLA will have a request for additional leave treated as a request for disability accommodation.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.



## FAMILY AND MEDICAL LEAVE/CALIFORNIA FAMILY RIGHTS ACT (*Addendum to FMLA Policy*)

Like the Family and Medical Leave Act (“FMLA”) Policy described elsewhere in this Handbook, the California Family Rights Act of 1993 (“CFRA”) may require employers to provide family and medical leaves of absence to eligible employees. Either or both of these laws may apply to a leave. Additionally, employees who are CFRA-eligible have certain rights to take both a pregnancy disability leave (“PDL”) and CFRA leave for the birth of a child. There are some differences between FMLA, CFRA, and PDL, and this Policy Addendum explains how such leaves are administered for California employees. Where more than one of the laws applies, leave taken may be counted under more than one law at the same time, to the extent permitted by the applicable law(s). For example, where pregnancy disability leave is also FMLA-qualifying, the leave will count against both FMLA and PDL entitlements. However, PDL is separate from and does not count against an employee’s CFRA leave entitlement.

This policy will be interpreted to comply with the law(s) that apply to a particular leave. If employees have any questions concerning CFRA leave, they should contact Ashley Winslow, Generalist, Human Capital.

### ELIGIBILITY

Under the CFRA, employees may have a right to an unpaid family care or medical leave (CFRA leave) if they:

1. Have worked for the Company for a total of at least twelve (12) months at any time prior to the commencement of a CFRA leave;
2. Worked for the Company for at least 1,250 hours in the 12-month period before the date they want to begin CFRA leave, to the extent permitted by applicable law; and
3. Work for an employer that employs five (5) or more employees.

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

An employee who is not eligible for CFRA leave at the start of a leave because the employee has not met the 12-month length of service requirement can meet this requirement while on leave because leave to which the employee is otherwise entitled counts toward length of service requirement (but not the 1,250 hours requirement).

### BASIC FAMILY AND MEDICAL LEAVE ENTITLEMENT

FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. CFRA leave may be up to twelve (12) workweeks in a 12-month period, and can be used for the birth, adoption, or foster care placement of a child; or the employee’s own serious health condition (except that leave for an employee’s disability due to pregnancy, childbirth or related medical condition does not count toward CFRA entitlement) or that of a child, parent, grandparent, grandchild, sibling, spouse, or domestic partner or designated person (except that leave to care for an employee’s parent-in-law, grandparent, grandchild, sibling, or registered domestic partner

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or designated person does not count towards FMLA leave). Employees who are CFRA-eligible have certain rights to take both a pregnancy disability leave (“PDL”) and a CFRA leave for reason of the birth of a child.

For purposes of CFRA leave, “child” means a biological, adopted, or foster child, a stepchild, a legal ward, a child of a domestic partner, or a person to whom the employee stands in loco parentis. “Grandchild” means a child of the employee’s child. “Grandparent” means a parent of the employee’s parent. “Parent” means a biological, foster, or adoptive parent, parent-in-law, a stepparent, a legal guardian, or other person who stood in loco parentis to the employee when the employee was a child. “Designated person” means any individual related by blood or whose association with the employee is the equivalent of a family relationship. The designated person may be identified by the employee at the time the employee requests the leave but an employee is limited to one designated person per 12-month period for family care and medical leave.

### DEFINITION OF SERIOUS HEALTH CONDITION

Under the FMLA and CFRA, a serious health condition is an illness, injury (including, but not limited to, on-the-job injuries), impairment, or physical or mental condition that involves either inpatient care or continuing treatment, including but not limited to, treatment for substance abuse. Unlike the FMLA, “inpatient care” under the CFRA is more broadly defined, and means a stay in a hospital, hospice, or residential health care facility, any subsequent treatment in connection with inpatient care, or any period of incapacity. A person will be considered an “inpatient” when a health care facility formally admits the person to the facility with the expectation that the employee will remain at least overnight and occupy a bed, even if it later develops that such person can be discharged or transferred to another facility and does not actually remain overnight.

### MILITARY EXIGENCY LEAVE

In addition to military exigency covered under the FMLA, CFRA is also available because of a qualifying exigency related to the covered active duty or call to covered active duty of an employee’s domestic partner.

### BONDING LEAVE

Employees may take intermittent leave for bonding with a child following birth or placement for adoption or foster care. Birth bonding leave must be taken within one (1) year after the child’s birth or placement. Intermittent leave for bonding purposes generally must be taken in 2-week increments, but the Company permits two occasions where the leave may be for less than two (2) weeks. Bonding leave is in addition to any time off taken for pregnancy disability leave.

### EMPLOYEE RESPONSIBILITIES

If possible, employees must provide at least thirty (30) days advance notice for foreseeable events (such as: the expected birth of a child, employees’ own planned medical treatments, or a family member’s planned medical treatment). For unforeseeable events, the Company requires that employees provide notice, at least verbally, as soon as they learn of the need for leave. Failure to comply with these notice rules is grounds for, and may result in, deferral of the requested leave until compliance with this notice policy is achieved.

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We may require certification from a health care provider before allowing leave to be taken for (1) an employee's pregnancy disability or a serious health condition or (2) a child, parent, grandparent, grandchild, sibling, spouse, or registered domestic partner or designated person who has a serious health condition. When medically necessary, leave may be taken on an intermittent or reduced work schedule.

We will require second or third certifications from health care providers only in the event the Company has reason to doubt the initial certification of an employee's need for leave due to the employee's own serious health condition. Recertification of the need for leave due to an employee's or family member's serious health condition will be requested only when the original certification has expired.

**BENEFITS**

Taking CFRA leave or PDL may impact certain benefits and seniority date. More information regarding eligibility for a leave and/or the impact of the leave on seniority and benefits can be obtained by contacting Ashley Winslow, Generalist, Human Capital.

**RETURNING TO WORK**

The CFRA contains a guarantee of reinstatement to the same or to a comparable position at the end of the leave, subject to any defense allowed under the law. There is no key employee exception under the CFRA. The PDL contains a guarantee of reinstatement to the same position in most instances, subject to defenses under the law. If an employee's anticipated return to work date changes and it becomes necessary for the employee to take more or less leave than originally anticipated, the employee must provide the Company with reasonable notice (i.e., within 2 business days) of the employee's changed circumstances and new return to work date. If employees give the Company unequivocal notice of their intent not to return to work, they will be considered to have voluntarily resigned and the Company's obligation to maintain health benefits (subject to COBRA requirements) and to restore their positions will cease.

**SAN FRANCISCO PAID PARENTAL LEAVE BENEFITS**

In accordance with the San Francisco Paid Parental Leave Ordinance, the Company provides partial wage replacement benefits ("Supplemental Compensation") to eligible employees who are on an approved leave of absence to bond with a new child through birth, adoption, or foster care placement. Eligible employees may receive up to eight (8) weeks of Supplemental Compensation in a 12-month period.

**ELIGIBLE EMPLOYEES**

To be eligible to receive benefits under this policy, an employee must meet all of the following criteria:

- 1. Be absent from work due to an approved leave of absence for the purpose of bonding with a new child during the first year after birth of the child or placement of the child with the employee through foster care or adoption;

- 2. Have worked at least 180 calendar days for the Firm before beginning any parental leave;
- 3. Perform at least eight (8) hours of work per week for the Firm within the geographic boundaries of the City and County of San Francisco;
- 4. Perform at least 40% of their total weekly hours within the geographic boundaries of the City and County of San Francisco;
- 5. Be receiving wage replacement benefits from the State of California's Paid Family Leave ("PFL") program for the purpose of bonding with a new child;
- 6. Comply with the procedures for requesting Supplemental Compensation benefits described below.

Employees who do not meet all of the above criteria are not eligible to receive Supplemental Compensation under this policy, but may still be eligible for benefits in accordance with the State of California PFL program.

**SUPPLEMENTAL COMPENSATION BENEFIT**

The weekly Supplemental Compensation benefit is calculated based on an employee's wages and will be calculated in accordance with the San Francisco Paid Parental Leave Ordinance. Unless otherwise provided by law, the Firm will provide eligible employees with a weekly Supplemental Compensation benefit that is equal to the difference between the weekly benefit received from the State PFL program and the employee's regular weekly wage, except that in no event will the total of the employee's PFL payments and Supplemental Compensation payments exceed the statutory cap. Supplemental Compensation is only available during the period the employee is eligible for and is receiving weekly PFL benefits for the purpose of bonding with a new child. Employees can receive up to eight (8) weeks of Supplemental Compensation benefits.

**PROCEDURE FOR RECEIVING SUPPLEMENTAL COMPENSATION**

In order to receive Supplemental Compensation, an employee must comply with the following procedures:

- 1. Provide the Firm with a copy of the employee's Notice of Computation of California Paid Family Leave Benefits ("Notice") from California's Employment Development Department (EDD) and provide EDD with permission to share the employee's California PFL weekly benefit amount with the Firm;
- 2. Complete and sign the San Francisco Paid Parental Leave Employee Form ("PPL Form"). The Notice and PPL Form must be submitted within a reasonable time following the Covered Employee's receipt of the Notice from EDD;
- 3. Notify the Firm in writing when the employee receives the first payment from EDD;
- 4. Submit a copy of the Notice of Payment from EDD to confirm the Covered Employee's receipt of PFL benefits.

Employees who do not fully comply with this procedure may be denied Supplemental Compensation benefits, or receipt of these benefits may be delayed. If an employee completes the above procedures for receiving Supplemental Compensation prior to or

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during the period in which the employee is also receiving PFL benefits, the Firm will make a good faith effort to make the first Supplemental Compensation benefit payment on the payday associated with the next full pay period following an employee's satisfaction of the above procedures. If an employee completes the above procedures after the period in which the employee received PFL benefits has been completed, the employee will receive the total Supplemental Compensation no later than thirty (30) days after satisfaction of the above procedures.

Employees may be required to reimburse the Firm for any Supplemental Compensation benefits provided under this policy if they: (1) do not return to work from a leave of absence during which they received Supplemental Compensation benefits, or (2) voluntarily resign from employment within ninety (90) days of the end of any leave during which they received Supplemental Compensation benefits.

Employees with questions regarding this benefit can contact Human Capital.

## SAN FRANCISCO LACTATION ACCOMMODATION

The Firm supports the legal right and necessity of employees who choose to express milk in the workplace. This policy is to establish guidelines for promoting a breastfeeding-friendly work environment and supporting lactating employees at the Firm for as long as they desire to express breastmilk.

The Firm will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's infant child, to the extent required by and in accordance with applicable local, state, and federal law. If possible, the break time must run concurrently with rest and meal periods already provided to the employee. Break time that cannot run concurrently with rest and meal periods already provided to the employee may be unpaid, to the extent permitted by applicable law.

The Firm will provide breastfeeding employees with space in close proximity to the employee's work area that is that shielded from view and free from intrusion from co-workers and the public, to express breastmilk. The room or location may include the place where the employee normally works if it otherwise meets the requirements of the lactation space. Restrooms are prohibited from being utilized for lactation purposes.

An employee who believes they need a lactation accommodation should submit a request for possible accommodation by emailing [HumanCapital@warburgpincus.com](mailto:HumanCapital@warburgpincus.com). Upon receiving an accommodation request, the Firm will respond to the employee within 5 business days. The Firm and the employee shall engage in an interactive process to determine the appropriate accommodations.

The Firm may not be able to provide an accommodation if doing so would impose an undue hardship by causing significant expense or operational difficulty when considering the accommodation request in relation to the size, financial resources, nature, or structure of the Company. If the Company is unable to provide an accommodation because doing so would impose an undue hardship, the Firm will provide the employee with a written

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response that identifies the basis upon which the Company is denying the request for accommodation.

California law and the San Francisco Lactation in the Workplace Ordinance expressly prohibits discrimination or retaliation against lactating employees for exercising their rights granted by the ordinance. This includes those who request time to express breast milk at work and/or who lodge a complaint related to the right to lactation accommodations.

Employees have the right to file a complaint with the Labor Commissioner for any violation of the rights underlying this policy. Employees can contact Human Capital with questions regarding this policy.

## DOMESTIC VIOLENCE/SEXUAL ASSAULT/ STALKING LEAVE

Employees are entitled to be absent from work for up to twelve (12) weeks in any 12-month period in order to seek medical attention or psychological counseling for injuries arising from, to obtain certain services relating to, and to protect themselves from, domestic violence, stalking, or sexual assault and, more generally, to attend judicial proceedings relating to certain defined felonies committed against the employee, an immediate family member or registered domestic partner of the employee or the registered domestic partner of the employee's parent, and to appear in court to be heard at any proceeding involving a post-arrest release decision (including plea, sentencing, post-conviction release or in which a right of the victim of certain specified offenses is at issue).

To invoke this leave, the employee must provide reasonable advance notice of the employee's intention to take time off, unless advance notice is not feasible. When advance notice is not feasible or an unscheduled absence occurs, the employee must provide appropriate documentation supporting the need to take such time off from work within a reasonable time after the absence. Employees may substitute any accrued PTO for the unpaid leave provided under this policy. Leave under this policy does not extend the time allowable under the "Family and Medical Leave Act" Policy.

No employee will be subject to discrimination or retaliation because of the employee's status as a victim of domestic violence, sexual assault, or stalking. Victims of domestic violence, sexual assault, or stalking may also request other accommodations in the workplace such as implementation of safety measures. If you should have any questions or require additional information about whether you qualify for this leave, please contact Human Capital.

## OVERTIME

When operating requirements or other needs cannot be met during regular working hours, employees will be required to work overtime assignments. All overtime work must receive prior authorization. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work. Non-exempt employees who work more

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than eight hours in any workday or more than 40 hours in any workweek will also be paid overtime as follows:

- One and one-half times the employee’s regular hourly rate for all hours worked in excess of eight hours up to and including 12 hours in any workday, and for the first eight hours worked on the seventh consecutive day of work in a workweek; and
- Double the employee’s regular hourly rate for all hours worked in excess of 12 hours in any workday and for all hours worked in excess of eight on the seventh consecutive day of work in a workweek.

There may be exceptions to these standards where allowed by law. Overtime pay is based on actual hours worked. PTO, holidays, sick days or any leave of absence will not be considered hours worked for purposes of performing overtime calculations. Failure to work scheduled overtime or overtime worked without prior authorization from your manager may result in disciplinary action, up to and including possible termination of employment.

BREAKS AND MEAL PERIODS

All employees who work more than five (5 hours in a workday are entitled to an uninterrupted, off duty meal period of at least 30 minutes before the end of the fifth hour of work. When an employee works for six (6 hours or less, the meal period may be voluntarily waived by the employee. Employees who work over ten (10 hours in a day are entitled to a second uninterrupted, off-duty meal period of at least 30 minutes before the end of the tenth hour of work. When an employee works for 12 hours or less, this meal period may be voluntarily waived by the employee if the first meal period was not waived in any manner. Employees who work more than twelve (12 hours may not waive, and should take, their second unpaid, uninterrupted 30-minute meal period. The Firm provides all full-time employees with a paid lunch hour; otherwise, meal periods are unpaid. Unless otherwise directed by your supervisor in writing, approval from or notification to your supervisor when taking a meal period is not required. Employees are responsible for scheduling their own meal period, but it should begin no later than before the end of the fifth hour of work. For example, an employee who begins working at 8:00 a.m. must begin their meal period before 1:00 p.m. Employees entitled to a second meal period should schedule it so it begins no later than before the end of their tenth hour of work. When scheduling meal periods, employees should try to anticipate their work flow and deadlines.

Employees are encouraged to take their meal periods; they should completely stop working for at least 30 minutes. Employees are prohibited from working “off the clock” during their meal period. Employees who record their time must accurately record their meal periods by recording the beginning and end of each work period. Employees are expected to promptly return to work at the end of any meal period.

In addition, the Firm also provides non-exempt employees who work at least three and one-half (3½ hours per day with an uninterrupted rest period of ten (10 minutes “net” rest time per four (4 hours worked or major fraction thereof, and which insofar as practicable shall be in the middle of each work period. For purposes of this policy, “major fraction” means any time greater than two (2) hours. Employees are, therefore, generally entitled

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to one 10-minute rest period for shifts from three and one-half to six hours in length, two 10-minute rest periods for shifts of more than six hours up to 10 hours, three 10-minute rest periods for shifts of more than 10 hours up to 14 hours, and so on. Employees do not need to obtain approval from or notify their supervisor when taking a rest break. Employees are encouraged to take their rest breaks; they are not expected to and should not work during their rest breaks. Rest periods are counted as hours worked, and thus, employees are not required to clock in and out for rest periods.

All rest breaks and meal periods must be taken outside employees' work areas. Employees should not visit or socialize with employees who are working while taking their rest break or meal period. Employees may leave the premises during rest breaks and meal periods. Employees are not expected to remain "on call" nor available to respond to messages, telephones, email or other messaging devices during meal and rest periods -- even those who are in a sensitive position like security or information technology. Employees are required to notify Human Capital immediately if they believe they are being pressured or coerced by any manager, supervisor, or other employee to forego any portion of a provided rest break or meal period.

Please note that any violation of this policy may result in disciplinary action up to and including termination of employment.

Below is a chart that summarizes the rest breaks and meal periods provided to employees:

| Hours of Work                     | Rest Breaks and/or Meal Periods   |
|-----------------------------------|---|
| 0 to 3.4 ( <i>less than 3.5</i> ) | 0   |
| 3.5 to 4.0                        | One 10-minute paid rest break   |
| More than 4.0 up to 5.0           | One 10-minute paid rest break   |
| More than 5.0 up to 6.0           | One 10-minute paid rest break and one 30-minute unpaid meal period (unless first meal period is mutually waived)      |
| More than 6.0 up to 10.0          | Two 10-minute paid rest breaks and one 30-minute unpaid meal period   |
| More than 10.0 up to 12.0         | Three 10-minute paid rest breaks and two 30-minute unpaid meal periods (unless second meal period is mutually waived) |
| More than 12.0 up to 14.0         | Three 10-minute paid rest breaks and two 30-minute unpaid meal periods  |

PAID TIME OFF

Despite any general Firm or Guidelines policy to the contrary, any unused accrued paid time off (PTO) days will carry over into the next calendar year, but once an employee has

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accrued one and a half times the maximum amount of PTO set forth in the Guidelines that an employee is entitled to accrue in a year, the employee will not become eligible to accrue any additional PTO in that calendar year, except to the extent that prior PTO is used. For accrual rates, please refer to the charts contained in the Guidelines.

Employees separating from the Firm who have accrued unused PTO for the current calendar year (including and carry-over days from the prior year) will be paid for the unused time they have accrued in accordance with applicable law.

## PAID SICK TIME

### ACCRUAL

All salaried employees begin accruing paid sick time at the start of employment and will receive seventy-two (72) hours of paid sick time at the time of hire and at the beginning of each calendar year. All hourly employees will accrue one (1) hour of paid sick time for every thirty (30) hours worked and accrual is capped at seventy-two (72) hours. Once the accrual cap of seventy-two (72) hours is reached, paid sick time will stop accruing until some paid sick time is used. Employees who are exempt from overtime pursuant to the California executive, administrative, and professional exemptions are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid sick time accrues based upon that normal workweek. For purposes of this policy, the year is the period from January 1st through December 31st.

### USAGE

Employees may use all or any percentage of their accrued paid sick time for the purposes outlined below. Deductions from paid sick time balances will be made based on the actual hours the employee is absent from work due to illness or injury. Employees must use a minimum of one (1) hour of paid sick time for each instance.

Paid sick time may be used for the following reasons:

1. For the employee or a family member to receive preventative care (such as annual physicals or flu shots);
2. For the employee's or a family member's illness, injury, or for medical care, treatment, or diagnosis;
3. For the employee, who is a victim of domestic violence, sexual assault, or stalking:
  - a) To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
  - b) To help ensure the health, safety, or welfare of the victim or the victim's child;
  - c) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
  - d) To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
  - e) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or

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f) To participate in safety planning and take other actions to increase safety from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation.

4. For purposes related to donating the employee's bone marrow or an organ of the employee to another purpose, or to care for or assist a family member donating bone marrow or an organ; or
5. Any other reason required by applicable law.

For purposes of this policy, a family member includes any of the following: parent, child (including a biological child, a registered domestic partner's child, and a child of a person standing in loco parentis), spouse or registered domestic partner, grandparent, grandchild, sibling, or designated person (a person identified by the employee at the time the employee requests paid sick leave) and applies not only to biological relationships, but also applies to those resulting from adoption, step-relationships and foster care relationships. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Employees who do not have a spouse or registered domestic partner may designate, in writing and in advance, one person for whom the employee may use paid sick time when providing aid or care for the person consistent with the policy as outlined above. Employees without a spouse or registered domestic partner have ten (10) work days following the date on which their first paid hour of sick time accrues to designate such person. Thereafter, employees will have the opportunity to make such designation or change an existing designation on an annual basis, commencing each January 1st and extending for a period of ten (10) work days. Human Capital will provide to each employee a form for this purpose.

### NOTICE AND DOCUMENTATION

Notice may be given orally or in writing. If the need for paid sick leave is foreseeable, the employee must provide reasonable advance notification. In most cases, "reasonable" generally means notifying your manager at least one (1) week in advance of the foreseeable absence. If the need for paid sick leave is unforeseeable, the employee must provide notice as soon as practicable. In most cases, "as soon as practicable" generally means notifying your manager at least two (2) hours prior to the start of a work shift, if possible. In cases of accidents or sudden illnesses when an employee is not able to provide such notice under the circumstances, notice should be provided as soon as possible.

To the maximum extent permitted by applicable law, an employee who is absent from work on paid sick leave for more than three (3) consecutive work days or twenty-four (24) consecutively scheduled work hours, whichever is greater, must present a certificate from the employee's medical practitioner stating the leave was necessitated by an illness or injury, releasing the employee's return to work, and setting forth any restrictions or limitations on the ability to perform the job. Similarly, when an employee uses paid sick leave for more than three (3) consecutive work days or twenty-four (24) consecutively scheduled work hours, whichever is greater, to care for a family member must also present a certificate from that person's medical practitioner stating leave was necessitated by that person's illness.

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## PAYMENT

Eligible employees will receive payment for paid sick leave at the same rate of pay as the employee normally earns during regular work hours by the next regular payroll period after the leave was taken unless otherwise required by applicable law, and in no event will the rate of pay be less than the San Francisco or California minimum wage, whichever is higher. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

## CARRYOVER AND PAYOUT

Accrued paid sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of seventy-two (72) hours. Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

## ENFORCEMENT AND RETALIATION

The Firm prohibits discrimination and retaliation against employees who assert their rights to receive and use paid sick time under this policy, file a complaint or allege a violation of their rights with respect to paid sick leave, cooperate in an investigation or prosecution, or oppose a policy of practice prohibited by applicable state or local law. Employees may file a complaint with the California Labor Commissioner (reachable by phone at (415) 703-4810, by email at [DLSE2@dir.ca.gov](mailto:DLSE2@dir.ca.gov), or by visiting <https://www.dir.ca.gov/DLSE/dlse.html>) or the San Francisco Office of Labor Standards Enforcement (reachable by phone at (415) 554-6271, by email at [PSL@sfgov.org](mailto:PSL@sfgov.org), or by visiting [www.sfgov.org/olse/pslo](http://www.sfgov.org/olse/pslo)).

Questions regarding this policy may be directed to Human Capital.

## MASS TRANSIT COMMUTER BENEFITS

All employees who work ten (10) or more hours a week within the City and County of San Francisco are eligible to receive mass transit commuter benefits. To provide these benefits, the Firm has elected to provide a pre-tax election program that permits employees to exclude certain commuting costs from taxable wages.

Please contact Human Capital for further information about the program or to sign up for benefits.

## FAMILY FRIENDLY WORKPLACE POLICY

San Francisco employees who have been employed for at least six (6) months and who regularly work at least eight (8) hours per week may request, in writing, either a Flexible Working Arrangement or a Predictable Working Arrangement to assist with caregiving responsibilities for either a child or children under the age of 18; a person or persons with a serious health condition in a family relationship with the employee; or a person employee, age 65 or older in a family relationship with the employee.

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“Family relationship” means a relationship in which the employee is related to the person needing care by blood, legal custody, marriage or domestic partnership as a spouse, domestic partner, child, parent, sibling, grandchild or grandparent.

“Flexible Working Arrangement” means a change in the employee’s terms and conditions of employment that provides flexibility to assist the employee with caregiving responsibilities. A Flexible Working Arrangement may include but is not limited to a modified work schedule, changes in start and/or end times for work, part-time employment, job sharing arrangements, working from home, telecommuting, reduction or change in work duties, or part-year employment. “Predictable Working Arrangement” means a change in the employee’s terms and conditions of employment that provides scheduling predictability to assist that employee with caregiving responsibilities.

Employees who wish to request a Flexible Working Arrangement or a Predictable Working Arrangement should contact Human Capital to obtain the necessary form to submit the request in writing. Within fourteen (14) days of an employee’s request, the Firm may meet with the employee regarding the request. Within twenty-one (21) days of an employee’s request, the Firm will meet with the employee regarding the request. Within twenty-one (21) days of an employee’s request, the Firm will issue a written response either granting or denying the request. If the Firm denies the request, the written response to the employee will explain the basis for the denial and invite the employee to engage in an interactive process meeting for the purpose of attempting, in good faith, to determine a Flexible Working Arrangement or Predictable Working Arrangement that is acceptable to both the employee and the Firm. Any notice denying an employee request for a Flexible Working Arrangement or Predictable Working Arrangement will advise the employee of the right to request reconsideration and include a copy of the San Francisco posting about the San Francisco Family Friendly Workplace ordinance.

If it is later determined that a Flexible Working Arrangement or a Predictable Working Arrangement that was previously granted is causing an undue hardship, the Firm will invite the employee to engage in an interactive process. If this interactive process is unsuccessful in determining a different Flexible Working Arrangement or Predictable Working Arrangement, the Firm may revoke any existing arrangement with 14 days written notice.

The Firm will not discharge, threaten to discharge, demote, suspend, or otherwise take adverse employment action against any person on the basis of caregiver status, in retaliation for requesting flexible or predictable working arrangements, or for cooperating with the City in enforcement of any such request or related denial.

## DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION POLICY (ADDENDUM TO POLICY AGAINST DISCRIMINATION AND HARASSMENT)

All employees of the Firm are required to undergo harassment prevention training as required by applicable law. For more information on this training requirement, employees can visit <https://calcivilrights.ca.gov/shpt/>.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## SAN FRANCISCO PART-TIME EMPLOYEES – PAID AND UNPAID TIME OFF

The Firm provides part-time employees with the same access to paid and unpaid time off under the Firm's Paid Time Off and Sick policies as that afforded to full-time employees for the same job classification but such paid and unpaid time off will be pro-rated based on the number of hours that the part-time employee works as compared to a full-time employee.

## EMPLOYEE-APPLICANT CCPA NOTICE

Last Updated: 11/18/2022

This notice describes the categories of personal information collected by the Firm and the purposes for which such information may be collected and used. For additional information about the Firm's data privacy practices, please review our [Privacy Policy](#).

### CATEGORIES OF PERSONAL INFORMATION COLLECTED

**Identifiers and Contact information.** This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, account names, dates of birth, bank account information, and other similar contact information and identifiers.

#### Protected Classification Information

This category includes characteristics of protected classifications under California or federal law.

#### Internet or Other Electronic Network Activity Information.

This category includes, without limitation:

- all activity on the Firm's information systems, such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames and passwords
- all activity on communications systems, including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of Firm-issued devices.

#### Geolocation Data

This category includes, without limitation, GPS location data from Firm-owned or issued mobile devices, applications, or vehicles.

#### Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information.

This category includes, for example, information collected from cameras, thermometers, and similar devices.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

#### Biometric Information.

This category includes the use of biometric equipment, devices, or software to record your time worked, to enter or exit facilities or rooms, to access or use equipment, or for other business purposes.

#### Professional and Employment-Related Information.

This category includes, without limitation:

- data submitted with employment applications, including salary history, employment history, employment recommendations, etc.
- background check and criminal history
- work authorization
- fitness for duty data and reports
- performance and disciplinary records
- salary and bonus data
- benefit plan enrollment, participation, and claims information
- leave of absence information, including religious and family obligations, and physical and mental health data, concerning employees and their family members

#### Education Information

This category includes, without limitation, education history.

#### Sensitive Personal Information

This category includes sensitive information such as:

- social security, driver's license, state identification card, or passport number
- financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc.
- precise geolocation
- racial or ethnic origin, religious or philosophical beliefs, or union membership
- content of mail, email, and text messages unless the Firm is the intended recipient of the communication
- genetic data
- biometric information for the purpose of uniquely identifying a consumer
- health information
- information concerning sex life or sexual orientation

#### Purposes Personal Information, Including Sensitive Personal Information, Is Used

- Collecting and processing employment applications, including confirming eligibility for employment, background and related checks, onboarding, and related recruiting efforts.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

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- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling, and leave of absence administration.
- Maintaining physician records and occupational health programs.
- Maintaining personnel records and record retention requirements.
- Communicating with employees and/or employees' emergency contacts and plan beneficiaries.
- Complying with applicable state and federal health, labor, employment, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.
- Preventing unauthorized access to, use, or disclosure/removal of the Firm's property, including the Firm's information systems, electronic devices, network, and data.
- Ensuring and enhancing employee productivity and adherence to the Firm's policies.
- Providing training and development opportunities.
- Investigating complaints, grievances, and suspected violations of Firm policy.
- Designing, implementing, and promoting the Firm's diversity and inclusion programs.
- Facilitating the efficient and secure use of the Firm's information systems.
- Ensuring compliance with the Firm information systems policies and procedures.
- Improving safety of employees, customers and the public with regard to use of Firm property and equipment.
- Improving efficiency, logistics, and supply chain management.
- Improving accuracy of time management systems and attendance, including vacation, sick leave, and other leave of absence monitoring.
- Evaluating an individual's appropriateness for a particular position at the Firm, or promotion to a new position.
- Managing customer engagement and other legitimate business purposes.
- Responding to and managing legal claims against the Firm and/or its personnel, including civil discovery in litigation.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, merger and acquisition activities, and maintenance of licenses, permits and authorization applicable to Firm operations.

#### Retention

We retain your personal information for as long as is necessary to process your application for employment, process your payroll, and administer your benefits and in accordance with the Firm's data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does not include certain categories of information, such as publicly available information from government records, and deidentified or aggregated consumer information.

#### Disclosure

To carry out the purposes outlined above, the Firm may disclose personal information to service providers or other third parties, such as background check vendors, third-party staffing vendors, information technology vendors, outside legal counsel, and state or federal governmental agencies. Each party has agreed to safeguard any personal information to at least the same standards as the Company and to comply with the Company's direction regarding consumer individual rights requests. The Firm does not sell or share, as those terms are defined under applicable law, the above categories of personal information. The Firm may add to the categories of personal information it collects and the purposes for which it uses that information. The Firm will inform you in the event it does so.

#### CALIFORNIA RESIDENT INDIVIDUAL RIGHTS REQUESTS

Individuals who are residents of the State of California have certain individual rights, which are outlined below.

##### Right To Know About Personal Information Collected or Disclosed

As a California resident, you have the right to request additional information, beyond that disclosed above, regarding the following, to the extent applicable :

- the categories of personal information the Firm collected about you
- the categories of sources from which that personal information was collected
- the business or commercial purposes for which that information was collected, sold, or shared
- the categories of third parties to whom the information was disclosed
- the specific pieces of personal information collected

Upon receipt of a verifiable request to know, and as required by applicable law, we will provide a response to such request.

##### Right To Request Deletion of Your Personal Information

You have the right to request that we delete the personal information we collected or maintain about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records, and will direct any service providers and contractors to whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.



Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Firm and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

Upon receipt of a verifiable request to delete, and as required by applicable law, we will provide a response to such requests.

#### Right to Request Correction

You have the right to request that the Firm correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it. Upon receipt of a verifiable request to correct, and as required by the CCPA, we will provide a response to such requests.

#### Right to Non-Discrimination for the Exercise of Your Privacy Rights

We will not discriminate or retaliate against you for exercising any of the rights described above.

#### SUBMITTING CCPA RIGHTS REQUESTS.

To submit a CCPA Rights request as outlined above, please contact the Firm's Human Capital Department emailing us at [humancapital@warburgpincus.com](mailto:humancapital@warburgpincus.com). We reserve the right to only respond to verifiable consumer requests to know, delete, or correct that are submitted as instructed.

#### Spouses, Dependents, and Associates

If you have knowledge that the Firm collected personal information related to your spouse, dependent, or associate, please share a copy of this notice with all such individuals.

We reserve the right to amend this notice at any time without advance notice. Please direct questions about this notice to or [humancapital@warburgpincus.com](mailto:humancapital@warburgpincus.com).

## BEREAVEMENT LEAVE

Employees who have been employed for at least 30 days may take bereavement leave of up to five (5) days upon the death of a family member. For the purposes of this policy a family member includes a spouse or a child, parent, sibling, grandparent, grandchild, domestic partner, or parent-in-law .

Bereavement leave need not be consecutive but must be completed within three months of the family member's death.

Bereavement leave will be paid and is paid at the employee's base rate of pay at the time of absence for the number of hours the employee otherwise would have worked that day. Bereavement leave is not counted as hours worked for purposes of calculating overtime.

Employees must inform Human Capital prior to commencing bereavement leave.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

Employees, if requested by the Company, within 30 days of the first days leave must provide documentation of the death of the family member. Documentation includes, but is not limited to, a death certificate, a published obituary, or written verification of death, burial, or memorial services from a mortuary, funeral home, burial society, crematorium, religious institution, or governmental agency.

The Firm will maintain the confidentiality of any employee requesting leave under this policy including documentation provided to the Firm related to a request for leave.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

# COLORADO SUPPLEMENT

## PREGNANCY ACCOMMODATIONS

In compliance with Colorado law (Colo. Rev. Stat. § 24-34-402.3 et seq.), the Firm will not discriminate against an applicant or employee because of pregnancy, childbirth, or related conditions. If an applicant or employee requests a reasonable accommodation due to health conditions related to pregnancy or the physical recovery from childbirth, the Firm will endeavor to provide a reasonable accommodation to enable applicants and employees to perform the essential functions of the job, unless the accommodation would impose an undue hardship on the operation of the Firm's business. The Firm will engage in a timely, good faith, and interactive process with the employee to determine effective, reasonable accommodations for the employee for conditions related to pregnancy, physical recovery from childbirth, or a related condition.

Reasonable accommodations may include but are not limited to: more frequent or longer break periods; more frequent restroom, food, and water breaks; acquisition or modification of equipment or seating; limitations on lifting; temporary transfer to a less strenuous or hazardous position if available, with return to the current position after pregnancy; job restructuring; light duty, if available; assistance with manual labor; or modified work schedules.

The Firm will not require an applicant or employee affected by pregnancy, physical recovery from childbirth, or a related condition to accept an accommodation that the individual chooses not to accept if the individual did not request an accommodation or if the accommodation is not necessary for the applicant or employee to perform the essential functions of the job, nor will the Firm require a pregnant employee to take leave if another reasonable accommodation is available which will permit the employee to continue working.

The Firm reserves the right to require an applicant or employee to provide a note stating the necessity of a reasonable accommodation from a licensed health care provider before providing a reasonable accommodation.

The Firm will not take adverse action against a pregnant employee who requests or uses a reasonable accommodation related to pregnancy, physical recovery from childbirth, or a related condition. The Firm will not deny employment opportunities to an applicant or employee based on the need to make a reasonable accommodation related to the applicant's or employee's pregnancy, physical recovery from childbirth, or a related condition.

If employees have any questions concerning this policy, they should contact Human Capital.

## PAID TIME OFF (ADDENDUM TO PTO POLICY)

The Firm provides eligible employees with paid time off in the form of PTO. Despite any general Handbook policy to the contrary, all accrued, unused PTO may be carried over from year to year, but an employee may only accrue up to a maximum of the then-applicable

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

annual accrual. Once an employee reaches this overall accrual cap, no additional time will be accrued until an employee uses some of the already accrued time at which point accrual will continue subject to the annual accrual maximum and overall accrual cap. Accrued, unused PTO will be paid upon separation of employment.

**LEAVE FOR STALKING, SEXUAL ASSAULT, OR DOMESTIC ABUSE/VIOLENCE**

The Firm will provide up to three (3) working days of unpaid leave in any 12-month period for Colorado employees who are victims of stalking, sexual assault, domestic abuse, or domestic violence. To be eligible, an employee must have one (1) year of service with the Firm. The leave is available for seeking a civil protection order (restraining order); obtaining medical or psychological care for the employee or the employee's children; securing legal assistance or participating in related court proceedings; securing the home from the perpetrator; or seeking alternative housing.

Employees have the option to substitute available paid time off during unpaid leave taken under this policy.

Employees must give the Firm at least three (3) days advance notice of their intention to take time off and provide appropriate documentation upon request, which may include documentation from the court or the prosecuting attorney that the employee appeared in court. In cases of imminent danger to the health and safety of the employee, reasonable advance notice is not required.

**COLORADO FAMILY CARE LEAVE  
(ADDENDUM TO FMLA POLICY)**

Like the Family and Medical Leave Act (“FMLA”) Policy described elsewhere in this Handbook, the Colorado Family Care Leave Act (“CFCLA”) may require employers to provide family and medical leaves of absence for eligible employees. Either or both of these laws may apply to a leave. Where both laws apply, any leave taken will be counted under both laws at the same time. This policy will be interpreted to comply with the law(s) that apply to a particular leave. This policy provides employees information concerning any CFCLA entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this handbook. If employees have any questions concerning CFCLA leave, they should contact Human Capital.

**BASIC FAMILY AND MEDICAL LEAVE ENTITLEMENT**

CFCLA leave may be taken under the same terms and conditions as FMLA to care for a person who has a serious health condition if the person is the employee’s civil union partner or domestic partner assuming the person has registered the domestic partnership with the municipality in which the person resides or with the state, if applicable; or is recognized by the employer as the employee's domestic partner.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

# CONNECTICUT SUPPLEMENT

## **SEXUAL HARASSMENT (ADDENDUM TO POLICY AGAINST DISCRIMINATION AND HARASSMENT)**

Sexual harassment is illegal and prohibited by Connecticut and federal law in the workplace, pursuant to § 46a-60(a)(8) of the Connecticut General Statutes and Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the Connecticut Commission on Human Rights and Opportunities (the “Commission”) at 860-541-3400, CT Toll Free 1-800-477-5737, or online at [www.ct.gov/CHRO](http://www.ct.gov/CHRO).

Individuals who engage in acts of sexual harassment may be subject to civil penalties in the form of a cease and desist orders, back pay, compensatory damages, hiring, promotion or reinstatement, emotional distress, as well as attorney’s fees, costs, pre- and post- judgment interest and punitive damages (if the case is tried in court). Individuals may also be subject to additional criminal penalties stemming from acts of sexual harassment.

Connecticut law requires that a written complaint be filed with the Commission within 300 days of the date the alleged harassment.

## **PREGNANCY ACCOMMODATIONS**

In compliance with Connecticut law, the Firm will not discriminate against an employee or prospective employee in the terms or conditions of the employee’s employment in relation to pregnancy, childbirth or a related condition including, but not limited to, lactation. The Firm will not limit, segregate or classify an employee in a way that would deprive the employee of employment opportunities due to the employee’s pregnancy.

The Firm will endeavor to provide reasonable accommodations for conditions related to pregnancy, childbirth or a related condition, including, but not limited to, lactation, unless the accommodation would pose an undue hardship on the Firm’s business. Such accommodations include, but are not limited to: being permitted to sit while working, more frequent or longer breaks, periodic rest, assistance with manual labor, job restructuring, light duty assignments, modified work schedules, temporary transfers to less strenuous or hazardous work, time off to recover from childbirth or break time and appropriate facilities for expressing breast milk.

The Firm will not force an employee or prospective employee affected by pregnancy to accept a reasonable accommodation if such employee or person seeking employment does not have a known limitation related to the employee’s pregnancy, or does not require a reasonable accommodation to perform the essential duties related to the employee’s employment. This includes, but is not limited to, forcing an employee to take leave if another reasonable accommodation can be provided to an employee’s condition related to the pregnancy, childbirth, or a related medical condition.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

The Firm will not retaliate against an employee in the terms, conditions or privileges of the employee's employment based upon such employee's request for a reasonable accommodation under this policy. Further, the Firm will not deny employment opportunities to an employee or prospective employee due to an employee's or prospective employee's request for a reasonable accommodation related to pregnancy, childbirth, or a related medical condition.

If employees have any questions about or would like to request a reasonable accommodation pursuant to this policy, they should contact Human Capital.

## LEAVE FOR FAMILY OR DOMESTIC VIOLENCE

Employees who are victims of family or domestic violence are allowed at least twelve (12) days of unpaid leave during any calendar year for a qualifying purpose. An employee also may be eligible for reasonable unpaid leave if the employee's child is the victim of domestic violence. "Family violence" includes incidents resulting in physical harm, bodily injury, assault, or an act of threatened violence between family or household members. "Domestic violence" includes family violence, as well as stalking, threatening or intimidation, or coercive control.

The purpose of a qualifying leave should be to:

- 1) Seek medical care or counseling for injury or disability as a result of family or domestic violence (including for a child who is a victim of domestic violence, provided the employee is not the perpetrator of the domestic violence against the child);
- 2) Obtain services from a victim services organization;
- 3) Obtain psychological counseling related to an incident(s) of family or domestic violence (including for a child who is a victim of domestic violence, provided the employee is not the perpetrator of the domestic violence against the child);
- 4) Take action to increase safety from future incidents of domestic violence, including temporary or permanent relocation; or
- 5) Obtain legal services, assist in the prosecution of the offense, or otherwise participate in any civil or criminal proceeding related to or resulting from such family or domestic violence.

Employees are not paid while on family or domestic violence leave, but may use any accrued and unused paid time off time in connection with use of this leave. To the extent practicable, employees must provide reasonable (preferably seven (7) days) notice to request a family or domestic violence leave.

Employees should provide one of the following documents in connection with their use of family or domestic violence leave: a signed, written statement certifying that the leave is a result of an incident of family or domestic violence; a police or court record related to the incident of family or domestic violence; or a signed, written statement that the employee is a victim of family or domestic violence from an employee or agent of a victim services organization, an attorney, an employee of the office of victim services or victim advocate, or a medical professional or other professional from whom the employee has sought

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

assistance concerning the incident of family or domestic violence. The Firm will make every attempt to ensure documents provided in support of a family or domestic violence leave request under this policy remain confidential and protected from disclosure unless required by law.

Note: Eligible employees may apply to the Connecticut Paid Leave Authority for Paid Leave benefits for otherwise unpaid family violence leave under this policy (up to 12 days).

## PAID FAMILY AND MEDICAL LEAVE BENEFITS

The Paid Family and Medical Leave Act is a mandatory statewide insurance program administered by the state-created Paid Leave Authority. Employees may be eligible for Connecticut Paid Family and Medical Leave ("CPL") income replacement benefits beginning as of January 1, 2022. Benefits are financed through employee contributions to the program, which began on January 1, 2021. The Authority is solely responsible for determining whether an employee is eligible for benefits and the amount of any benefits payable.

It is the employee's responsibility to apply for CPL benefits and to cooperate in the CPL application process. It is also the employee's responsibility to immediately provide the Firm with the Employer Verification form upon receipt of this form from the Authority. The form must be sent to Human Capital via [Ashley.Winslow@warburgpincus.com](mailto:Ashley.Winslow@warburgpincus.com). The employee must also provide Human Capital with confirmation of 1) the application for benefits and 2) the approval of benefits and amount to be received.

Receipt of CPL benefits does not, by itself, provide job-protection to employees. For an employee to be considered for job-protected leave, they must follow the process for requesting Federal FMLA/CFMLA or other job-protected leave. CPL benefit periods may run concurrently with Federal FMLA/CFMLA or other leaves.

### ELIGIBILITY

To be eligible for CPL benefits, an employee of a private employer must have earned at least \$2,325 during one of the first 4 of the 5 most recently completed quarters and be presently employed or employed in the previous 12 weeks. The amount of paid benefits will vary depending upon the employee's wages, and the maximum available benefit is capped at 60 times the state minimum wage. For additional information, please visit <https://ctpaidleave.org>.

### AMOUNT OF BENEFITS

Employees are eligible for up to 12 weeks of CPL benefits in a rolling 12-month "lookback" period, with an additional 2 weeks of CPL benefits available for a serious health condition resulting in incapacitation that occurs during a pregnancy. If benefits are to care for an injured servicemember, then up to 12 weeks of CPL benefits are available, notwithstanding any additional approved leave for this reason. Up to 12 days of CPL benefits are available for otherwise unpaid family violence leave pursuant to Conn. Gen. Stat. Sec. 31-51ss.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## COVERED REASONS

Employees may apply for CPL benefits for:

1. The employee's own serious health condition;
2. To care for the employee's child after birth or placement for adoption or foster care;
3. To care for the serious health condition of the employee's child, spouse, parent (including in-law), sibling, grandparent, grandchild, or any other individual related to the employee by blood or affinity whose close association the employee shows to be the equivalent of these family relationships;
4. To serve as an organ or bone marrow donor;
5. For any qualifying exigency;
6. To care for an injured servicemember;
7. For otherwise unpaid family violence leave pursuant to Conn. Gen. Stat. Sec. 31-51ss.

## INTERACTION WITH OTHER PAID BENEFITS

If an employee needs time away from work for a reason covered by CPL benefits, they may not be eligible to use any Company-provided paid benefits unless they apply for benefits from the Paid Leave Authority, including providing all required information to the Paid Leave Authority in connection with the application, to the extent Company-provided paid benefits require application for statutory benefits as a condition of receipt of the Firm-provided paid benefits. This includes eligibility to use Company-provided benefits to supplement CPL benefits up to 100% of the employee's regular pay. The Firm may require the employee to provide proof of application and/or approval for CPL benefits.

If an employee has applied to the Paid Leave Authority to receive CPL benefits and such application is denied, the employee may be required to use accrued paid time off for the applicable time period (unless the period of time is covered by CFMLA and the employee has two weeks or fewer of paid time off remaining).

Regardless of any remaining available Company-provided benefits, employees who are unable to demonstrate entitlement to job protection for their time away from work may be subject to disciplinary action under the Firm's attendance policy.

## UNLAWFUL ACTS

It is unlawful to retaliate against an employee who applies for CPL benefits.

## CONNECTICUT FAMILY AND MEDICAL LEAVE POLICY (ADDENDUM TO FMLA POLICY)

Like the Family and Medical Leave Act ("FMLA") Policy described elsewhere in this Handbook, the Connecticut Family and Medical Leave Act ("CFMLA") may require employers to provide family and medical leaves of absence for eligible employees. Either or both of these laws may apply to a leave. This policy will be interpreted to comply with the law(s) that apply to a particular leave. To the extent that state law mandates additional

protection for pregnant employees, this policy also will be interpreted consistently with such requirements. This policy provides employees information concerning any CFMLA entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this handbook. If employees have any questions concerning CFMLA leave, they should contact Human Capital.

## ELIGIBILITY

Employees may be eligible for leave under CFMLA if they have been employed by the Firm for at least three (3) months immediately preceding the date the CFMLA leave will commence pursuant to the employee's request for leave.

## BASIC FAMILY AND MEDICAL LEAVE ENTITLEMENT

The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. Under the CFMLA, an eligible employee may take up to twelve (12) weeks of unpaid leave within a 12-month period, with an additional two (2) weeks available for an incapacitating serious health condition that occurs during pregnancy. The 12-month period is measured by a "rolling" twelve (12) month period dating back from the time the employee requests leave. Where both laws apply, the leave provided by each will run concurrently.

In addition to the entitlements outlined in the FMLA policy, the CFMLA provides leave to care for (as each of these terms is defined by the law) an employee's parent-in-law, sibling, grandparent, grandchild, or any other individual related to the employee by blood or affinity whose close association the employee shows to be the equivalent of these family relationships (or of a child, parent, or spouse). The CFMLA also provides leave to serve as an organ or bone marrow donor.

For purposes of CFMLA leave with regard to leave to care for the serious health condition of a family member, "son or daughter" means a biological, adopted or foster child, stepchild, legal ward, or, in the alternative, a child of a person standing in loco parentis, or an individual to whom the employee stood in loco parentis when the individual was a child. "Grandchild" means a grandchild related to a person by blood, marriage, adoption by a child of the grandparent, or foster care by a child of the grandparent. "Grandparent" means a grandparent related to a person by blood, marriage, adoption of a minor child by a child of the grandparent, or foster care by a child of the grandparent. "Parent" means a biological parent, foster parent, adoptive parent, stepparent, parent-in-law or legal guardian of an eligible employee or an eligible employee's spouse, an individual standing in loco parentis to an eligible employee, or an individual who stood in loco parentis to the eligible employee when the employee was a child. "Sibling" means a brother or sister related to a person by blood, marriage, adoption by a parent of the person, or foster care placement.

## ADDITIONAL MILITARY FAMILY LEAVE ENTITLEMENT (INJURED SERVICEMEMBER LEAVE)

In addition to the basic FMLA and CFMLA leave entitlements, an eligible employee who is the spouse, son, daughter, parent or next of kin (as these relationships are defined by each law) of a covered servicemember is entitled to take up twenty-six (26) weeks of



leave during a single 12-month period to care for the servicemember with a serious injury or illness. For purposes of Injured Servicemember Leave under the CFMLA, “next of kin” means the armed forces member’s nearest blood relative, other than the covered armed forces member’s spouse, parent, son or daughter, in the following order of priority: Blood relatives who have been granted legal custody of the armed forces member by court decree or statutory provisions, brothers and sisters, grandparents, aunts and uncles, and first cousins, unless the covered armed forces member has specifically designated in writing another blood relative as his or her nearest blood relative or any other individual whose close association with the employee is the equivalent of a family member for purposes of military caregiver leave, in which case the designated individual shall be deemed to be the covered armed forces member’s next of kin; and “son or daughter” means a biological, adopted or foster child, stepchild, legal ward or child for whom the eligible employee or armed forces member stood in loco parentis and who is any age.

Leave to care for a servicemember is only available during a single 12-month period and, when combined with other FMLA- or CFMLA-qualifying leave, may not exceed twenty-six (26) weeks during the single 12-month period. The single 12-month period begins on the first day an eligible employee takes leave to care for the injured servicemember.

#### **RETURN TO WORK/FITNESS FOR DUTY MEDICAL CERTIFICATIONS**

Similarly-situated employees, such as employees with the same occupation or same serious health condition, returning to work from family and medical leaves that were taken because of their own serious health conditions that made them unable to perform their jobs must provide the Firm with medical certification confirming they are able to return to work. The certification itself need only be a simple statement of an employee’s ability to return to work; however, the Firm may provide the employee a list of the employee’s essential job functions and may require the employee to provide the list to the health care provider in making the fitness-for-duty determination. Employees may obtain a Return to Work Medical Certification Form from Human Resources. The Firm may delay job restoration following leave, other than an intermittent leave under the CFMLA, until employees provide return to work/fitness for duty certifications.

At the end of a leave under the CFMLA, employees will be returned to their original job, unless that job is not available, in which case they will be returned to an equivalent position. There is no key employee exception under the CFMLA.

#### **UNLAWFUL ACTS**

It is unlawful to retaliate against an employee who requests to use or uses leave under the CFMLA or otherwise exercises rights under CFMLA or to interfere with, restrain or deny the exercise of any rights under CFMLA. It is also unlawful to discharge or discriminate against any person for opposing any practice made unlawful by CFMLA or for involvement in any proceeding under or relating to CFMLA.

#### **ENFORCEMENT**

An employee may file a complaint with the Connecticut Department of Labor or may bring a private lawsuit against an employer.

## **PRIVACY PROTECTION POLICY**

Employees are permitted to access and use “personal information” only as necessary and appropriate for such persons to carry out their assigned tasks for the Firm and in accordance with Company policy. “Personal information” means information capable of being associated with a particular individual through one or more identifiers, including, but not limited to, a Social Security number (SSN), a driver’s license number, a state identification card number, an account number, a credit or debit card number, a passport number, an alien registration number or a health insurance identification number, and does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media. Accessing and using such information without authorization by the Firm or contrary to the Firm’s policies and procedures can result in discipline up to and including termination of employment. Employees who come into contact with SSNs or other sensitive personal information without authorization from the Firm or under circumstances outside of their assigned tasks may not use or disclose the information further, but must contact Human Capital to turn over all copies of the information in whatever form.

For more information about whether and under what circumstances employees may have access to this information, employees may review their job description or contact Human Capital.

# DISTRICT OF COLUMBIA SUPPLEMENT

## ACCOMMODATIONS FOR PREGNANCY, CHILDBIRTH AND BREASTFEEDING

The Firm will endeavor to provide reasonable accommodations to employees working in the District of Columbia whose ability to perform job functions is limited by pregnancy, childbirth, related medical conditions, or breastfeeding as required by law, unless such accommodations would result in an undue hardship to the Firm. We will engage in a good faith and timely interactive process to determine whether a reasonable accommodation can be provided for such employees. We may request necessary medical certification. Reasonable accommodations may include: more frequent or longer breaks, time off to recover from childbirth, equipment modification, seating, temporary transfer to a less strenuous job, job restructuring or light duty, and having the employee refrain from heavy lifting, relocating the employee's work area, as well as accommodations for lactation such as providing private (non-bathroom) space for expressing breast milk as described in more detailed below.

In accordance with D.C. law, the Firm will provide reasonable daily break periods to accommodate an employee who is a nursing mother desiring to express breast milk for the employee's child. The break time, if possible, will run concurrently with any rest and meal periods already provided to the employee. If the break time cannot run concurrently with rest and meal periods already provided to the employee, the break time will be unpaid. The Firm must provide a sanitary location so that breastfeeding mothers are able to express breast milk for their children. This location may be the employee's private office, if applicable

We will not interfere with, restrain or deny an employee's right to request or receive an accommodation under this policy including reasonable break time for lactation purposes under this policy. Employees will be protected from retaliation for requesting or receiving an accommodation under this policy including reasonable break time for lactation purposes, raising a complaint or concern about this policy, or filing or cooperating in the investigation of a complaint under this policy.

If employees have questions regarding this policy, would like to request a reasonable accommodation pursuant to this policy or believe they have been retaliated against in violation of this policy, they should contact Human Capital.

## D.C. PAID LEAVE BENEFITS

Employees may be eligible for paid leave benefits for covered events pursuant to the D.C. Universal Paid Leave Amendment Act ("UPLA"). The UPLA is a D.C. paid leave benefit administered by the Office of Paid Family Leave ("OPFL") at the DC Department of Employment Services. Benefits are funded through an employer payroll tax, not deducted from employees' pay. The District of Columbia (the "District") is solely responsible for determining whether an employee is eligible for paid leave benefits under the UPLA.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

To be eligible for paid leave benefits, an employee must have been a covered employee during some or all of the 52 calendar weeks immediately preceding the qualifying event for which paid leave is being taken. A covered employee is someone who: (a) spends more than 50% of the employee's work time for the Firm working in the District; or (b) whose employment for the Firm is based in the District, who regularly spends a substantial amount of the employee's work time for the Firm in the District, and who does not spend more than 50% of the employee's work time for the Firm in another jurisdiction.

Paid leave benefits are available for the following covered events:

- Family Leave – to care for a family member with a serious health condition;
- Medical Leave – for an employee's own serious health condition (including the occurrence of a stillbirth and the medical care related to a miscarriage);
- Parental Leave – to bond with the employee's child after the child's birth, placement of a child with an employee for adoption or foster care, or placement of a child with an employee who will legally assume and discharge parental responsibility ("Parental Leave Event"); and
- Pre-natal Leave – for covered pre-natal medical care following the diagnosis of pregnancy by a health care provider and prior to the occurrence of a Parental Leave Event.

For purposes of paid leave benefits, a family member includes the employee's: biological, adopted, or foster child, a stepchild, a legal ward, a child of a domestic partner, or a person to whom an employee stands in loco parentis; biological, foster, or adoptive parent, a parent-in-law, a stepparent, a legal guardian, or other person who stood in loco parentis to the employee when the employee was a child; a person to whom the employee is related by domestic partnership or marriage; grandparent, which means the biological, foster, adoptive, or step parent of the employee's biological, foster, adoptive, or step parent; or a sibling, which means the biological, half-, step-, adopted-, or foster-sibling or sibling-in-law of the employee.

Parental leave benefits must be used within fifty-two (52) calendar weeks of the qualifying parental leave event.

The amount of paid leave benefits that may be payable varies depending on the covered event and the date of filing for paid leave benefits, as follows.

For claims filed before October 1, 2022:

- Family Leave – up to 6 workweeks within a fifty-two (52) calendar week period
- Medical Leave – up to 6 workweeks within a fifty-two (52) calendar week period
- Parental Leave – up to 8 workweeks within a fifty-two (52) calendar week period
- Pre-natal Leave – up to 2 workweeks within a fifty-two (52) calendar week period

For claims filed on or after October 1, 2022:

- Family Leave – up to 12 workweeks within a fifty-two (52) calendar week period

- Medical Leave – up to 12 workweeks within a fifty-two (52) calendar week period
- Parental Leave – up to 12 workweeks within a fifty-two (52) calendar week period
- Pre-natal Leave – up to 2 workweeks within a fifty-two (52) calendar week period

For claims filed before October 1, 2022, the maximum amount of paid leave benefits that may be received in the aggregate, for any number of combination of leave events, within a fifty-two (52) calendar week period is 8 workweeks, except employees may take up to a total of ten (10) workweeks in a fifty-two (52) calendar week period when parental leave and pre-natal leave are combined provided that an employee may not receive any combination of pre-natal leave and medical leave for more than six (6) weeks in a fifty-two (52) calendar week period.

For claims filed on or after October 1, 2022, the maximum amount of paid leave benefits that may be received in the aggregate, for any number of combination of leave events, within a fifty-two (52) calendar week period is 12 workweeks, except when an employee receives both prenatal and parental leave, the employee can receive both prenatal and parental leave for a total leave time of up to 14 workweeks.

The amount of benefits will be calculated by the District and will depend in part on an employee's average weekly wage as reported by the Firm to the Department of Employment Services, subject to a maximum weekly benefit amount which is adjusted annually by the District.

Employees may elect to receive paid leave benefits either intermittently or continuously in increments of no less than one (1) day.

Employees that have experienced an event that may qualify for paid leave benefits may contact Human Capital for information about the District's paid leave benefits program and how to apply for benefits. Employees also can learn more about applying for benefits with the OPFL at [dcpaidfamilyleave.dc.gov](https://dcpaidfamilyleave.dc.gov).

Employees must, to the extent practicable, provide written notice of the employee's need for the use of paid leave benefits to Human Capital before taking leave. If the need is foreseeable, the eligible employees must provide written notice at least ten (10) business days in advance. If the need is not foreseeable, the eligible employees must provide notice in writing, or orally in exigent circumstances, before the start of the work shift for which the individual intends to first take time off work for a covered event. In the case of an emergency that prevents an employee from providing notice before the start of the work shift for which the employee intends to first take time off work for a covered event, the eligible employee, or another individual on behalf of the eligible employee, must notify the Firm in writing, or orally in exigent circumstances, within forty-eight (48) hours after the emergency occurs. The eligible employee, or another individual on behalf of the eligible employee, must supplement oral notice with written notice as soon as practicable. The eligible employee's written or oral notice to the Firm should include: (i) the type of covered event; (ii) the expected duration of the time off work for the covered event; (iii) the expected start and end dates of the time off work for the covered event; and (iv) whether the paid leave benefits sought will initially be used continuously or intermittently.

The UPLA does not provide job protection to employees when they take time off work and receive paid leave benefits unless they qualify for such reinstatement under federal or D.C. family and medical leave laws. Any time off for events that qualify for paid leave benefits will run concurrently with other leaves of absence, such as Family and Medical Leave/D.C. Family and Medical Leave, if applicable. Please see the Family and Medical Leave/ D.C. Family and Medical Leave policies for eligibility requirements.

The Firm prohibits retaliation against an employee for requesting or using paid leave benefits or otherwise exercising or attempting to exercise any right provided in this policy or the UPLA.

Employees with questions regarding these benefits can contact Human Capital.

## PARENTAL LEAVE

Employees who work in D.C. and are parents are entitled to a total of twenty-four (24) hours of leave during any 12-month period to attend or participate in school-related events for their children. The term “parent” for purposes of this policy includes a father or mother, a person with legal custody of a child, a guardian of a child, an aunt, uncle or grandparent, or someone who is married to any of the above.

School-related events may be sponsored by either the school or an associated organization, such as a parent-teacher association. Examples of school-related events include a concert, play or rehearsal, a sporting event, or a meeting with a teacher or counselor. A school-related event must involve the employee’s child directly as either a participant or a subject, but not as a spectator.

The Firm may deny a request for leave under this policy if the granting of the leave would disrupt the Firm’s business and make the achievement of production or service delivery unusually difficult. The leave provided by this policy is unpaid unless the parent elects to use any paid time off or other leave (not including sick leave) that has been provided by the Firm. Employees who desire to take leave under this policy must notify Human Capital at least ten (10) calendar days prior to the leave, unless the need to attend the event is unforeseeable.

# ILLINOIS SUPPLEMENT

## **DISCRIMINATION AND SEXUAL HARASSMENT FOR EMPLOYEES OUTSIDE CHICAGO (ADDENDUM TO POLICY AGAINST DISCRIMINATION AND HARASSMENT)**

In compliance with the Illinois Human Rights Act (“Act”), all employees have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act. This applies to all employer actions, including hiring, promotion, discipline and discharge.

Employees also have the right to reasonable workplace accommodations based on pregnancy and disability. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled.

It is also unlawful for employers to treat people differently or otherwise retaliate against an employee because they have reported discrimination or sexual harassment, participated in an investigation, or helped others exercise their right to complain about discrimination or sexual harassment.

Aside from the internal complaint process at the Firm, employees may choose to file a charge of discrimination or sexual harassment under the Act with the Illinois Department of Human Rights (“IDHR”). The charge process for violations of the law can be initiated by completing the form at [www.illinois.gov/dhr](http://www.illinois.gov/dhr) or by contacting the IDHR at [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov), or either of these offices:

Chicago Office  
555 W. Monroe St., 7th Floor  
Chicago, IL 60661  
(312) 814-6200  
(866) 740-3953 (TTY)  
(312) 814-6251 (Fax)

Springfield Office  
535 W. Jefferson Street, 1st Floor  
Springfield, IL 62702  
(217) 785-5100  
(866) 740-3953 (TTY)  
(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

## **DISCRIMINATION AND SEXUAL HARASSMENT FOR EMPLOYEES IN CHICAGO (ADDENDUM TO POLICY AGAINST DISCRIMINATION AND HARASSMENT)**

In compliance with the Illinois Human Rights Act (“Act”) and the City of Chicago Human Rights Ordinance (“Ordinance”), all employees have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act or Ordinance. This applies to all employer actions,

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

including hiring, promotion, discipline and discharge. Sexual harassment is illegal and the Firm expressly prohibits such actions and behavior.

Sexual harassment means any (i) unwelcome sexual advances or any unwelcome conduct of a sexual nature; or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Employees can confidentially report allegations of sexual harassment internally using the reporting procedures set forth in the general Discrimination, Harassment & Retaliation Prevention policy. Written complaints can be submitted internally using the form provided with this policy.

Employees also have the right to reasonable workplace accommodations based on pregnancy and disability. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled.

It is also unlawful for employers to treat people differently or otherwise retaliate against an employee because they have reported discrimination or sexual harassment, participated in an investigation, or helped others exercise their right to complain about discrimination or sexual harassment.

Aside from the internal complaint process at the Firm, employees may choose to file a charge/complaint of discrimination or sexual harassment with the government agency or agencies set forth below.

Illinois Department of Human Rights ("IDHR")

The charge process for violations of the law can be initiated by completing the form at [www.illinois.gov/dhr](http://www.illinois.gov/dhr) or by contacting the IDHR at [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov), or either of these offices:

Chicago Office  
555 W. Monroe St., 7th Floor  
Chicago, IL 60661  
(312) 814-6200  
(866) 740-3953 (TTY)  
(312) 814-6251 (Fax)

Springfield Office  
535 W. Jefferson Street, 1st Floor  
Springfield, IL 62702  
(217) 785-5100  
(866) 740-3953 (TTY)  
(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

Chicago Commission on Human Relations ("CCHR")

The complaint process for violations of the law can be initiated by visiting [www.chicago.gov/CCHR](http://www.chicago.gov/CCHR) or by contacting the CCHR at [cchr@cityofchicago.org](mailto:cchr@cityofchicago.org), or at:

740 N. Sedgwick Suite 400  
Chicago, IL 60654  
(312) 744-4111 (312)  
744-1088 (TTY)  
(312) 744-1081 (FAX)

Additionally, employees may choose to file a charge of discrimination or sexual harassment with the United States Equal Employment Opportunity Commission (EEOC) by contacting the EEOC at:

JCK Federal Building  
230 S Dearborn Street  
Chicago, IL 60604  
Filing of Private Sector Charges/Enforcement/  
Federal Sector Hearings: Suite 1866  
Mediation Unit/Legal Unit: Suite 2920  
1-800-669-4000  
312-588-1260 (Fax)

Employees, other than those who supervise or manage employees, are required to participate in a minimum of one hour of sexual harassment prevention training at least once a year. Anyone who supervises or manages employees is required to participate in a minimum of two hours of sexual harassment prevention training at least once a year. Additionally, all employees are required to participate in one hour of bystander training at least once a year.

## PREGNANCY ACCOMMODATIONS

The Illinois Human Rights Act is enforced by the Illinois Department of Human Rights ("IDHR"). The charge process for violations of the law can be initiated by completing the form at <http://www.illinois.gov/dhr> or by contacting the IDHR at [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov), or any of these offices:

Chicago Office  
555 W. Monroe St., 7th Floor  
Chicago, IL 60661  
(312) 814-6200  
(866) 740-3953 (TTY)  
(312) 814-6251 (Fax)

Springfield Office  
535 W. Jefferson Street, 1st Floor  
Springfield, IL 62702  
(217) 785-5100  
(866) 740-3953 (TTY)  
(217) 785-5106 (Fax)

Employees with questions or concerns regarding this policy or who would like to request an accommodation should contact Human Capital.



## LEAVE FOR DOMESTIC/SEXUAL/GENDER VIOLENCE OR OTHER CRIMES OF VIOLENCE

In accordance with the Illinois Victims' Economic Security and Safety Act ("VESSA"), employees who are the victims of domestic violence, sexual violence, gender violence or any other crime of violence, or who have family or household members who are the victims of domestic violence, sexual violence, gender violence or any other crime of violence whose interests are not adverse to the employee as it relates to the domestic violence, sexual violence, gender violence or any other crime of violence, may be eligible for up to twelve (12) weeks of unpaid leave within any 12-month period.

Employees have the option to substitute available paid time off during unpaid leave taken under this policy, but this substitution does not extend the 12-week period. Leave runs concurrently with Family and Medical Leave and therefore does not extend any unpaid time available to the employee under Family and Medical Leave.

### REASONS FOR LEAVE

Eligible employees may take leave if they are, or if a family or household member is, experiencing an incident of domestic violence, sexual violence, gender violence or any other crime of violence, so that they or a member of their family or household may:

- 1) Seek medical attention for or recover from physical or psychological injuries caused by domestic violence, sexual violence, gender violence or any other crime of violence;
- 2) Obtain services from a victim's services organization;
- 3) Obtain psychological or other counseling;
- 4) Participate in safety planning, temporary or permanent relocation, or take other actions to increase their physical safety or economic security; or
- 5) Seek legal assistance or remedies to ensure their health and safety, including preparing for or participating in any civil or criminal legal proceeding related to or derived from domestic violence, sexual violence, gender violence or any other crime of violence.

For purposes of this policy, "family or household member" means a spouse or party to a civil union, parent, grandparent, child, grandchild, sibling, or any other person related by blood or by present or prior marriage or civil union, other person who shares a relationship through a child, or any other individual whose close association with the employee is the equivalent of a family relationship as determined by the employee, and persons jointly residing in the same household.

### NOTICE AND CERTIFICATION OF THE NEED FOR LEAVE

Eligible employees must provide the Firm with at least forty-eight (48) hours advance notice of the need for leave, unless such notice is not practicable. To request leave, an employee must provide a sworn statement indicating that the employee or a family or household member is a victim of domestic violence, sexual violence, gender violence or any other crime of violence and that leave is necessary for one of the reasons described above.

The employee seeking leave also must provide supporting documentation from one of

the following sources if the employee has possession of such document: (1) a victim's services organization; (2) a member of the clergy; (3) a medical professional from which the employee or family or household member has sought assistance; (4) a police report or court record; or (5) any other corroborating evidence.

### INTERMITTENT AND REDUCED SCHEDULE LEAVE

Unpaid leave may be taken consecutively, intermittently (in separate blocks of time) or on a reduced leave schedule (reducing the usual number of hours worked per workweek or work day).

### EMPLOYEE BENEFITS

During an approved leave, the Firm will maintain the employee's health benefits as if the employee continued to be actively employed. If paid time off is substituted for unpaid leave, the Firm will deduct the employee's portion of the any applicable health plan premium as a regular payroll deduction. If the employee's leave is unpaid, the employee must make arrangements with Human Capital prior to taking leave to pay their portion of any applicable health insurance premiums each month. If the employee elects not to return to work at the end of the leave period, the employee will be required to reimburse the Firm for the cost of the health benefit premiums paid by the Firm for maintaining coverage during the unpaid leave period, unless the employee cannot return to work because of continuation, recurrence, or onset of domestic or sexual violence or other circumstances beyond the employee's control.

### PERIODIC REPORTS

During a leave, an employee must provide periodic reports (at least every thirty (30) days) regarding the employee's status and any change in the employee's plans on returning to work.

### RETURNING FROM LEAVE

Upon returning from leave, employees will be restored to the same or an equivalent position.

Employees will not be subject to discharge, harassment, or discrimination for exercising rights or attempting to exercise rights under this policy, opposing practices that they believe to be in violation of this policy, or supporting the exercise of rights of another under this policy.

For additional information on this leave, please contact Human Capital.

## FAMILY BEREAVEMENT LEAVE

An employee who is eligible for leave under the federal Family and Medical Leave Act (FMLA) may take up to two (2) weeks (10 work days) of unpaid bereavement leave for any or all of the following purposes:

- 1) to attend the funeral or alternative to a funeral of the employee's family member,
- 2) to make arrangements necessitated by the death of the employee's family member,

- 3) to grieve the death of the employee's family member; or
- 4) to be absent from work due to:
  - a. a miscarriage;
  - b. an unsuccessful round of intrauterine insemination or of an assisted reproductive technology procedure;
  - c. a failed adoption match or an adoption that is not finalized because it is contested by another party;
  - d. a failed surrogacy agreement;
  - e. a diagnosis that negatively impacts pregnancy or fertility; or
  - f. a stillbirth.

For purposes of this policy, "family member" means an employee's child, stepchild, spouse, domestic partner, sibling, parent, mother-in-law, father-in-law, grandchild, grandparent, or stepparent. "Child" includes an employee's biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis.

Leave under this policy is only available to employees who have not exhausted their FMLA leave entitlement at the time bereavement leave is requested. In the event of the death of more than one covered family member in a 12-month period, an employee may take up to a total of six (6) weeks of bereavement leave during the 12-month period.

Bereavement leave must be completed within sixty (60) days of the date on which the employee received notice of the death of the employee's family member or the occurrence of an event listed in reason number (4) above.

An employee requesting leave under this policy generally must provide the Firm with at least forty-eight (48) hours' advance notice of the intention to take bereavement leave, unless providing such notice is not reasonable and practicable under the circumstances.

Employees may substitute available paid time off while taking unpaid leave under this policy, but this substitution does not extend the length of the leave.

The Firm may require reasonable documentation in connection with leave taken under this policy. Documentation may include a death certificate, a published obituary, or written verification of death, burial, or memorial services from a mortuary, funeral home, burial society, crematorium, religious institution, or government agency. For leave resulting from an event listed under reason 4 above, reasonable documentation shall include a form, to be provided by the Department of Labor, to be filled out by a health care practitioner who has treated the employee or the employee's spouse or domestic partner, or surrogate, for an event listed under reason 4, or documentation from the adoption or surrogacy organization that the employee worked with related to an event listed under reason 4, certifying that the employee or their spouse or domestic partner has experienced an event listed under reason 4. The Firm will not require that the employee identify which category of event the leave pertains to as a condition of exercising rights under this policy.

Employees will not be subject to adverse action for exercising rights or attempting to exercise rights under this policy, opposing practices that they believe to be in violation of this policy, or supporting the exercise of rights of another under this policy.

## SEXUAL HARASSMENT COMPLAINT FORM

If you believe that you have been subjected to conduct in violation of the Firm's policy prohibiting sexual harassment you are encouraged to complete this form and submit it to Human Capital. If you are more comfortable reporting verbally or in another manner, you may do so and can follow the guidelines set forth in the Firm policy. You will not be retaliated against for filing a complaint. Once a complaint is received, the Firm will follow the investigation process described in our policy.

### GENERAL INFORMATION

Your Name / Job Title: \_\_\_\_\_

Your Department / Supervisor: \_\_\_\_\_

Preferred Communication Method (if via e-mail or phone, please provide contact info):

\_\_\_\_\_

### COMPLAINT INFORMATION

Please tell us who you believe has violated our Sexual Harassment Policy. What is their relationship to you (e.g., Supervisor, Subordinate, Co-Worker, Other):

Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

Please provide specific date(s) the alleged misconduct occurred. Additionally, please advise if the alleged misconduct is continuing?

Please list the name and contact information of any witnesses or individuals who may have information related to your complaint.

*This last question is optional, but may help the investigation*

Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# NEW JERSEY SUPPLEMENT

## FAMILY LEAVE INSURANCE BENEFITS

Employees taking time off work (i) to care for a family member with a serious health condition, (ii) to bond with a child during the first 12 months after birth or placement of the child for adoption or as a foster child, (iii) to engage in activities for which unpaid leave may be taken pursuant to the New Jersey Security and Financial Empowerment Act (NJ SAFE Act), on the employee's own behalf, if the employee is a victim of an incident of domestic violence a sexually violent offense, or to assist a family member of the individual who has been a victim of an incident of domestic violence a sexually violent offense (except for any time for which the employee receives disability benefits for a disability caused by the violence or offense), or (iv) in the event of a state of emergency declared by the Governor, or when indicated to be needed by the Commissioner of Health or other public health authority, an epidemic of a communicable disease, a known or suspected exposure to the communicable disease, or efforts to prevent spread of the communicable disease, provide in-home care or treatment of the family member of the employee required due to: (a) the issuance by a healthcare provider or the commissioner or other public health authority of a determination that the presence in the community of the family member may jeopardize the health of others; and (b) the recommendation, direction, or order of the provider or authority that the family member be isolated or quarantined as a result of suspected exposure to a communicable disease, may be eligible to receive family leave benefits through the state, which is administered by the Division of Temporary Disability Insurance, the New Jersey Department of Labor and Workforce Development.

For purposes of this policy, family member includes the employee's child (including a child conceived through a gestational carrier agreement), parent, spouse, domestic partner, civil union partner, parent-in-law, sibling, grandparent, grandchild, or any other individual related by blood to the employee, and any other individual that the employee shows to have a close association with the employee which is the equivalent of a family relationship.

These benefits are financed solely through employee contributions to the state. The state is responsible for determining if an associate is eligible for such benefits.

Employees who need to take time off work for a reason set forth above should speak to Human Capital, who will provide information about the state's family leave benefits program and how to apply for benefits. Employees also may contact the Division of Temporary Disability Insurance for further information. Employees should maintain regular contact with Human Capital during this time away from work so we may monitor employees' return-to-work status. In addition, employees should contact Human Capital when ready to return to work so we may determine what positions, if any, are open.

Employees taking time off work who receive paid family leave benefits are not guaranteed job reinstatement unless they qualify for such reinstatement under federal and/or state leave laws or other applicable laws. Any time off for family leave purposes will run concurrently with other leaves of absence, such as Family and Medical Leave Act and the New Jersey Family Leave Act and/or the NJ SAFE Act, if applicable. Please see the "Family and Medical Leave" and/or the NJ SAFE Act policies for eligibility requirements.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## NEW JERSEY FAMILY LEAVE (ADDENDUM TO FMLA POLICY)

Like the Family and Medical Leave Act (“FMLA”) Policy described elsewhere in this Handbook, the New Jersey Family Leave Act (“NJFLA”) may require employers to provide family leaves of absence for eligible employees. Either or both of these laws may apply to a leave. Where both laws apply, any leave taken will be counted under both laws at the same time. This policy will be interpreted to comply with the law(s) that apply to a particular leave. This policy provides employees information concerning any NJFLA entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this handbook. If employees have any questions concerning NJFLA leave, they should contact Human Capital.

### ELIGIBILITY

NJFLA leave is available to “NJFLA eligible employees.” To be an NJFLA eligible employee, an employee must:

- 1) Have been employed by the Firm for at least twelve (12) months;
- 2) Have worked at least 1,000 “base hours” during the 12-month period preceding the leave; and
- 3) Be employed by an employer with thirty (30) or more employees.

“Base Hours” are the hours of work for which the employee receives compensation including overtime hours and hours for which the employee receives workers’ compensation benefits.

### BASIC FAMILY AND MEDICAL LEAVE ENTITLEMENT

The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons. The NJFLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family reasons during a 24-month period. The 24-month period is determined on a “rolling” 24-month period dating back from the time the employee uses any NJFLA leave. NJFLA leave may be taken because of: (i) the birth of a child including via a surrogate or gestational carrier; (ii) the placement of a child with the employee for adoption or foster care; (iii) to care for the employee’s family member who has a serious health condition; or (iv) in the event of a state of emergency declared by the Governor, or when indicated to be needed by the Commissioner of Health or other public health authority, an epidemic of a communicable disease, a known or suspected exposure to the communicable disease, or efforts to prevent spread of a communicable disease, which: (a) requires in-home care or treatment of a child due to the closure of the school or place of care of the child of the employee, by order of a public official due to the epidemic or other public health emergency; (b) prompts the issuance by a public health authority of a determination, including by mandatory quarantine, requiring or imposing responsive or prophylactic measures as a result of illness caused by an epidemic of a communicable disease or known or suspected exposure to the communicable disease because the presence in the community of a family member in need of care by the employee, would jeopardize the health of others; or (c) results in the recommendation of a health care

provider or public health authority, that a family member in need of care by the employee voluntarily undergo self-quarantine as a result of suspected exposure to a communicable disease because the presence in the community of that family member in need of care by the employee, would jeopardize the health of others.

For purposes of NJFLA, a “family member” means a child, parent, parent-in-law, sibling, grandparent, grandchild, spouse, domestic partner, or one partner in a civil union couple, or any other individual related by blood to the employee, and any other individual that the employee shows to have a close association with the employee which is the equivalent of a family relationship.

As noted above, because the NJFLA is only a “family leave” law, employees should note that leave granted due to an employee’s own serious health condition is not covered by the NJFLA. This can result in important distinctions in the calculation of available leave. For example, because the period of leave caused by an employee’s disability due to pregnancy or childbirth is more properly classified as leave due to an employee’s own serious health condition, the Firm normally would count such time toward the employee’s FMLA allotment only. Once the period of disability due to pregnancy or childbirth has ended (i.e., employee is cleared to return to work), an employee would be eligible to use their leave under the NJFLA to care for the employee’s newborn child and run that time concurrently with any remaining FMLA leave. In instances where an employee remains disabled due to childbirth and an employee has no FMLA leave remaining, the Firm will allow employees to begin using NJFLA leave.

### INTERMITTENT LEAVE AND REDUCED LEAVE SCHEDULES

FMLA and/or NJFLA leave usually will be taken for a period of consecutive days, weeks or months. Under the NJFLA, employees may take intermittent leave for bonding with the employee’s child after birth or placement of the child for adoption or as a foster child. NJFLA also may be taken intermittently in the case of leave taken due to an epidemic of a communicable disease, a known or suspected exposure to the communicable disease, or efforts to prevent spread of the communicable disease, if: (1) the covered individual provides the Firm with prior notice of the leave as soon as practicable; and (2) the covered individual makes a reasonable effort to schedule the leave so as not to unduly disrupt the operations of the Firm and, if possible, provide the Firm, prior to the commencement of the intermittent leave, with a regular schedule of the day or days of the week on which the intermittent leave will be taken.

### EMPLOYEE RESPONSIBILITIES

Under the NJFLA, employees must provide fifteen (15) days’ advance notice of the need to take NJFLA leave when an employee requests intermittent leave to care for a family member with a serious health condition or to bond with a child after birth or placement of the child for adoption or as a foster child, unless an emergency or other unforeseen circumstance precludes prior notice. For other leave requests, the advance notice requirement remains 30 days, consistent with FMLA.

## **PROTECTION OF GROUP HEALTH INSURANCE AND OTHER BENEFITS**

If an employee is only taking NJFLA leave, the continuation requirements for group health plans under the FMLA are not applicable to group health plans covered under ERISA. Therefore, an employee who is on NJFLA only leave likely will trigger COBRA requirements due to a reduction in hours worked.

## **RESTORATION OF EMPLOYMENT AND BENEFITS**

As with FMLA leave, at the end of NJFLA leave, subject to some exceptions, employees generally have the right to return to the same or equivalent position with equivalent pay, benefits and other terms. However, unlike key employees under the FMLA who may be denied reinstatement, key employees under NJFLA may be denied NJFLA leave if: (1) the employee is a salaried employee among the highest paid 5% of employees or one of the seven (7) highest paid employees; and (2) denial of the leave is necessary to prevent substantial and grievous economic injury to the Firm's operations. The Firm will notify employees if they qualify as key employees under the NJFLA and that leave is being denied. Nonetheless, the Firm may not deny reinstatement when, in the event of a state of emergency declared by the Governor or when indicated to be needed by the Commissioner of Health or other public health authority, the family leave is for an epidemic of a communicable disease, a known or suspected exposure to a communicable disease, or efforts to prevent spread of a communicable disease. If the denial of the NJFLA leave occurs while the employee's leave already has begun, the employee must return to work within two (2) weeks.

# NEW YORK SUPPLEMENT

## SEXUAL HARASSMENT

### *(Addendum to Policy Against Discrimination and Harassment)*

#### LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Aside from the internal complaint process at the Firm, employees may choose to pursue external legal remedies with the following governmental entities.

##### State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time within three years of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to the Firm does not extend your time to file with DHR or in court. The years are counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR. DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Contact DHR at (888) 392-3644 or visit [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

##### Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.



the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a “Charge of Discrimination.” The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

#### Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they work to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 10th Floor, New York, New York 10007; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

#### Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

#### New York State Division of Human Rights Hotline

The New York State Division of Human Rights has established a toll-free confidential hotline to provide counsel and assistance to individuals who believe they are experiencing workplace sexual harassment. Employees can call the toll-free sexual harassment hotline at 1-800-HARASS-3 Monday through Friday, 9:00 AM to 5:00 PM.

## REPRODUCTIVE HEALTH DECISION MAKING DISCRIMINATION POLICY

The Company may not:

- discriminate nor take any retaliatory personnel action against an employee with respect to compensation, terms, conditions, or privileges of employment because

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of or on the basis of the employee's or dependent's reproductive health decision making, including, but not limited to, a decision to use or access a particular drug, device or medical service; or

- require an employee to sign a waiver or other document which purports to deny an employee the right to make their own reproductive health care decisions, including use of a particular drug, device, or medical service.

The Company also may not access an employee's personal information regarding the employee's or the employee's dependent's reproductive health decision making, including but not limited to, the decision to use or access a particular drug, device or medical service without the employee's prior informed affirmative written consent.

An employee may bring a civil action in any court of competent jurisdiction against the Company for any alleged violations of this policy. In any civil action alleging a violation of this policy, the court may: award damages, including, but not limited to, back pay, benefits and reasonable attorneys' fees and costs incurred to a prevailing plaintiff; afford injunctive relief against the Company if it commits or proposes to commit a violation of the provisions of this policy; order reinstatement; and/or award liquidated damages equal to 100% of the award for damages unless the Company proves a good faith basis to believe that its actions in violation of this policy were in compliance with the law.

Any act of retaliation for an employee exercising any rights granted under this policy shall subject the Company to separate civil penalties. For the purposes of this policy, retaliation or retaliatory personnel action shall mean discharging, suspending, demoting, or otherwise penalizing an employee for: making or threatening to make, a complaint to the Company, co-worker, or to a public body, that rights guaranteed under this policy have been violated; causing to be instituted any proceeding under or related to this policy; or providing information to, or testifying before, any public body conducting an investigation, hearing, or inquiry into any such violation of a law, rule, or regulation by the Company.

Employees with issues or concerns regarding this policy or who feel they have been subjected to any alleged violation of this policy should contact Sandra Wishnick, Director, Human Capital.

## NEW YORK CITY SUPPLEMENTAL GENDER DISCRIMINATION POLICY

In accordance with New York City law, the Firm prohibits discrimination in employment on the basis of gender. For purposes of this policy, gender is an individual's actual or perceived sex, gender identity, and gender expression including a person's actual or perceived gender-related self-image, appearance, behavior, expression or other gender-related characteristic, regardless of the sex assigned to that individual at birth. The Firm is dedicated to ensuring the fulfillment of this policy as it applies to all terms and conditions of employment, including recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, accommodation requests, access to programs and facilities, employee activities, and general treatment during employment. In furtherance of this policy:

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

- The Firm gives employees the option of indicating their preferred name, pronoun and gender, title regardless of the individual's sex assigned at birth, anatomy, gender, medical history, appearance, or the sex indicated on the individual's identification except in the limited circumstance where federal, state, or local law requires otherwise (e.g., for purposes of employment eligibility verification with the federal government). This also applies to the Firm's systems which do not limit such identifications to male and female only.
- All employees and other individuals are permitted to use single gender facilities consistent with their gender identity, regardless of their sex assigned at birth, anatomy, medical history, appearance, or the sex indicated on their identification. To the extent possible, the Firm provides single-occupancy restrooms and provides space within multi-user facilities for individuals with privacy concerns, but will not require use of a single-occupancy bathroom because an individual is transgender or gender nonconforming.
- The Firm's dress code and grooming standards are gender neutral, and therefore do not differentiate or impose restrictions or requirements based on gender.
- The Firm benefit plans apply equally to all employees regardless of gender and do not provide health benefit plans that exclude coverage for transgender care, also known as transition-related care or gender-affirming care.
- The Firm evaluates all requests for accommodations for disability or other request for changes to the terms and conditions of an individual's employment, or participation in a program offered by the Firm, which may include additional medical or personal leave or schedule changes in a fair and non-discriminatory manner without regard to gender. To that end, the Firm will treat leave requests to address medical or health care needs related to an individual's gender identity in the same manner as requests for all other medical conditions and will provide reasonable accommodations to individuals undergoing gender transition, including medical leave for medical and counseling appointments, surgery and recovery from gender affirming procedures, surgeries and treatments as they would for any other medical condition.
- Employees who engage with the public as part of their job duties are required to do so in a respectful, non-discriminatory manner by respecting gender diversity and ensuring that members of the public are not subject to discrimination (including discrimination with respect to single-sex programs and facilities).

Employees with issues or concerns regarding gender discrimination or who feel they have been subjected to such discrimination can contact the Chief Human Capital Officer, Adrienne Filipov, at (212) 878-9242. The Firm prohibits and does not tolerate retaliation against employees who report issues or concerns of gender discrimination pursuant to this policy in good faith.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## BLOOD DONATION LEAVE

In accordance with New York Labor Law, the Firm will provide employees who work in New York at least twenty (20) hours per week up to three (3) hours of unpaid leave in any calendar year to donate blood.

Employees must provide their manager with reasonable notice of their intention to participate in a blood drive. If the blood drive is at an offsite location, employees must provide at least three (3) days advance notice. If the blood drive is onsite, employees must provide at least two (2) days advance notice.

The Firm fully supports the use of this leave to make a blood donation. We will not tolerate any form of retaliation against an employee for requesting or using leave to donate blood.

## NEW YORK CITY TEMPORARY SCHEDULE CHANGE

Employees who work eighty (80) or more hours in New York City in a calendar year and have been employed by the Firm for one hundred twenty (120) or more days are eligible for two (2) temporary changes to their work schedules each calendar year for certain "personal events."

A temporary schedule change may last up to one (1) business day on two (2) separate occasions or up to two (2) business days on one (1) occasion each calendar year. A business day is any twenty-four (24) hour period during which an employee is required to work any amount of time. A temporary change means an adjustment to an employee's usual schedule including in the hours, times or locations an employee is expected to work. The change can include: using short-term unpaid leave, paid time off, working remotely, or swapping or shifting working hours with a co-worker. The Firm has the option of granting unpaid leave in lieu of the temporary change requested by the employee.

A "personal event" includes the following:

- The need to care for a child under the age of 18 for whom the employee provides direct and ongoing care.
- The need to care for an individual ("care recipient") with a disability who is a family member or who resides in the caregiver's household for whom the employee provides direct and ongoing care to meet the needs of daily living and.
- The need to attend a legal proceeding or hearing for public benefits to which the employee, a family member, or the employee's minor child or care recipient is a party.
- Any other reason for which the employee may use leave under NYC's Paid Safe and Sick Leave Law.

For purposes of this policy a "family member" includes: a child (biological, adopted, or foster child; legal ward; child of an employee standing in loco parentis); a grandchild; a spouse (current or former regardless of whether they reside together); a domestic partner (current or former regardless of whether they reside together); a parent; a grandparent;

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a child or parent of an employee's spouse or domestic partner; a sibling (including a half, adopted, or step sibling); any other individual related by blood to the employee; and any individual whose close association with the employee is the equivalent of family.

Request for a temporary schedule change must be made orally or in writing to the Firm or the employee's direct supervisor as soon as practicable after the employee becomes aware of the need for the change. The request should include:

- The date of the temporary schedule change;
- That the change is due to a personal event; and
- Proposed type of temporary schedule change (unless the employee would like to use leave without pay).

The Firm will respond immediately to such requests. Assuming the employee has not exceeded the number of allowable requests and the request is for a qualifying reason, the Firm will either approve the proposed type of temporary schedule change or provide leave without pay. The Firm also may offer employees the ability to elect to use paid time off. Employees will not be required to use leave under NYC's Paid Safe and Sick Leave Law for a temporary schedule change.

If the employee requested the schedule change orally (for example, in person or by phone), the employee must submit a written request no later than the second business day after the employee returns to work. The employee should include in the written request the date of the temporary schedule change and that the change was due to a personal event. The Firm will provide a written response to any written request for temporary schedule change within fourteen (14) days. The response will include:

- If the request was granted or denied
- How the request was accommodated (if granted) or the reason for denial (if denied)
- Number of requests the employee has made for temporary schedule changes
- How many days the employee has left in the year for temporary schedule changes

Employees have the right to temporary schedule changes and may file a complaint for alleged violations of this policy and applicable law with the New York City Department of Consumer and Workforce Protection. The Firm prohibits retaliation or the threat of retaliation against an employee for exercising or attempting to exercise any right provided in this policy and applicable law, or interference with any investigation, proceeding or hearing related to or arising out of the employee's rights pursuant to this policy and applicable law.

Employees with questions concerning this policy should contact Human Capital.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## NEW YORK CITY REASONABLE ACCOMMODATIONS AND COOPERATIVE DIALOGUE POLICY

The Firm is committed to complying with applicable federal, state and local laws governing reasonable accommodations of individuals. To that end, we will endeavor to make a reasonable accommodation to applicants and employees who have requested an accommodation or for who the Firm has notice may require such an accommodation, without regard to any protected classifications, related to an individual's: (i) disability, meaning any physical, medical, mental, or psychological impairment, or a history or record of such impairment; (ii) sincerely held religious beliefs and practices; (iii) needs as a victim of domestic violence, sex offenses or stalking; (iv) needs related to pregnancy, childbirth or related medical conditions; and/or (v) any other reason required by applicable law, unless the accommodation would impose an undue hardship on the operation of our business.

Any individual who would like to request an accommodation based on any of the reasons set forth above should contact Human Capital. Accommodation requests can be made in writing using a form which can be obtained by Human Capital or found on the Firm's intranet under the Human Capital section. If an individual who has requested an accommodation has not received an initial response within five (5) business days, the individual should contact the Chief Human Capital Officer.

After receiving a request for an accommodation or learning indirectly that an individual requires such an accommodation, the Firm will engage in a cooperative dialogue with the individual. Even if an individual has not formally requested an accommodation, the Firm may initiate a cooperative dialogue under certain circumstances, such as when the Firm has knowledge that an individual's performance at work has been negatively affected and a reasonable basis to believe that the issue is related to any of the reasons set forth above, in compliance with applicable law. In the event the Firm initiates a cooperative dialogue with an individual, it should not be construed as the Firm's belief an individual requires an accommodation, but will serve as an invitation for the individual to share with the Firm any information the individual desires to share, or to request an accommodation.

The cooperative dialogue may take place in person, by telephone, or by electronic means. As part of the cooperative dialogue, the Firm will communicate openly and in good faith with the individual in a timely manner in order to determine whether and how the Firm may be able to provide a reasonable accommodation. To the extent necessary and appropriate based on the request, the Firm will attempt to explore the existence and feasibility of alternative accommodations as well as alternative positions for the individual. The Firm is not required to provide the specific accommodation sought by an individual, provided the alternatives are reasonable and either meet the specific needs of the individual or specifically address the individual's limitations.

As part of the cooperative dialogue, the Firm reserves the right to request medical documentation from an individual where the reason for the accommodation is due to a physical or mental disability or needs related to pregnancy, childbirth or related medical conditions, to the maximum extent permitted by applicable law. Specifically, where the

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reason for the accommodation is due to needs related to pregnancy, childbirth or related medical conditions requests for medical documentation will be limited to the following circumstances:

1. When an individual requests time away from work, including for medical appointments, other than time off requested during the six (6) to eight (8) week period following childbirth (for recovery from childbirth) or
2. When an individual requests to work from home, either on an intermittent basis or a longer-term basis.

If the Firm believes that the provided documentation is insufficient, and before denying the request based on insufficient documentation, the Firm reserves the right to request additional documentation from the individual or, upon the individual's consent, speak with the health care provider who provided the documentation. As applicable, an employee whose time off is covered by the Family Medical Leave Act (FMLA) may also be required to provide medical documentation, depending on the circumstances of the leave request, pursuant to federal law.

At the conclusion of the cooperative dialogue, the Firm will provide written notice to the individual in a timely manner indicating that the Firm is granting or denying a reasonable accommodation.

Where a reasonable accommodation is being granted, written notice to the individual will indicate that either the Firm:

1. will be able to offer and provide a reasonable accommodation as requested, or
2. will be able to offer and provide an alternative reasonable accommodation.

Where a reasonable accommodation is being denied, written notice to the individual will indicate one or more of the following:

1. an accommodation would not meet the requested need,
2. an accommodation would cause an undue hardship on the Firm's operations,
3. documentation of the need for the accommodation was inadequate,
4. an accommodation would require removal of an essential requisite of the job,
5. an accommodation would pose a direct threat, and/or
6. any other basis for denying an accommodation

The Firm will endeavor to keep communications regarding requests for reasonable accommodations and all circumstances surrounding an individual's underlying reason for needing an accommodation confidential.

We will not allow any form of retaliation against individuals who have requested an accommodation, for who the Firm has notice may require such an accommodation or who otherwise engage in the cooperative dialogue process.

Individuals with questions regarding this policy should contact Human Capital.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## NEW YORK CITY LACTATION ROOM ACCOMMODATION POLICY

Pursuant to New York City law, employees have a right to request access to a lactation room for purposes of expressing breast milk. The New York Office provides a Quiet Room, located on the 34th floor (34.62 space), that can be used as a lactation room.

For purposes of this policy, the term lactation room means a sanitary place, other than a restroom, that can be used to express breast milk shielded from view and free from intrusion and that includes at minimum an electrical outlet, a chair, a surface on which to place a breast pump and other personal items, and nearby access to running water. Unless doing so poses an undue hardship, the Company will provide (i) a lactation room in reasonable proximity to the employee's work area and (ii) a refrigerator suitable for breast milk storage in reasonable proximity to such employee's work area. If the room designated by the Company to serve as a lactation room is also used for another purpose, the sole function of the room will be as a lactation room while an employee is using the room to express breast milk. While an employee is using the room to express milk, the Company will provide notice to other employees that the room is given preference for use as a lactation room.

Employees can schedule their designated time to express milk by using the sign-up sheet located in the Quiet Room. If two or more employees need to use the room at the same time for lactation purposes, the employees should contact Sandra Wishnick so that arrangements can be made to ensure all employees are provided with access to the room. In such instances, the Company will endeavor to accommodate all employees involved such as by requesting that the employees adjust their desired times for use of the lactation room and when this is not feasible the Company may follow a chronological order based on timing of receipt of the request. The Company will respond to such requests within five (5) business days. The Company will provide reasonable break time for an employee to express breast milk pursuant to section 206-c of the labor law.

The Firm will not tolerate discrimination or harassment against any employee based on the request for or usage of lactation accommodations. Any discrimination, harassment, or other violations of this policy can be reported to Human Capital.

Employees can contact Sandra Wishnick with questions regarding this policy.

## NEW YORK STATE PAID FAMILY LEAVE

### ELIGIBILITY REQUIREMENTS

Two groups of employees are eligible for paid family leave ("PFL"):

#### Group 1

- Employees that have a regular work schedule of 20 or more hours per week; and
- have been employed for at least 26 consecutive weeks prior to the start of any requested PFL.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## Group 2

- Employees that have a regular work schedule of less than 20 hours per week; and
- have worked at least 175 days in total prior to the date any requested PFL begins.

Paid time off can be counted toward an employee's eligibility determination. Employees are eligible for PFL regardless of citizenship and/or immigration status.

### ELIGIBLE REASONS FOR TAKING PFL

PFL is available for any of the following reasons:

- to participate in providing care, including physical or psychological care, for the employee's family member (child, spouse, domestic partner, parent, grandchild, grandparent or sibling (effective 1/1/23) as each of such family members are defined under applicable law) ) with a serious health condition (as defined at the end of this policy); or
- to bond with the employee's child during the first twelve months after the child's birth, adoption or foster care placement; or
- for qualifying exigencies, as interpreted by the Family and Medical Leave Act (FMLA), arising out of the fact that the employee's spouse, domestic partner, child, or parent is on active duty (or has been notified of an impending call or order to active duty) in the armed forces of the United States.

Leave may not be taken for any one, or for a combination of, the following reasons: (i) for a birth mother's pregnancy or prenatal conditions; (ii) for an employee's own health condition; and/or; (iii) for an employee's own qualifying military event.

### ENTITLEMENT – DURATION, BENEFITS, AND JOB PROTECTION

#### Duration

PFL is available to eligible employees for up to twelve (12) weeks within any 52 consecutive week period\*.

*\* The 52 consecutive week period is determined retroactively with respect to each day for which PFL benefits are currently being claimed.*

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently in increments of at least one full day or on a reduced leave schedule, except that an employee may only take intermittent or reduced leave to care for a family member with a serious health condition where it is shown to be medically necessary. Employees must make reasonable efforts to schedule intermittent or reduced leave so as not to unduly disrupt the Firm's operations. Leave taken on an intermittent or reduced leave schedule will not result in a reduction of the total amount of leave to which an employee is entitled beyond the amount of leave actually taken.

#### Benefits

PFL benefits are financed solely through employee contributions via payroll deductions.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

The weekly monetary will be 67% of the employee's average weekly wage or 67% of the state average weekly wage, whichever is less.

The Firm and an employee may agree to allow the employee to supplement PFL benefits up to their full salary with paid time off, to the maximum extent permitted by applicable law.

An employee who is eligible for both statutory short-term disability benefits and PFL during the same period of 52 consecutive calendar weeks may not receive more than 26 total weeks of disability and PFL benefits during that period of time. Statutory short-term disability benefits and PFL benefits may not be used concurrently. If an employee is unable to work and qualifies for workers' compensation benefits, the employee may not use PFL benefits at the same time the employee is receiving workers' compensation benefits. An employee receiving reduced earnings may be eligible for PFL.

During any PFL taken pursuant to this policy, the Firm will maintain coverage under any existing group health insurance benefits plan as if the employee had continued to work, however, payroll deductions for benefits cannot be made from PFL salary payments. As such, if an employee is taking PFL which is not concurrent with another leave which provides full salary continuation and from which benefit contributions can be deducted, the employee must make arrangements with Human Capital prior to taking leave to pay the portion of any applicable health insurance premiums which would normally be deducted from your paycheck via payroll each month.

The Firm's obligation to maintain health insurance coverage ceases if an employee's contribution payment is more than 30 days late. If an employee's payment is more than 15 days late, the Firm will send a letter notifying the employee that coverage will be dropped on a specified date unless the co-payment is received before that date.

#### Job Protection

Any employee who exercises the employee's right to PFL will, upon the expiration of that leave, be entitled to be restored to the position held by the employee when the leave commenced, or to a comparable position with comparable benefits, pay, and other terms and conditions of employment. The taking of leave covered by PFL will not result in the loss of any employment benefit accrued prior to the date on which the leave commenced.

### EMPLOYEE RESPONSIBILITIES

An employee must provide thirty (30) days' advance notice before the date leave is to begin if the qualifying event is foreseeable. When thirty (30) days' notice is not practicable for reasons such as lack of knowledge of approximately when leave will be required to begin, a change in circumstances, or a medical emergency, the employee must provide notice as soon as practicable and generally must comply with the Firm's normal call-in procedures. Failure by the employee to provide (30) days' advance notice of a foreseeable event may result in partial denial of the employee's benefits for a period of up to thirty (30) days from the date notice is provided.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.



Employees must provide sufficient information to make the Firm aware of the qualifying event and the anticipated timing and duration of the leave. Employees must specifically identify the type of family leave requested. Employees also must provide medical certifications and periodic recertification or other supporting documentation or certifications supporting the need for leave. An employee requesting paid family leave must submit a completed Request for Paid Family Leave or PFL-1 form and additional certification form(s) as follows to Unum: our PFL administrator, (1) Bonding Certification: PFL-2 Form plus documentation; (2) Health Care Provider Certification: PFL-4 Form plus Personal Health Information (PHI) Release (PFL-3 Form); or (3) Military Qualifying Event: PFL-5 Form plus documentation.

#### LEAVE CONCURRENT WITH FMLA

The Firm will require an employee who is entitled to leave under both the FMLA and PFL, to take PFL concurrently with any leave taken pursuant to the FMLA and/or any Warburg Pincus Parental Leave. When the total hours taken for FMLA in less than full-day increments reaches the number of hours in an employee's usual workday, the Firm may deduct one (1) day of PFL from an employee's annual available PFL.

#### DEFINITION OF A SERIOUS HEALTH CONDITION

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves: (a) inpatient care in a hospital, hospice or residential health care facility; or (b) continuing treatment or continuing supervision by a health care provider. Subject to certain conditions, the continuing treatment or continuing supervision requirement may be met by a period of incapacity of more than three (3) consecutive full days during which a family member is unable to work, attend school, perform regular daily activities or is otherwise incapacitated due to illness, injury, impairment or physical or mental conditions, and any subsequent treatment or period of incapacity relating to the same condition, that also involves: (a) treatment two or more times by a health care provider; or (b) treatment on at least one occasion by a health care provider, which results in a regimen of continuing treatment under the supervision of the health care provider. The continuing treatment or continuing supervision requirement also may be met by any period during which a family member is unable to work, attend school, perform regular daily activities, or is otherwise incapacitated due to a chronic serious health condition or an illness, injury, impairment, or physical or mental condition for which treatment may not be effective. A chronic serious health condition is one which: (a) requires periodic visits for treatment by a health care provider; (b) continues over an extended period of time (including recurring episodes of a single underlying condition); and (c) may cause episodic rather than a continuing period of incapacity. Examples of such episodic incapacity include but are not limited to asthma, diabetes, and epilepsy. Other conditions may meet the definition of continuing treatment.

If employees have any questions regarding this policy, they should contact Human Capital.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## PAYCHECK

#### FUNDING NEW YORK PAID FAMILY LEAVE (PFL)

The Firm is required by law to make deductions for Social Security, federal income tax, any other appropriate taxes, as well as for the New York Paid Family Leave benefit.

PFL benefits will be financed solely through employee contributions via payroll deductions. Employee contributions for 2022 will be 0.511% of an employee's weekly wage and total contributions are capped at an annual maximum of \$423.71. This deduction amount is subject to change each year.

#### PFL WAIVERS

An employee has the option to file a waiver of PFL and therefore not be subject to deductions when the employee's regular employment is:

- 20 or more hours per week but the employee will not work 26 consecutive weeks; or
- less than 20 hours per week and the employee will not work 175 days in a 52 consecutive week period.

## ENFORCEMENT AND RETALIATION OF PAID SICK AND SAFE TIME

Employees have the right to request and use paid safe/sick time and may file a complaint for alleged violations of this policy with the New York City Department of Consumer and Workforce Protection or the New York State Department of Labor. The Company prohibits retaliation or the threat of retaliation against an employee for exercising or attempting to exercise any right provided in this policy, or interference with any investigation, proceeding or hearing related to or arising out of employee's rights pursuant to this policy and applicable law.

To the extent any applicable paid sick time local office ordinance provides any greater rights than set forth in this policy, such provisions are incorporated by reference for covered employees.

Employees with questions concerning this policy should contact Human Capital.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.



# SEXUAL HARASSMENT COMPLAINT FORM

If you believe that you have been subjected to conduct in violation of the Firm's Sexual Harassment Policy you are encouraged to complete this form and submit it to Human Capital. If you are more comfortable reporting verbally or in another manner, you may do so and can follow the guidelines set forth in the Firm policy. You will not be retaliated against for filing a complaint. Once a complaint is received, the Firm will follow the investigation process described in our policy.

## GENERAL INFORMATION

Your Name / Job Title: \_\_\_\_\_

Your Department / Supervisor: \_\_\_\_\_

Preferred Communication Method (if via e-mail or phone, please provide contact info):  
\_\_\_\_\_

## COMPLAINT INFORMATION

Please tell us who you believe has violated our Sexual Harassment Policy. What is their relationship to you (e.g., Supervisor, Subordinate, Co-Worker, Other):

Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

Please provide specific date(s) the alleged misconduct occurred. Additionally, please advise if the alleged misconduct is continuing?

Please list the name and contact information of any witnesses or individuals who may have information related to your complaint.

*This last question is optional, but may help the investigation*

Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

# NY STATE AIRBORNE INFECTIOUS DISEASE EXPOSURE PREVENTION PLAN

On September 6, 2021, Governor Hochul designated COVID-19 as a “highly contagious communicable disease that presents a serious risk of harm to the public health” under the NY HERO Act. Governor Hochul largely attributed the designation to the continued spread of the Delta variant. This Infectious Disease Prevention Plan has been reviewed and updated in response to Governor Hochul’s designation.

## I. RESPONSIBILITIES

This plan applies to all employees of Warburg Pincus LLC at the following work sites:

**New York Office**  
Warburg Pincus LLC  
450 Lexington Ave  
New York, NY 10017  
United States

To ensure compliance with all plan elements aimed at preventing the spread of infectious disease, the following supervisory employee(s) are designated to enforce compliance with the plan and will act as the designated contacts unless otherwise noted in this plan:

| Name                | Title   | Location | Phone        |
|---------------------|---|----------|--------------|
| Steven G. Glenn     | Managing Director, Chief Financial Officer, Chief Operating Officer | NY       | 212-878-9303 |
| Adrienne C. Filipov | Managing Director, Chief Human Capital Officer                      | NY       | 212-878-9242 |
| Sandra Wishnick     | Director, Human Capital   | NY       | 212-878-9232 |

## II. EXPOSURE CONTROLS DURING THE COVID-19 DESIGNATED OUTBREAK

### A. MINIMUM CONTROLS DURING THE OUTBREAK

During the COVID-19 outbreak, the following minimum controls will be used in all areas of the worksite:

1. General Awareness: Even if vaccinated against COVID-19, individuals may not be aware that they have the infectious disease and can spread it to others. Employees should remember to:
- Maintain physical distancing wherever possible;
  - Exercise coughing/sneezing etiquette;
  - Wear face coverings in accordance with CDC guidance; see section A4 for the guidance for a fully vaccinated workplace.
  - Limit what they touch;
  - Stop social etiquette behaviors such as hugging and hand shaking; and
  - Wash hands properly and often.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

- 2. “Stay at Home Policy”: Employees who develop symptoms of COVID-19 are not permitted to be in the workplace. Employees should inform the designated contact and follow New York State Department of Health (NYSDOH) and Centers for Disease Control and Prevention (CDC) guidance regarding obtaining medical care and isolating.
- 3. Health Screening: Employees should self-screen for symptoms of COVID-19 at the beginning of each workday if they are coming into the workplace on that day. Employees are to self-monitor throughout their workday and report any new or emerging signs or symptoms of COVID-19 to the designated contact. Employees showing signs or symptoms of COVID-19 should leave the workplace immediately and should contact a healthcare professional, their supervisor, and the human capital team before returning to the workplace.
- 4. Face Coverings: Face coverings, if worn, must cover the nose and mouth, and fit snugly, but comfortably, against the face. The face coverings must be kept clean and sanitary and changed when soiled, contaminated, or damaged.
- 5. Physical Distancing: Physical distancing must be followed as much as feasible. Avoid unnecessary gatherings and maintain a distance of at least six feet (from each other. A face covering is required when physical distance cannot be maintained.

In situations where prolonged close contact with other individuals is likely, Warburg may institute the following control methods as appropriate and will communicate with colleagues on what has been implemented:

- Restricting or limiting customer or visitor entry;
  - Limiting occupancy;
  - Allowing only one person at a time inside small enclosed spaces with poor ventilation;
  - Reconfiguring workspaces;
  - Physical barriers (Plexiglass dividers already in place around external cubes and shared offices);
  - Signage;
  - Floor markings;
  - Telecommuting;
  - Remote meetings;
  - Preventing gatherings;
  - Restricting travel;
  - Creating new work schedules and/or staggering work hours;
  - Adjusting break times and lunch periods; and
  - Any other control methods recommended by the NYSDOH or CDC for COVID-19.
6. Hand Hygiene: To prevent the spread of infection, employees must wash hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol to clean hands BEFORE and AFTER:
- Touching your eyes, nose, or mouth;
  - Touching your mask;
  - Entering and leaving a public place; and

- Touching an item or surface that may be frequently touched by other people, such as door handles, tables, gas pumps, shopping carts, or electronic cashier registers/screens.
- Because hand sanitizers are less effective on soiled hands, employees must wash their hands rather than using hand sanitizer when their hands are soiled.

7. Cleaning and Disinfection: See Section V of this plan.
8. “Respiratory Etiquette”: Because infectious diseases can be spread by droplets expelled from the mouth and nose, employees must exercise appropriate respiratory etiquette by covering their nose and mouth with a tissue, cloth, or crook of the arm when sneezing, coughing, or yawning.
9. Special Accommodations for Individuals with Added Risk Factors: Some employees, due to age, underlying health condition, or other factors, may be at increased risk of severe illness if infected. Please submit an accommodation request to the Accommodation Committee if you believe you fall into this group.

**B.ADVANCED CONTROLS DURING AN OUTBREAK**

For activities where the Minimum Controls alone will not provide sufficient protection for employees, Warburg will determine if the following are necessary and communicate if any of them are enacted:

- 1. Elimination: Temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for employees.
- 2. Engineering Controls: Appropriate controls to contain and/or remove the infectious agent, prevent the agent from being spread, or isolate the worker from the infectious agent.

Subject to changes based on operations and circumstances surrounding COVID-19, engineering controls that are anticipated to be used are listed in the following table:

| Engineering Controls Utilized/Location:   |
|---|
| Warburg’s central Air Handling Units (AHUs) are in good condition and utilize high efficiency, MERV-15 filters. Subject to guidance from the NYSDOH and CDC, Warburg will reexamine its engineering controls and consider, installing automatic disinfection systems (e.g., ultraviolet light disinfection systems), and cleanable barriers as well as changing the building layout to avoid points where employees may congregate. |

3. “Administrative Controls” are policies and work rules used to prevent exposure.

Subject to changes based on operations and circumstances surrounding the infectious disease, the following specific administrative controls could be used if appropriate. All colleagues will be informed if any of these are put into place:

**Administrative Controls Utilized/Location:**

- Limiting the use of shared offices;
- Disinfecting procedures per NYSDOH and CDC guidance;
- Training for employees per NYSDOH and CDC guidance;
- Identifying and prioritizing job functions that are essential for continuous operations;
- Cross-training employees to ensure critical operations can continue during employee absence;
- Posting signs reminding employees of respiratory etiquette, masks, and handwashing;
- Providing clearly designated entrances and exits; and
- Staggering employees’ work schedules.

4. Personal Protective Equipment (PPE) are devices like eye protection, face shields, respirators, and gloves that protect the wearer from infection. If PPE is required, PPE will be provided, used, and maintained in a sanitary and reliable condition at no cost to employees.

**PPE Required-Activity Involved/Location:**

Warburg will provide employees PPE that complies with the OSHA Respiratory Protection Standard (29 CFR 1910.134) or temporary respiratory protection requirements OSHA permits during the infectious disease outbreak. Warburg will provide appropriate training in compliance with OSHA standards.

**C. EXPOSURE CONTROL READINESS, MAINTENANCE, AND STORAGE:**

Face coverings and respirators will be obtained, properly stored, and maintained so that they are ready for immediate use. Any applicable expiration dates will be properly considered.

**III. HOUSEKEEPING DURING A DESIGNATED OUTBREAK**

**A. Disinfection Methods and Schedules**

Objects that are touched repeatedly by multiple individuals, such as door handles, light switches, control buttons/levers, dials, levers, water faucet handles, computers, phones, or handrails will be cleaned frequently with an appropriate disinfectant. Surfaces that are handled less often, or by fewer individuals, may require less frequent disinfection.

The disinfection methods and schedules selected will be based on specific workplace conditions.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

**B. Adjustments to Normal Housekeeping Procedures**

Normal housekeeping duties and schedules will continue to be followed during an infectious disease outbreak, to the extent practicable and appropriate consistent with NYSDOH and/or CDC guidance in effect at the time. However, routine procedures may need to be adjusted and additional cleaning and disinfecting may be required.

Housekeeping staff may be at increased risk because they may be cleaning many potentially contaminated surfaces. Some housekeeping activities, like dry sweeping, vacuuming, and dusting, can re-suspend into the air particles that are contaminated with the infectious agent. For that reason, alternative methods and/or increased levels of protection may be considered and implemented.

**C. If an employee develops symptoms of the infectious disease at work, the area will be isolated in accordance with the guidance issued by the NYSDOH or CDC, before cleaning and disinfecting the sick employee’s work area.**

**D. As feasible, liners will be used in trash containers. Employees should not forcefully squeeze the air out of the trash bags before tying them closed. Trash containers may contain soiled tissue or face coverings.**

**IV. INFECTION RESPONSE DURING A DESIGNATED OUTBREAK**

If an actual, or suspected, COVID-19 case occurs at work, Warburg will take the following actions:

- Instruct the sick individual to wear a face covering (if not already wearing one), leave the worksite immediately, and inform their supervisor and the human capital team for instructions.
- Follow local and state authority guidance to inform impacted individuals.

**V. TRAINING AND INFORMATION DURING A DESIGNATED OUTBREAK**

**A. The supervisory employees set forth in Section I of this plan will verbally inform all employees of the existence and location of this plan, the fact that it has been activated in response to the COVID-19 pandemic and the resulting workplace policies and protocols that must be implemented, the infectious disease standard, employer policies, and employee rights under the HERO Act.**

**B. When this plan is activated, all personnel will receive training which will cover all elements of this plan and the following topics:**

1. The signs and symptoms of COVID-19;
2. How the disease can be spread;
3. An explanation of this plan;
4. The activities and locations at our worksite that may involve exposure to the infectious agent;
5. The use and limitations of exposure controls; and
6. A review of the standard, including employee rights provided under Labor Law, Section 218-B.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

C.The training will be:

- 1. Provided at no cost to employees and take place during working hours. If training during normal work hours is not possible, employees will be compensated for the training time (with pay or time off);
- 2. Appropriate in content and vocabulary to your educational level, literacy, and preferred language; and
- 3. Verbally provided in person or through telephonic, electronic, or other means.

VI. PLAN EVALUATIONS DURING A DESIGNATED OUTBREAK

The employer will review and revise the plan periodically, upon activation of the plan, and as often as needed to keep up-to-date with current requirements. The plan revisions, if any, are documented below.

| Plan Revision History |              |               |             |
|-----------------------|--------------|---------------|-------------|
| Date                  | Participants | Major Changes | Approved By |
|                       |              |               |             |
|                       |              |               |             |
|                       |              |               |             |
|                       |              |               |             |

VII. RETALIATION PROTECTIONS AND REPORTING OF ANY VIOLATIONS

Warburg and its agents (or any person acting as, or on behalf of, Warburg) will not discriminate, threaten, retaliate against, or take adverse action against any employee for exercising their rights under this plan, including reporting conduct the employee reasonably believes in good faith violates the plan or airborne infectious disease concerns to Warburg or government agencies/officials, or for refusing to work where an employee reasonably believes in good faith that such work exposes him or her, other workers, or the public to an unreasonable risk of exposure, provided the employee, another employee, or representative has notified Warburg verbally or in writing (including electronic communication) of the inconsistent working conditions and Warburg failed to cure, or if Warburg knew or should have known of the consistent working conditions. Employees should report any violations of this plan and its anti-retaliation provisions to Human Capital.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

# OREGON SUPPLEMENT

## **DISCRIMINATION AND HARASSMENT (ADDENDUM TO POLICY AGAINST DISCRIMINATION AND HARASSMENT)**

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to discrimination or harassment (including conduct that constitutes sexual assault), the employee may file a formal complaint with the Equal Employment Opportunity Commission, the Oregon Bureau of Labor and Industries, or in a court of law. A claim alleging discrimination or harassment (including conduct that constitutes sexual assault) prohibited by Oregon law, must be filed no later than five years after the occurrence of the alleged conduct.

Under Oregon law, employers may not require or coerce an employee to enter into a nondisclosure or nondisparagement agreement that has the purpose or effect of preventing an employee from disclosing or discussing conduct that constitutes unlawful discrimination or harassment (including conduct that constitutes sexual assault) that occurred between employees in the workplace or at a work-related event, or between employees and the employer at or away from the workplace. Any employee claiming to be the victim of discrimination or harassment (including conduct that constitutes sexual assault) may voluntarily request to enter into a nondisclosure or nondisparagement agreement. Any employee who voluntarily enters into a nondisclosure or nondisparagement agreement shall have seven days to revoke the agreement.

Employers and employees are advised to document any incidents involving discrimination or harassment (including conduct that constitutes sexual assault) as defined by Oregon law.

## **BREAKS & MEAL PERIODS (FOR NON-EXEMPT EMPLOYEES)**

### **REST BREAKS**

Non-exempt employees who work at least two (2) hours per workday are required to take one (1) 10-minute rest break for every four hours or major part thereof (two hours and one minute through four hours) worked in one work period. For purposes of this policy, “major fraction” means any time greater than two (2) hours. For example, if an employee works more than six (6) hours, but no more than ten (10) hours in a workday, the employee is required to take two (2) 10-minute rest breaks: one during the first half of the shift and a second rest break during the second half of the shift. If an employee works more than ten (10) hours but no more than fourteen (14) hours in a day, the employee is required to take three (3) 10-minute rest breaks, and so on.

Rest breaks should be taken approximately the middle of each work period of four hours or major fraction thereof as is feasible. Employees are paid for all rest break periods and do not need to clock out when taking a rest break. Rest breaks may not be added to the usual meal period or deducted from the beginning or end of the work period to reduce the overall length of the total work period. Each rest break must be a separate break, meeting

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

the requirements described above. If any work is performed during a rest break, or if the rest break is interrupted for any work-related reason, the employee is entitled to another uninterrupted paid rest break.

Employees are required to take all rest breaks, and employees who refuse to do so will be subject to discipline, up to and including termination.

**MEAL PERIODS**

Non-exempt employees who work more than six (6) hours in a workday are required to take an unpaid, off-duty and uninterrupted meal period of at least thirty (30) minutes. No meal period is required if the work period is less than 6 hours. For employees who work a shift of seven hours or less, the meal break must occur between the second and fifth hours of the shift. For employees who work more than seven hours, the break must take place between the third and sixth hours of the shift. Employees are responsible for scheduling their own meal period but should confirm them with their supervisor(s).

When scheduling meal periods, employees should try to anticipate their workflow and deadlines. During a meal period, employees are relieved of all duties and should not work during this time. When taking a meal period, employees should completely stop working for at least thirty (30) continuous minutes. Employees are prohibited from working “off the clock” during their meal period.

Those employees who use a time clock must clock out for their meal periods. Employees are required to clock back in and promptly return to work at the end of any meal period. Employees who record their time manually must accurately record their meal periods by recording the beginning and end of each work period. Employees are to immediately notify Human Capital if they believe that they are prevented by the nature of their work from taking a timely and/or complete meal period.

**NO WORKING DURING REST BREAKS AND MEAL PERIODS**

Non-exempt employees are completely relieved of all work duties during their rest breaks and meal periods. All rest breaks and meal periods must be taken outside employees’ work areas, such as in a break room. Employees may not leave the premises during rest breaks and meal periods. Employees are not expected to remain “on call” or available to respond to messages, monitor radios, telephones, email or other devices during meal periods and rest breaks. Employees should not visit or socialize with employees who are working while taking their rest break or meal period. Employees are required to take all mandated breaks. Failure to do so may request in discipline, up to and including termination.

Employees are required to notify Human Capital immediately if they believe they are being pressured or coerced by any manager, supervisor, or other employee to forego any portion of a provided rest break or meal period.

**SUMMARY CHART**

Below is a chart that generally summarizes the number of rest breaks and meal periods provided to employees.

| Hours of Work                    | Rest Breaks | Meal Breaks |
|----------------------------------|-------------|-------------|
| 2 hours or less                  | 0           | 0           |
| 2 hours 1 min - 5 hours 59 min   | 1           | 0           |
| 6 hours                          | 1           | 1           |
| 6 hours 1 min - 10 hours         | 2           | 1           |
| 10 hours 1 min - 13 hours 59 min | 3           | 1           |
| 14 hours                         | 3           | 2           |
| 14 hours 1 min - 18 hours        | 4           | 2           |
| 18 hours 1 min - 21 hours 59 min | 5           | 2           |
| 22 hours                         | 5           | 3           |
| 22 hours 1 min - 24 hours        | 6           | 3           |



# SOUTH CAROLINA SUPPLEMENT

## PREGNANCY ACCOMMODATIONS

In compliance with South Carolina law (S.C. Code Ann. §1-13-80), the Firm will not discriminate against an individual because of pregnancy, childbirth, or related medical conditions, including, but not limited to, lactation. The Firm will endeavor to make reasonable accommodations for an employee's medical needs arising from pregnancy, childbirth, or related medical conditions, unless doing so would impose an undue hardship on the operation of the Firm's business.

Reasonable accommodations may include, but are not limited to:

- making existing facilities readily accessible to and usable by such employees, including acquiring or modifying equipment or devices necessary for performing essential job functions;
- providing more frequent or longer break periods;
- providing more frequent bathroom breaks;
- providing a private place, other than a bathroom stall for the purpose of expressing milk;
- modifying the Firm's food or drink policy;
- modifying work schedules;
- providing seating or allowing the employee to sit more frequently;
- providing assistance with manual labor and limits on lifting;
- temporarily transferring an employee to a less strenuous or hazardous vacant position, if qualified; or
- providing job restructuring or light duty, if available.

The Firm will not:

1. deny employment opportunities to an employee based on the need of the Firm to make such reasonable accommodations;
2. require an employee to accept an accommodation that the employee chooses not to accept, if the employee does not have a known limitation related to pregnancy, or if the accommodation is unnecessary for the employee to perform the essential duties of their job;
3. require an employee to take leave under any leave law or Company policy if another reasonable accommodation can be provided to the employee; or
4. take any adverse action against an employee in the terms, conditions, or privileges of employment for requesting or using a reasonable accommodation.

If employees have any questions concerning this policy, they should contact Human Capital.

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

## LACTATION BREAKS

In accordance with applicable laws, the Firm will provide nursing employees a reasonable amount of paid break time to express breast milk for a child as required by law. The Firm's policy is to allow employees to take reasonable paid time for lactation breaks. If possible, the break time must run concurrently with rest and meal periods already provided to the employee. Employees are asked to give notice of their intent to use the benefit provided pursuant to this policy. Warburg Pincus will make a reasonable effort to provide the employee with use of a room or other location, other than a bathroom, in close proximity to the employee's work area, for the employee to express milk in private. No employee who chooses to express milk in the workplace will be discriminated or retaliated against in any way for exercising their rights under this policy.

# VIRGINIA SUPPLEMENT

## VIRGINIA PREGNANT WORKERS FAIRNESS ACT

In compliance with Virginia law, the Firm will endeavor to not fail or refuse to hire, discharge, or otherwise discriminate against any individual with respect to such individual's compensation, terms, conditions, or privileges of employment on the basis of pregnancy, childbirth, or related medical conditions. Further, the Firm will not refuse to make reasonable accommodation to the known limitations of a person related to pregnancy, childbirth, or related medical conditions, unless the Firm can demonstrate that the accommodation would impose an undue hardship on the Firm.

The Firm will not take adverse action against an employee who requests or uses a reasonable accommodation pursuant to this policy, including failure to reinstate any such employee to the employee's previous position or an equivalent position with equivalent pay, seniority, and other benefits when the employee's need for a reasonable accommodation ceases. Nor will the Firm deny employment or promotion opportunities to an otherwise qualified applicant or employee because the Firm will be required to make reasonable accommodation to the known limitations of such applicant or employee related to pregnancy, childbirth, or related medical conditions. The Firm will also not require an employee to take leave if another reasonable accommodation can be provided to the known limitations related to the pregnancy, childbirth, or related medical conditions of such employee.

The Firm will endeavor to engage in a timely, good faith interactive process with an employee who has requested an accommodation pursuant to this section to determine if the requested accommodation is reasonable and, if such accommodation is determined not to be reasonable, discuss alternative accommodations that may be provided.

Reasonable accommodations may include, but are not limited to: more frequent or longer bathroom breaks, breaks to express breast milk, access to a private location other than a bathroom for the expression of breast milk, acquisition or modification of equipment or access to or modification of employee seating, a temporary transfer to a less strenuous or hazardous position, assistance with manual labor, job restructuring, a modified work schedule, light duty assignments, and leave to recover from childbirth.

If employees have any questions about or would like to request a reasonable accommodation pursuant to this policy, they should contact Human Capital.

## REASONABLE ACCOMMODATION FOR PERSONS WITH DISABILITIES

Pursuant to the Virginia Human Rights Act (the "Act"), employees have the right to reasonable accommodations for disabilities and to be free from unlawful discriminatory practices based on disability.

Under the Act, the Firm may not:

1. Refuse to make reasonable accommodation to the known physical and mental

This information supplements the national policies contained in the employee handbook for employees who work in the relevant state.

impairments of an otherwise qualified person with a disability, if necessary to assist such person in performing a particular job, unless the employer can demonstrate that the accommodation would impose an undue hardship on the Firm.

2. Take adverse action against an employee who requests or uses a reasonable accommodation pursuant to this section.
3. Deny employment or promotion opportunities to an otherwise qualified applicant or employee because such employer will be required to make reasonable accommodation for a person with a disability.
4. Require an employee to take leave if another reasonable accommodation can be provided to the known limitations related to the disability.
5. Fail to engage in a timely, good faith interactive process with an employee who has requested an accommodation pursuant to this section to determine if the requested accommodation is reasonable and, if such accommodation is determined not to be reasonable, discuss alternative accommodations that may be provided.

In determining whether an accommodation would constitute an undue hardship upon the Firm, the following will be considered:

- Hardship on the conduct of the Firm's business, considering the nature of the Firm's operation, including composition and structure of the Firm's workforce;
- Size of the facility where employment occurs;
- The nature and cost of the accommodations needed, taking into account alternative sources of funding or technical assistance available by way of the vocational services offered Department for Aging and Rehabilitative Services;
- The possibility that the same accommodations may be used by other prospective employees; and
- Safety and health considerations of the person with a disability, other employees, and the public.

If employees have any questions about or would like to request a reasonable accommodation pursuant to this policy, they should contact Human Capital.

# ACKNOWLEDGEMENT RECEIPT

## WARBURG PINCUS LLC FIRM GUIDELINES

I acknowledge that I have received a copy of the Warburg Pincus LLC Firm Guidelines and understand that it is my responsibility to read, know and comply with the procedures and policies contained therein. I understand that the most recent version of the Guidelines supersedes all previous versions and will be posted on the Firm's intranet. I understand and acknowledge that any and all policies and procedures of the Firm (whether or not set forth in these Guidelines) may be changed, modified, eliminated, supplemented or deviated from by the Firm at any time, with or without notice, in an individual case or generally, in its sole discretion.

I understand that these Guidelines are neither a contract of employment nor a legal document and nothing in the guidelines creates an express or implied contract of employment or a guarantee or promise of any kind. Nor are the guidelines intended or written to be all-inclusive.

I understand that, unless otherwise provided by applicable law, my employment is for no definite period of time and is terminable at will, either by myself or the Firm, for any reason or for no reason, with or without notice, at any time. I understand that no supervisor, manager or other representative of Warburg Pincus, other than as expressly authorized by the Firm, has the authority to enter into any agreement with me, individually or on a collective basis, for employment for any specified period of time or to make any promises that are contrary to the Firm's employment-at-will policy or other policies or procedures contained in these guidelines. To the extent that an expressly authorized representative of the Firm enters into such an agreement, I understand that such agreement shall not be enforceable unless it is in a written document signed by the authorized representative of the Firm and approved by Human Capital.

I am aware that during the course of my employment, confidential and proprietary information will be made available to me. I understand that I will be expected to abide by all policies of this Firm concerning such information.

**I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Firm Guidelines.**

\_\_\_\_\_  
**EMPLOYEE SIGNATURE**

\_\_\_\_\_  
**PRINTED NAME**

\_\_\_\_\_  
**DATE**

*The signed original copy of this receipt should be given to Human Capital. It will be filed in your personnel file.*

# ACKNOWLEDGMENT RECEIPT

## WARBURG PINCUS POLICY AGAINST DISCRIMINATION AND HARASSMENT

Warburg Pincus is committed to a work environment in which all individuals are treated with respect and dignity, free of discrimination and harassment, including sexual harassment, on any basis protected by applicable federal, state, or local law. It has been and remains the policy of the Firm to prohibit discrimination and harassment, including sexual harassment, of one employee by another employee, partner, supervisor, business associate, customer, client or guest of the Firm.

The purpose of this policy is to ensure that in the workplace no one individual may discriminate against or harass another individual on the basis of actual or perceived race, color, creed, religion, national origin, alienage, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions and lactation), disability, marital status, sexual orientation, military service and veteran status, gender identity or expression (including transgender status), genetic information, or any other protected characteristic as defined by applicable federal, state, or local law (hereinafter, the Protected Classes).

### PERSONS COVERED

This policy applies to everyone in the Firm. No partner, officer, employee or agent of the Firm is authorized to engage in acts of discrimination or harassment against anyone based on any of the Protected Classes in violation of this policy. This policy prohibits harassment by men toward women, women toward men, men toward men and women toward women. Everyone has a responsibility to maintain a workplace that is free from any discrimination or form of harassment prohibited by this policy.

### HARASSMENT

Unwelcome verbal or physical conduct, directed at an individual based upon any of the Protected Classes is strictly prohibited. Harassment may include the use of unwelcome epithets or nicknames; the display of unwelcome or offensive cartoons, pictures, slogans or symbols; "kidding," "joking" and "teasing" about sex, age, race, color, creed, ancestry, national origin, religion, sexual orientation, gender identity, marital status, veteran status, citizenship status, alienage, physical or mental handicap or disability, or any other characteristic protected by applicable law; and intimidation through physical violence or threats of violence.

## SEXUAL HARASSMENT

Sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favors and other verbal, visual or physical conduct of a sexual nature when (1) submitting to that conduct is made either explicitly or implicitly a term or condition of employment; (2) submitting or rejecting such conduct is used as a basis for any decision affecting an individual's employment; or (3) that conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. By way of example, no person shall threaten or insinuate, either explicitly or implicitly, that another person's refusal to submit to sexual advances will adversely affect that person's employment, work status, evaluation, wages, advancement, assigned duties, shifts, or any other term, condition or privilege of employment or career development. Similarly, no individual shall promise, imply or grant any preferential treatment or employment opportunities in return for sexual favors. Other examples of sexual harassment may include unwelcome sexual flirtations, advances or propositions, verbal abuse of a sexual nature, subtle pressure or requests for sexual activities, inappropriate touching or intimacy, graphic or verbal commentaries about an individual's body, sexually degrading words used to describe an individual, a display in the workplace or to any employee or applicant of sexually suggestive objects or pictures, negative stereotyping based upon gender, sexually explicit or offensive jokes, sexual remarks, epithets, slurs or physical assault.

## COMPLAINT RESOLUTION PROCEDURES

### 1. Initiation of Complaint

Any employee who believes that the employee is a victim of discrimination or any form of harassment, whether by a supervisor, a coworker or any other person with whom the individual comes in contact with or who witnesses conduct the employee believes may violate this policy or the EEO policy, should report the complaint or conduct promptly to the employee's manager or to one of the following members of the Human Capital team: Sandra Wishnick, Director, Human Capital at (212) 878-9232 or Lisa Ferraro, Director, Human Capital, at (212) 878-9257.

An employee who is either unsure of the appropriate person to whom to raise an issue of perceived harassment or who has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment should contact the Chief Human Capital Officer, Adrienne Filipov, at (212) 878-9242.

A complaint against a supervisor or someone in a more senior position in the Firm should not be reported directly to that individual but should instead be reported directly to one of the other individuals listed immediately above or to any member of the Executive Management Group. Complaints may be made verbally or in writing, but should be made in a timely manner following the incident so that a prompt investigation can occur. Once a complaint is received, the Firm will be responsible for, as it considers appropriate, investigating the complaint, reporting the results of the investigation and, where an action is determined to be appropriate, to inform the

parties of the steps that will be taken to correct the situation.

Any manager or supervisor who receives a complaint of sexual or other harassment from an employee or who otherwise knows or has reason to believe that an employee is or has been subjected to any such harassment is expected to report the incident promptly to one of the individuals listed above for investigation.

### 2. Investigation

Once a complaint is received, the Firm will be responsible for investigating the complaint as it considers appropriate. An investigation may include interviews with the complainant, the alleged offender, and any other persons the Firm deems appropriate. Relevant documents may also be reviewed. Employees are required to cooperate in all investigations. The Firm will endeavor to maintain confidentiality to the extent practicable, but confidentiality cannot be guaranteed. After its investigation, if the Firm believes its non-discrimination/harassment policies have been violated, it will exercise its discretion to impose disciplinary action on the offending employee, up to and including termination of employment. Reporting the results of the investigation and, an individual who remains unsatisfied after an investigation, may direct a written request for review to any member of the Executive Management Group, which may, if it deems appropriate in its reasonable discretion, direct or conduct an independent investigation concerning the complaint.

### 3. Disciplinary Action

Corrective action will be taken whenever violations of the EEO Policy or this policy are determined to have occurred. The disciplinary action that may be imposed against the offending party for violation of this policy or the EEO Policy may include, by way of example only, written warning, suspension or termination of employment of the offending party. Anyone interfering with or providing information that the individual knows to be inaccurate during an investigation pursuant to this policy or the EEO policy may be subject to disciplinary action, up to and including termination of employment.

#### *Third-Party Harassment*

Any person who believes that they have been discriminated against or harassed on a basis prohibited by this policy by a third party (i.e., a non-employee of the Firm) doing business with the Firm should report the incident promptly in accordance with the above procedures. The complaint will be investigated in a manner similar to that set forth above.

#### *Non-Retaliation*

Retaliation against employees or applicants who report incidents of discrimination or any form of harassment prohibited by this policy, or who participate in an investigation of discrimination or any form of harassment prohibited by the policy, is strictly prohibited. In addition, employees and applicants are protected from coercion, intimidation, interference or discrimination as a result of reporting violations or assisting in investigations in good faith. Individuals who believe



they have been retaliated against because of a complaint made by them or due to their participation in an investigation should immediately report the matter in accordance with the procedures set forth in this policy. Any individual who retaliates against an employee or applicant who complains about discrimination or harassment or who participates in the investigation of a complaint will be subject to disciplinary action, up to and including termination of employment.

I have read and understood the Firm's Policy Against Discrimination and Harassment.  
*For California Employees: I also acknowledge I have received the California Civil Rights Department's Sexual Harassment Fact Sheet (CRD-185).*

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**EMPLOYEE SIGNATURE**

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**PRINTED NAME**

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**DATE**

