



# EMPLOYEE HANDBOOK

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## 1. Welcome

Welcome to Antra, Inc. We are delighted that you have chosen to join our organization and hope that you will enjoy a long and successful career with us. As you become familiar with our culture and mission, we hope you will take advantage of opportunities to enhance your career and further Antra's goals.

Antra, Inc. was established in 2008 and began as an Information Technology Services firm serving businesses across the country. Since then, Antra, Inc. has been working diligently to serve client's needs for software solutions and services. Each year we work hard to improve our knowledge, performance, and customer service. We stretch ourselves to meet our customer expectations and provide them the best services. Customer gratitude is ultimately what makes our company grow.

As technology is evolving and the business world is changing we quickly adapt ourselves by broadening our technology base, introducing new and improved processes, and keeping up with the competition

You are joining an organization that has a reputation for outstanding leadership, innovation, and expertise. Our employees use their creativity and talent to invent new solutions, meet new demands, and offer the most effective services/products in the industry. With your active involvement, creativity, and support, Antra will continue to achieve its goals. We sincerely hope you will take pride in being an important part of Antra's success.

Please take the time to review the policies contained in this handbook. If you have questions, feel free to ask your supervisor or to contact the Human Resources Department.



## 2. Introduction to this Handbook

The Employee Handbook is your guide to the policies, processes, benefit plans, and other valuable information at Antra, Inc. This employee handbook is not a contract, expressed or implied for employment for any period. It merely sets forth policies and procedures in effect on the date of the issue.

This handbook does not establish a contract or employment, nor does it establish contractual obligations on the part of Antra, Inc. An employee does not have a guarantee of employment, rather the Employment Agreement executed by Antra, and each employee establishes the terms of the employee's employment with Antra.

Antra, Inc. has the unilateral right to revise and update the policies at will. Human Resources staff is available to answer questions not covered in the Employee Handbook and to help you with any concerns you may have regarding company policies, processes, benefits programs, and other items that you may become interested in learning more about on a case-by-case basis. This Employee Handbook supersedes all prior policies or procedures as to the subjects addressed in the Employee Handbook and all representations, oral or written. The policies and procedures contained in this Employee Handbook may be modified, amended, or canceled by Antra, Inc. at any time, with or without notice. Such changes will be provided at the time of institution and the Employee Handbook will be periodically updated in its entirety.



## 3. Human Resource Policies

### 3.1 Employment at Will

Employment at **Antra, Inc** is on an at-will basis unless otherwise stated in a written individual employment agreement signed by the President of the company.

This means that either the employee or the company may terminate the employment relationship at any time, for any reason, with or without notice. Nothing in this employee handbook is intended to or creates an employment agreement, express or implied. Nothing contained in this or any other document provided to the employee is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any period. Besides, no company representative is authorized to modify this policy for any employee or to enter into any agreement, oral or written, that changes the at-will relationship.

### 3.2 Communication and Conflict Resolution

At Antra, Inc. we believe in open, honest, and direct communication across all levels of the organization. We provide formal and informal avenues for the exchange of ideas through e-mail, planned meetings, and frequent give-and-take of information.

Antra, Inc.'s open communication policy provides procedures for addressing constructive suggestions, questions, problems that may arise regarding an employee's work environment or personal problems that may affect work.

One of Antra, Inc.'s primary goals is to continuously strive to improve employee satisfaction. An important factor in employee satisfaction is how we respond to

employee questions and concerns. Antra, Inc. believes that one of the reasons we maintain high employee satisfaction and low employee turnover is that we respond to employee questions and concerns in a fair, equitable, and timely manner.

### **3.3 Equal Opportunity Employer**

It is a fundamental policy of Antra, Inc. not to discriminate based on race, color, religion, sex, national origin, age, handicap or disability, concerning recruitment, compensation, benefits, transfers, layoffs, terminations, hiring, training, promotion and other terms and conditions of employment.

It is the policy of the company to base employment decisions solely upon an individual's qualifications relating to the requirements of the position for which the individual is being considered; recruit, hire, and promote the best-qualified persons for all jobs without regard to race, color, religion, sex, sexual orientation, marital status, national origin, age, handicap or disability. When opportunities are available, Antra, Inc. will consider promoting from within the Company and also consider newly hiring candidates and will select those persons who demonstrate the greatest potential for individual growth with the Company and for contributing to current and future client assignments.

Antra will ensure that all personnel actions such as compensation, benefits, transfers, layoffs, company-sponsored training, promotions, terminations, and disciplinary actions are applied equally.

This Equal Employment Opportunity Policy is consistent with the requirements and objectives established by the Civil Rights Act of 1964, the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, the Americans with Disabilities Act Amendment Act of 2008, the Vietnam Era Veterans' Readjustment Act of 1974, the Presidential Executive Order 11246, and all other Civil Rights laws, all as amended. If any employee believes prohibited discrimination has occurred, or if any Employee has questions concerning this policy, he or she should promptly notify Human Resources or his or her supervisor. Reports will be investigated expeditiously, and appropriate corrective action will be taken. There will be no retaliation or other adverse action taken against any person for the exercise of his or her right to report good faith concerns of discrimination or violation of the EEO policy. Complaints will be handled confidentially, except as necessary for proper investigation and resolution, and no employee will be retaliated against for participating in a Company investigation. This policy of equal employment opportunity will be communicated to and will govern all employees who are in any way responsible for employment activities, as well as external recruitment sources used by the Company.

### **3.4 Employee Eligibility Verification**

Antra, Inc. is an E-Verify compliant company. Employment is contingent upon Antra, Inc.'s receipt of proper documents required by the employer, Federal, State, and local authorities that establish identity and employment eligibility, including the I-9 form. Once Antra, Inc. extends an employment offer, all employees are required to complete a Form I-9 (Employment Eligibility



Verification) before work begins, but no later than 72 hours after starting employment. The U.S. Immigration laws require this documentation. Antra, Inc. will not use this information in any discriminatory way. All I-9 Forms, E-Verify paperwork, and immigration-related documents will be kept confidential and secure in a separate file system apart from an employee's personnel folder.

### **3.5 Americans with Disabilities Act (ADA) and Americans with Disabilities Act Amendments Act (ADAAA) Policy**

As a part of the Company's desire to maintain a diverse workforce, Antra, Inc. complies with the Americans with Disabilities Act, the Americans with Disabilities Act Amendments Act, and all other Federal, State and local laws as amended that provide for nondiscrimination in employment against qualified individuals with disabilities. ADA and ADAAA pertain to Federal civil rights laws covering the following: (A) individuals who have a physical and/or mental disability which substantially limits one or more major life activities of such individual; (B) persons who have a record of such an impairment, or; (C) persons being regarded as having such impairment.

Employees or applicants with a qualified disability (including life-threatening illnesses) may make requests for reasonable accommodations to their Supervisor or the HR. Antra, Inc. may be able to provide reasonable accommodation, whenever possible, to facilitate the employee's abilities and productivity. Accommodations will be determined on a case-by-case basis and in conjunction with recommendations from the employee and medical professionals. Reasonable accommodations may not be made under circumstances where such accommodations will cause undue hardship for the Company.

Individuals with physical and mental disabilities, as well as life-threatening illnesses, should be treated in a non-discriminatory manner at all times. Employees should always respect the rights and feelings of each other as well as vendors, visitors, and clients. Disabilities and life-threatening illnesses will be treated confidentially, to the extent possible.

Antra, Inc. supports work endeavors by persons who are protected by ADA and ADAAA, as long as employees can meet acceptable performance standards of the essential functions of their jobs, and do not pose a reasonable health/safety hazard to themselves or others.

Medical information concerning individual employees is treated confidentially. Antra, Inc. will take reasonable precautions to protect such information from inappropriate disclosure. Supervisors and other employees have a responsibility to respect and maintain the confidentiality of an employee's medical information. Anyone inappropriately disclosing such information is subject to disciplinary action, up to and including termination of employment.

### **3.6 Prohibition against Harassment Policy**

It is the policy of the Company to prohibit harassment in employment based on sex, race, color, religion, age, national origin, disability, veteran status, sexual orientation, marital status or any other factor prohibited by law. Violations of

the policy will result in disciplinary action up to and including termination. Antra, Inc. prohibits the harassment of or by a representative of a customer, client, vendor subcontractor, or other business affiliates that have a relationship to the employee through the business of the Company. Improper interference with the ability of employees to perform their expected job duties will not be tolerated and should be reported to the appropriate supervisory personnel immediately.

Under federal law and regulations, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute unlawful sexual harassment when either: (1) submission to such conduct is or becomes a term or condition of an individual's employment or is used as a basis for employment decisions relating in any way to that individual; (2) such conduct substantially interferes with an individual's work performance; or (3) such conduct creates an intimidating, hostile, or offensive working environment.

Other forms of unlawful harassment are also prohibited by this policy. Such harassment may include harassment based upon a person's race, national origin, religion, age, or disability. Such forms of harassment may be reported according to this policy.

Any employee found to have engaged in such conduct, or who condones such action on the part of subordinates, will be subject to appropriate disciplinary action up to and including termination of employment. An employee may also be subject to individual liability and penalties as a harasser.

### **3.6. Sexual Harassment**

Sexual harassment is strictly prohibited. While all forms of harassment are prohibited, special attention should be paid to sexual harassment. "Sexual harassment" is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual's employment or as a basis for employment decisions; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute sexual harassment.

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

- Unwanted sexual advances, whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip

- regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess
- Displaying sexually suggestive objects, pictures, or cartoons
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments
- Inquiries into one's sexual experiences
- Discussion of one's sexual activities

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

Sexual harassment applies to any relationship between employee and employer or contractor. It also applies between other employees, peers, and subordinates. If for any reason you believe you are a victim of sexual harassment it is important that you report to your manager or if preferred, Senior Management. A report of the facts will be made in complete confidence. If it has been established that an offense has been committed, it may result in immediate dismissal to the offender.

### 3.6.2 Complaint Procedure for Harassment

Any employee who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to make a complaint. You may complain directly to your immediate supervisor or department manager, the HR director, or any other member of management with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above.

The Company expressly prohibits any form of retaliatory action or adverse action against an employee for the exercise of their right to report in good faith any occurrences of harassment. Retaliation is a violation of this policy and may result in disciplinary action, up to and including termination.

### 3.7 Open Door Policy

Antra, Inc strives to maintain a positive and pleasant environment for all our employees. To help us meet this goal our company has an open-door policy by which employees are encouraged to discuss any work-related concerns with their manager. If you have a question or a complaint or are concerned by a job-related situation, you should first speak with your immediate supervisor or manager. This is usually the best way to seek resolution of problems and is a matter of professional courtesy. If, however, the issue is not resolved, you are encouraged to bring your concern to the next level of management.

Should your concern not be satisfactorily addressed by your manager or is one that you would rather not discuss with your immediate Antra manager within your department, then you should contact the Human Resource Manager who will assist you with finding a resolution for your concern. HR Manager will advise and counsel you on a wide range of issues, as well as clarify and answer

questions regarding Human Resources policies, and are responsible for investigating all grievances brought to the Company's attention.

### **3.8 Information Systems Policies and Procedures**

#### **3.8.1 E-Mail Usage Policy**

The purpose of this policy is to ensure the proper use of Antra, Inc.'s e-mail system and make users aware of what Antra, Inc. deems as acceptable and unacceptable use of its e-mail system. Antra, Inc. reserves the right to amend this policy at its discretion. In the case of amendments, users will be informed appropriately.

The email usage policy promotes effective and responsible use of e-mail within Antra. The e-mail system and the contents of all e-mail messages sent, received, or stored in the email system are property of Antra, Inc. Antra, Inc. management has the right to access, monitor, review, copy delete, and disclose any employee e-mail messages on the e-mail system with or without prior notice.

The e-mail system Antra, Inc. provides is to assist Antra, Inc. employees with business communications and, as such, should be used for communication-related to Antra, Inc. business. The system must not be used for non-company related purposes including soliciting outside business ventures, or advertising for personal enterprises. To help assess the appropriateness of your e-mail use, consider whether your supervisor and his/her manager would share your judgment that your e-mail use is related to Antra, Inc.'s business. No Records/Electronic are to be removed from Antra, Inc.'s workplace without express authorization from Antra, Inc. management. Upon employment termination, all Records are to be returned to Antra, Inc.

##### **3.8.1.1 Legal Requirements**

The following rules are required by law and are to be strictly adhered to:

1. It is strictly prohibited to send or forward e-mails containing libelous, defamatory, offensive, racist or obscene remarks. If you receive an e-mail of this nature, you must promptly notify your supervisor.
2. Do not send unsolicited e-mail messages.
3. Do not forge or attempt to forge e-mail messages.
4. Do not send e-mail messages using another person's e-mail account.
5. Do not copy a message or attachment belonging to another user without permission of the originator.
6. Do not disguise or attempt to disguise your identity when sending mail.



### 3.8.1.2 Legal Risks

E-mail is a business communication tool and users are obliged to use this tool in a responsible, effective, and lawful manner. Although by its nature e-mail seems to be less formal than other written communication, the same laws apply. Therefore, users must be aware of the legal risks of the e-mail:

1. If you send or forward e-mails with any libelous, defamatory, offensive, racist or obscene remarks, you and Antra, Inc. can be held liable.
2. If you unlawfully forward confidential information, you and Antra, Inc. can be held liable.
3. If you unlawfully forward or copy messages without permission, you and Antra, Inc. can be held liable for copyright infringement.
4. If you send an attachment that contains a virus, you and Antra, Inc. can be held liable.

### 3.8.1.3 Writing and Sending E-mails

1. Write well-structured e-mails and use short, descriptive subjects.
2. Antra, Inc.'s e-mail style is business informal. This means that sentences can be short and to the point. The use of Internet abbreviations and characters such as emoji, however, is not encouraged.
3. Signatures must include your name and contact information.
4. Use the spell checker before you send out an e-mail.
5. Do not send unnecessary attachments. Compress attachments larger than 200K before sending them.
6. Try to avoid writing e-mails in all capitals – this is perceived as shouting.
7. Do not use bcc: fields unless the bcc: the recipient is aware that you will be blind-copying an email to him/her and knows what action, if any, to take.
8. If you forward e-mails, State clearly what action you expect the recipient to take.
9. Only send e-mails to which the content could be displayed on a public notice board. If they cannot be displayed publicly in their current state, consider rephrasing the e-mail, using other means of communication, or protecting information by using a password (see confidential).
10. Only mark e-mails as important if they are important.
11. If you receive an e-mail in error, do not "Reply to all," but rather only reply to the sender and inform him or her of the error.
12. E-mails should be replied to within at least 12 working hours, but users must endeavor to answer priority e-mails within 6 hours. Priority e-mails are e-mails from existing customers and business partners.

### 3.8.1.4 Personal Use of E-mails

Although Antra, Inc.'s e-mail system is meant for business use, Antra, Inc. allows the reasonable use of e-mail for personal use if certain guidelines are adhered to:

1. Personal use of e-mail should not interfere with work.
2. Personal e-mails must also adhere to the guidelines in this policy.
3. Personal e-mails are kept in a separate folder, named 'Private'. The e-mails in this folder must be deleted weekly so as not to clog up the system.
4. The forwarding of chain letters, junk mail, and jokes are strictly forbidden.
5. Do not send mass mailings.
6. All messages distributed via the company's e-mail system, or over the

company's network system, even personal e-mails, may be monitored and recorded per Antra, Inc.'s document retention and information security policies.

#### **3.8.1.5 Transmitting Confidential Information via E-mail**

Avoid sending confidential or proprietary information by e-mail. Some examples of such information include, but are not limited to social security numbers, protected health information (PHI), personally identifiable information (PII), HIPAA information, company trade secrets and financials, and billing rates. If you must transmit confidential information via e-mail, you are required to secure the information by including it in an attached file, such as Microsoft Word or Excel file, with password protection; then provide the recipient with the password using other communication, for instance by telephone, or a separate e-mail message. Additionally, you must also do the following to label the message: (1) include at the beginning of the Subject line the word "CONFIDENTIAL:" and; (2) include in your signature line the below confidentiality & disclaimer statement.

#### **3.8.1.6 System Monitoring**

You must have no expectation of privacy in anything you create, store, send, or receive on the company's computer system. Your e-mails can be monitored without prior notification if Antra, Inc. deems this necessary, subject to applicable laws. If there is evidence that you are not adhering to the guidelines set out in this policy, Antra, Inc. reserves the right to take disciplinary action, including termination and/or legal action. Antra, Inc. also reserves the right to monitor information that passes over the company's network that uses company resources or bandwidth, and this may include personal e-mail accounts, such as Yahoo, Gmail, and other similar exchanges, subject to applicable laws. Nothing herein will limit employee's rights under Section 7 of the NLRA.

#### **3.8.2 Social Media Usage Policy**

The social media usage policy refers to all Social media or social networking or Messaging applications includes all forms of online publishing and discussions, including but not limited to: blogs, wikis, file-sharing, user-generated video and audio, social networks and other social networking applications and websites such as Facebook, Twitter, YouTube, Pinterest, and LinkedIn, and messaging applications such as Whatsapp, WeChat and all-new social media environments that may appear in the future.

The employee will not do the following:

- Post material that infringes on the rights of the Antra, Inc. and its Clients, including privacy, intellectual property, or publication rights. This includes the improper use of (but is not limited to) images, logos, videos, content, documents, white papers, etc.
- Use the working hours to excessively use social media platforms and applications that can affect/ hinder the work of the employee.

The employee shall adhere to all the additional social media policies of the client location that the employee is working on.

#### **3.8.3 Soft lifting/Software Piracy**

Antra, Inc. prohibits employees from making and using illegal software reproductions since both practices violate the U.S. Copyright laws and could

place the employee and/or Antra, Inc. in serious legal consequences.

### **3.9 Drug-Free Workplace Policy (per the Drug-Free Workplace Act of 1988)**

Antra, Inc. is committed to providing a safe work environment and to fostering the well-being and health of its employees. That commitment is jeopardized when any Antra, Inc. employee illegally uses drugs or alcohol on the job, comes to work with these substances present in his/her body, or possesses, distributes, or sells drugs in the workplace. Therefore, Antra, Inc. has established the following policy:

1. It is a violation of Antra, Inc.'s policy for any employee to possess, sell, trade, or offer for sale illegal drugs or otherwise engage in the illegal use of drugs or alcohol on the job.
2. It is a violation of Antra, Inc.'s policy for anyone to report to work under the influence of illegal drugs or alcohol – that is, with illegal drugs or alcohol in his or her body.
3. It is a violation of Antra, Inc.'s policy for anyone to use prescription drugs illegally.
4. Violations of this policy are subject to disciplinary action up to and including termination.

The Drug-Free Workplace Act specifically requires Antra, Inc. to notify each employee that, as a condition of employment, each employee must:

1. Comply with Antra, Inc.'s Drug-Free Workplace Policy
2. Notify Antra, Inc. of any conviction for a drug-related offense within five (5) days of the conviction. Antra, Inc. will take appropriate action within 30 days of the notification, including notifying Federal contracting agencies when appropriate.

It is the responsibility of Antra, Inc.'s supervisors to counsel employees whenever they see changes in performance or behavior that suggests an employee is under the influence of alcohol or other drugs. Although it is not the supervisor's job to diagnose personal problems, the supervisor should encourage such employees to seek help and advise them about available resources for getting help.

The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive, and drug-free environment. This policy intends to offer a helping hand to those who need it while sending a clear message that illegal drug use and alcohol abuse are incompatible with employment at Antra, Inc.

### **3.9 Progressive Discipline Policy**

Antra, Inc. reserves the discretion to start the disciplinary steps at any point in the following process. Nothing in the Progressive Discipline Policy is to be construed as abrogating the employee's status as an employee-at-will. In other words, Antra, Inc. reserves the right to bypass any steps necessary to appropriately deal with the situation at hand; this may include immediate termination or dismissal, depending on the particulars of the situation.

Normally, the employee's immediate Supervisor will administer any appropriate corrective or disciplinary action. Appropriate action will be determined based on factors such as severity, frequency, and degree of deviation from

expectations, and length of time involved.

Disciplinary actions may take place in several forms, such as Verbal Counseling actions, Written Counseling actions, Suspensions, and Dismissals.

### 3.9.1 Verbal Counseling

Verbal Counseling sessions may take place between employees and supervisors in situations where feedback needs to be made very clearly and firmly. Every effort to determine and resolve the causes of the problem should be made. At the same time, however, it should be specifically stated that the employee is receiving a formal warning. Documentation of verbal counseling should be made by the Supervisor and maintained by the HR Department.

### 3.9.2 Written Counseling

Written counseling sessions take place between a Supervisor and an employee when the behavior, actions, or performance of the employee results in repeated violations of company policy or workplace expectations. Written counseling may occur whether or not verbal counseling has already been administered (depending on the severity of the situation). Written warnings should be documented on a Corrective Action Notice, Performance Improvement Plan, Coaching Development Plan, or another type of written memorandum to communicate the Company's concerns to the employee and outline the effects that the concerns may have on the workplace, or on the employee's continued employment if left uncorrected.

## 3.10 Grievance Policy

### 3.10.1 Filing a Grievance

To file a grievance, the employee submits a written statement summarizing the issue to the HR Department. Because it is difficult to resolve outdated issues, grievances must be submitted to HR promptly, normally within one week of the failure to resolve the issue through informal channels. The following information should be included:

1. **Grievance Statement:** A description of the work-related issue, including the policy or rule that the employee alleges, was violated, if applicable, and the name of the respondent.
2. **Background:** A statement of the relevant facts supporting the employee's position, including information about the impact the issue has had or is having on the employee.
3. **Requested Resolution:** A statement of what the employee is requesting as a satisfactory resolution to the grievance.

If an employee who has already filed a grievance wishes to pursue new issues that are unrelated, a new grievance should be filed. Employees can supplement an initial grievance statement with additional information to clarify the issues further. The employee can stop the grievance process at any time by giving written notice to the HR Department.

## 3.11 Travel Reimbursement Policy

Antra, Inc. will reimburse travel expenses incurred for official purposes, subject to advance approval, and documented with proper receipts. The travel reimbursement expenses are limited to transportation (air/train/bus or personal



vehicle), car mileage and/or car rentals, hotel lodging, meals, tolls, and parking, telephone calls, faxes, meeting registration fees, and other miscellaneous expenses. The employee is required to submit an expense report to claim reimbursement for such expenses. Travelers should incur expenses prudently to assist in controlling the cost of travel. **Please coordinate with the Accounting Department to facilitate the most cost-effective travel arrangements.**

#### 3.11.1 Corporate Travel Approval

Employees must obtain **advance approval** from the Supervisor plus one level above before incurring any expenses or otherwise commencing the official travel or submitting a claim for reimbursement.

#### 3.11.2 Client/Billable Travel Approval

The employee must obtain **advance approval** from Supervisor/Lead, Project Manager, and Client (if necessary) before incurring any expenses or otherwise commencing the official travel or submitting a claim for reimbursement.

#### 3.11.3 Reimbursable Expenses

The following items are reimbursable within the limits explained in the supporting sections:

1. Mileage for use of the personal vehicle
2. Cost of car rental
3. Transportation (air/train/bus/car)
4. Lodging
5. Meals

#### 3.11.4 Transportation (air/train/bus/car)

When the most efficient travel is by air, reimbursement will be limited to coach fare except when the seats are not available in coach class and dates cannot be changed. The Employee is required to obtain prior approval from the Senior Management and contact the Accounting Department for making necessary travel arrangements.

#### 3.11.5 Making Reservations in Advance

The most deeply discounted fares are available when purchased three to thirty days before departure. Most of these fares are non-refundable but the fare paid can be applied to a future non-refundable ticket for travel on the same airline upon payment of a fee (usually \$25 - \$50).

Be flexible in the selection of airlines and times of travel. One airline may have a promotional fare not offered by competing carriers.

#### 3.11.6 Cost-Saving Considerations

Whenever practical the most economical means of transportation to and from hotels and terminals should be used. Many hotels provide complimentary shuttle service to and from airports.

#### 3.11.7 Meals

Reimbursement shall be allowed for reasonable actual meal expenses incurred,

including tips. Meals included in the cost of registration fees or when served by airlines at no additional charge to the traveler shall not be submitted as reimbursable items. Names of guests, if any, and their professional affiliation must be included on the expense report if the expense report covers expenses made with guests.

Note: An itemized receipt is required for reimbursement.

### **3.11.9 Non-Reimbursable Expenses**

Reimbursement shall not be made for expenses incurred for the sole benefit of the employee such as valet service, entertainment, movie rentals, etc. Other expenditures, not reimbursable include:

1. Traffic fines for parking or speeding violations
2. Lost or stolen cash or other personal property
3. Repairs to personal vehicles used for Company travel
4. Cancellation fees for unreasonable failure to cancel hotel or transportation reservations
5. Personal-vehicle mileage reimbursement that is more than the cost of commercial transportation (plane, train) to and from the stated destination
6. Spouse or other family member expenses
7. Commuting costs between home and the Employee's primary work location
8. Laundry service except for long international trips or extended periods of domestic travel
9. Hotel costs that exceed the Federal Government-approved rates

### **3.11.10 Travel With Companion**

Antra, Inc. will not reimburse personal, spouse, or companion travel and other related travel expenses. The employee is responsible for allocating only his/her portion of expenses on the Expense Report and for identifying them in the hotel, restaurant, transportation, and other receipts. The Company will pay only up to the single room rate at hotels.

### **3.12 Personnel, Confidential and Immigration Records**

Official personnel, confidential, and immigration records for all applicable employees are maintained by the Human Resources in separate and secure file locations to protect Personally Identifiable Information (PII) and Protected Health Information (PHI). The Company recognizes and respects the information contained in employee records. Certain information about you as a member of the organization is essential for the Human Resources department and departments that affect payroll. Your family status, home address, emergency contact, military status, disability status, and telephone number must be correct and current. Be sure to tell the Human Resources department whenever this information changes.

Confidential files are strict of a private nature and therefore access to these files is limited to the employee, and to officials and individuals with a legitimate need for access to such files to conduct Company business, or for administrative purposes of healthcare, and to help ensure the safety and security of the business and employees.

In response to valid requests to verify employment, for business references, or

credit purposes, the company will release employment status, i.e., active or terminated, job title, and dates of employment. Additional employment information will be released upon written authorization from the employee. Additional information may also be released according to a subpoena or other legal obligation.

For all H-1B and other nonimmigrant workers of Antra, Inc. it is our policy to maintain strict compliance with all governing laws and best practices, including maintaining a public-access file system. The company is prepared for inspection of public-access files for each Labor Condition Application (LCA) filed and certified by the Department of Labor (DOL) in connection with an H-1B petition. You may, in the course of your work, have access to information about the Company, other employees, or customers, which is confidential. This information is not to be revealed to anyone other than in the normal course of conducting your duties and responsibilities.

Disclosure of such information is prohibited and could result in disciplinary action, up to and including termination of employment.



## 4. Antra, Inc. Code of Conduct

### 4.1 Code of Conduct

This Code of Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees and officers of Antra, Inc. All of our employees and officers must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by Antra, Inc. agents and representatives. Besides, Antra, Inc. policies apply to various Antra, Inc. operations and you need to know and follow those policies that apply to your Antra, Inc. work.

If a law conflicts with a policy in this Code, you must comply with the law. However, if a local custom or policy conflicts with this code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. Employees and officers are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this Code or Antra, Inc. policy.

Those who violate the standards in this Code will be subject to disciplinary action, including possible dismissal. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or Antra, Inc. If you are in a situation, which you believe may violate or lead to a violation of this Code, follow the procedures set out in the clause titled “Compliance Procedures” of this Code.

### 4.2 Compliance with Laws, Rules, and Regulations

Obedying the law, both in letter and in spirit, is the foundation on which Antra, Inc.'s ethical standards are built. All employees and officers must respect and obey the laws, rules, and regulations of the cities, states, and countries in which we operate. Although employees and officers are not expected to know the details of each of these laws, rules, and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other



appropriate personnel.

In addition to complying with Company policies and job-specific requirements, you are also expected to obey the rules and regulations of Antra, Inc. job sites. If your performance does not meet position requirements, you may be subject to disciplinary action, up to and including immediate termination, with or without notice, and with or without cause at any time.

#### **4.3 Examples of Conduct Prohibited by Company Policy**

The following examples are not intended to constitute a complete and exhaustive list of prohibited conduct. Also, the Company reserves the right to change the examples listed below at any time with or without notice. While discipline for standard violations will follow a progressive disciplinary procedure, the Company reserves the right to implement discipline following the grievousness of the violation. Violations of these or any other Company policies may subject you to disciplinary action, up to and including immediate termination:

1. Theft, fraud, embezzlement, or other proven acts of dishonesty.
2. Any harassment of another employee (verbal, physical, or visual), including sexual harassment such as offensive gestures, unwelcome advances, jokes, touching, or comments of a sexual nature made to or about another employee, vendor, or customer.
3. Obtaining employment or promotion based on false or misleading information.
4. Soliciting or accepting gifts (money, services, or merchandise) in connection with Company business.
5. Reporting for work under the influence of alcohol or any illegal substances; or possession, sale, or distribution of alcohol or illegal substances while on Company premises or abusing such items while representing the Company or conducting Company business.
6. Engaging in unauthorized employment elsewhere while on paid benefits related to illness, or while on an extended absence.
7. Assisting anyone, whom you know or suspect to be involved in, or committing any crime or engaging in any conduct which rises to the level of a crime.
8. Falsifying Company documents or records, including misuse of timekeeping records, or falsely inputting payment data.
9. Insubordination, meaning refusing to follow legitimate instructions of a superior directly related to the performance of one's job.
10. Disrupting the work environment.
11. Excessive absenteeism or unacceptable patterns of absenteeism.
12. Repeatedly failing to use a time-clock as directed.
13. Job abandonment, meaning the failure to report to work without properly notifying one's immediate supervisor, or leaving a job assignment before completion of your responsibilities.
14. Conduct that is likely to cause another employee, customer or vendor of the Company embarrassment, loss of dignity, feelings of intimidation, or loss of opportunity, including all forms of discrimination and harassment.
15. Unauthorized use of Company or customer supplies, information, equipment, funds, or computer codes/passwords.

16. Knowingly mishandling a customer's or potential customer's account. This includes improper discriminatory practices.
17. Refusing to repay a documented overpayment of any compensation.
18. Possessing firearms or weapons while on Company premises or carrying them while on Company business; or threatening the personal safety of fellow employees, customers, or vendors.
19. Committing any act, on or off the Company's premises, which threatens or is potentially threatening to the reputation of the Company or any of its employees, customers, or vendors.
20. Repeatedly working overtime without the approval of a supervisor or manager.
21. Repeatedly failing to meet job responsibilities, job budget, or quality requirements.

#### 4.4 Personal Conflicts Of Interest

**Antra, Inc** expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical conduct, and following all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interest.

Exactly what constitutes a conflict of interest or unethical business practice is both a moral and a legal question. **Antra, Inc** recognizes and respects the individual employee's right to engage in activities outside of employment which is private and does not in any way conflict with or reflect poorly on the company.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If there is a potential conflict of interest, the employee should discuss this with a manager for advice and guidance on how to proceed. The list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

1. Simultaneous employment by another firm that is a competitor of or supplier Antra, Inc
2. Carrying on company business with a firm in which the employee, or a close relative of the employee, has substantial ownership or interest.
3. Holding a substantial interest in, or participating in the management of, a firm to which the company makes sales or from which it makes purchases.
4. Borrowing money from customers or firms, other than recognized loan institutions, from which our company buys services, materials, equipment, or supplies.
5. Accepting substantial gifts or excessive entertainment from an outside organization or agency.
6. Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
7. Participating in civic or professional organization activities in a manner that divulges confidential company information.
8. Misusing privileged information or revealing confidential data to outsiders.
9. Using one's position in the company or knowledge of its affairs for personal gains.

10. Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.

#### **4.5 Use of Company or Customer Property**

Employees are not allowed to use Company or customer supplies, information, equipment, or funds unless authorized to do so; the Customer's property must never leave the premises.

#### **4.6 Relationships with Customers and Other Employees**

Antra, Inc. seeks to foster and maintain a productive and healthy working environment. This can only be accomplished through the cooperation of our employees. Employees should treat each other with mutual respect. Company policy and philosophy are simply to treat others in the manner you would want to be treated. If you or any other employee is treated with disrespect, it should be reported to your supervisor or the Human Resource Manager.

Internal problems should be discussed with management, not the customer. At one time or another, we all become frustrated as a result of our internal problems. These problems may result from a period of high turnover, administrative backlog, or simply because of human error. However, when we communicate these inefficiencies to our customers, we lose our credibility.

#### **4.7 Office Environment**

The Office environment is a shared workspace and each employee's use of that space must take this fact into account. Employees should show reasonable consideration for their colleagues and their clients by not contributing to excessive or inappropriate disruptions and distractions in the office.

#### **4.8 Relationships with Our Competitors**

Antra, Inc. requires every employee to adhere to the highest standard of ethical business conduct. Our most valuable asset is our good name. To compete effectively and fairly in the marketplace with our many competitors, Antra, Inc. must remain alert to changes in services and products offered to the public by our competitors. Employees may not, however, seek to gain this information improperly.

For example, it is prohibited to hire an employee of a competitor to gain access to that competitor's trade secrets or proprietary information. Similarly, an employee or former employee is prohibited from providing such confidential information to our competitors.

Both federal and state law prohibits conspiracies or agreements that unreasonably restrain trade. Formal or informal understandings or agreements between competitors concerning the pricing of services or limitations on the output of services are unlawful and may not be discussed by an employee with any competitor.

#### **4.9 Employee Responsibilities and Conduct**

In addition to performing the job to the best of one's knowledge and ability, there are other responsibilities one assumes as an employee of Antra, Inc. Antra, Inc. expects each employee to act at all times following its corporate values of expressing a professional attitude, working with perseverance, and acting with integrity. Acting following these values requires being:

1. On-time and alert when scheduled to be at work
2. Careful and conscientious in the performance of duties
3. Courteous and helpful when dealing with people
4. Cooperative in carrying out assignments
5. Team-players when sharing work responsibilities
6. Frank and direct in providing opinions and advice
7. Honest and forthright in dealing both with the Company and with its clients

Any employee whose conduct, actions, or performance violates or conflicts with Antra, Inc.'s policies may be terminated immediately and without warning. The following are some examples, although not an exhaustive listing, of grounds for immediate dismissal of an employee:

1. Fighting or any serious breach of acceptable behavior
2. Rude language, behavior or insubordination
3. Improper use of corporate or client facilities and/or resources
4. Breach of trust or dishonesty
5. Willful violation of established policy or rule
6. Gross negligence
7. Violation of substance abuse policy
8. Theft
9. Violation of the Company's conflict of interest or confidentiality policy
10. Sexual or other forms of harassment
11. Possession of weapons and/or dangerous and/or unauthorized materials
12. Verbal or other threats made against an employee, client or Antra, Inc. as an entity
13. Absence from work without notice for three consecutive working days, unless otherwise excused by law.

Improper behavior, which adversely affects or is otherwise detrimental to the interests of Antra, Inc., other employees or clients, will result in disciplinary action up to and including termination.

#### **4.10 Employee Confidentiality**

Employees and officers must maintain the confidentiality of proprietary information entrusted to them by Antra, Inc. or its customers or suppliers, except when disclosure is authorized by the Senior Management or required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to Antra, Inc., or its customers or suppliers if disclosed. It includes information that suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

#### **4.11 Solicitation And Distribution Of Literature**

In the interest of efficiency and security, the company's general policy is to restrict solicitations or distributions by employees to non-work areas during



non-work time. Employees are prohibited from soliciting or distributing literature in work areas or during work time. Solicitation or distribution of literature of any kind by non-employees is not permitted on company premises at any time.

## 4.12 Image/Dress Code/Personal Appearance

### 4.12.1 Antra, Inc. Corporate Office

**Monday through Thursday:** The properly groomed and attired employee helps to create a favorable image for the Company. Employees should dress professionally and appropriately during normal business hours, and present a neat, well-groomed, business-like appearance (collared shirts/blouses, sweaters, full-length pants or appropriate-length skirts/dresses – no t-shirts, tank tops, jeans, shorts or mini-skirts). If you report working improperly dressed or groomed, your supervisor or manager, at his or her discretion, may instruct you to return home (unpaid) to change clothes or take other appropriate action.

**Friday:** Business Casual – Employees may dress more casually than normally practiced, but must still maintain a business-appropriate, neat, well-groomed appearance.

### 4.12.2 Dress Code – Client Site

Must follow appropriate attire/dress code of the client site

Any employee who believes his/her religious beliefs may require a deviation from the Company's dress code should communicate his/her concerns to the HR Department so that a determination of a possible accommodation may be made.

### 4.12.3 General Apparel Policies

1. All shirts and pants must be neatly pressed or free of wrinkles.
2. All clothing must be in good repair. If a shirt is in disrepair, the employee must mend the garment or purchase a new one.
3. All shirts must be tucked inside the employee's trousers or jeans.
4. The "tucked in" rule may be rescinded on an individual basis due to medical, physical, or personal reasons. Please see your direct supervisor discuss this issue.
5. Employees are allowed one set of earrings only. All other visible body piercings must be removed while at work.



## 5. Employee Relations and Communications

### 5.1 Training and Assistance

Antra, Inc. occasionally conducts programs designed to provide new skills or enhance existing skills. These programs are provided for management, and for individuals who consistently demonstrate a leadership capacity in the workplace and express an interest in career advancement. Your supervisor can advise you which programs are most applicable to you. The company reserves the right to administer this plan at its discretion and if necessary, to modify this plan with or without notice.

Antra, Inc. takes a positive approach towards providing employees with a supportive environment for personal and professional growth and therefore makes available resources and opportunities for training and development.

If you voluntarily separate your employment with Antra, Inc., or are terminated for reasons of cause (such as for gross misconduct, poor performance, etc.) within one year of receiving any reimbursement for training & development events or if the Company incurred any expenses for Company-provided training & development on your behalf, you are required to reimburse all applicable costs incurred in your final 12 months of employment.

### 5.2 Orientation Program

Antra, Inc. provides Orientation to assist new employees in adjusting and acclimating to their jobs and work environment. A Corporate Orientation is held with the new hires, once a month, and is moderated by the HR Department. The main objective of the Corporate Orientation is to provide a

new employee with the necessary information to help the employee understand Antra, Inc.'s culture, history, mission, benefits, and policies, and processes. Specific project orientation is the responsibility of the Program Manager, Supervisor, and teammates.

The Orientation Program may also include specific job-related or corporate-mandated training and/or certifications, that is necessary for an employee to fully perform his or her duties and responsibilities.

5.3 Important Contacts

Category	Details	E-mail Address	Phone number
HR Team	HR and Benefits Questions	hr@antra.com	703-991-4500
Immigration Team	Queries related to H1B or LPR	immigration@antra.com	703-982-7230
Financial Team	Queries regarding your salary and paychecks	accounts@antra.com	703-988-6377
Sales Team	Queries related to your project	Antra_sales@antra.com	703-722-6956
Technical Support	In case your face technical difficulties on the project	support@antra.com	703-872-7277



## 6. Employee Development and Advancement

### 6.1 Promotions, Career Advancement and Planning

Antra, Inc. selects, and places employees based on job-related qualifications without regard to race, color, sex, sexual orientation, age, religion, national origin or medical or physical disability, marital status or handicap, or any other classification protected by law.

Antra, Inc. encourages employees to apply for higher-level positions or lateral transfers for which they qualify. Employees must have a good performance, attendance, and punctuality record. Employees who have active disciplinary actions on file, or are on suspension or in their introductory period, are not eligible to apply for open positions.

When evaluating you for promotion, several factors including job performance, job-related qualifications, educational background, flexibility, and experience with the Company and our industry are considered.

### 6.2 Performance Evaluations

We work closely with all employees to help them perform to the best of their abilities. All full-time employees are provided with an annual performance review. Performance reviews are conducted at the end of every calendar year. Each manager is responsible for the timely and equitable assessment of the performance and contribution of subordinate employees. Any employee assigned to work at a third-party location will have an assigned mentor and will be required to submit a Bi-Weekly report to their manager at Antra, Inc. The report will be reviewed by the manager and discussed with the employee within 7-10 business days from the day of the submission. Your supervisor will be able to discuss how your job performance will be evaluated.

## 6.3 Referral Program

Hiring the right people, efficiently and effectively, is a major factor in ensuring our future. At Antra, Inc., we want you to benefit from our success and have put into place a monetary bonus program for employee referrals and project leads!

### 6.3.1 Employee Referral Program

Antra, Inc. is always looking for qualified computer professionals to work on our numerous projects and we award eligible employees for recommending qualified candidates, other than themselves, who are hired. You can earn up to \$500 just by helping us with our search! Please use our website to submit your referral - <https://antra.com/employee-referral/>

If the resume is not in our database already, you become eligible for the referral reward. If Antra, Inc. employs your referrals for any project you receive \$500 as a bonus after the newly hired has completed their hiring process with Antra, Inc.

### 6.3.2 Project Lead Referral

Antra, Inc. is always looking for new positions and projects to work on. You can earn up to \$500 by directing the new project requirements to Antra, Inc. helping us with our business! You can receive \$500 as a bonus if another Antra, Inc.'s employee is placed in the position of your reference and has completed 90 days.

### 6.3.3 Eligibility and Conditions of Referrals

All Antra, Inc. employees are eligible to receive a referral bonus, except for the following:

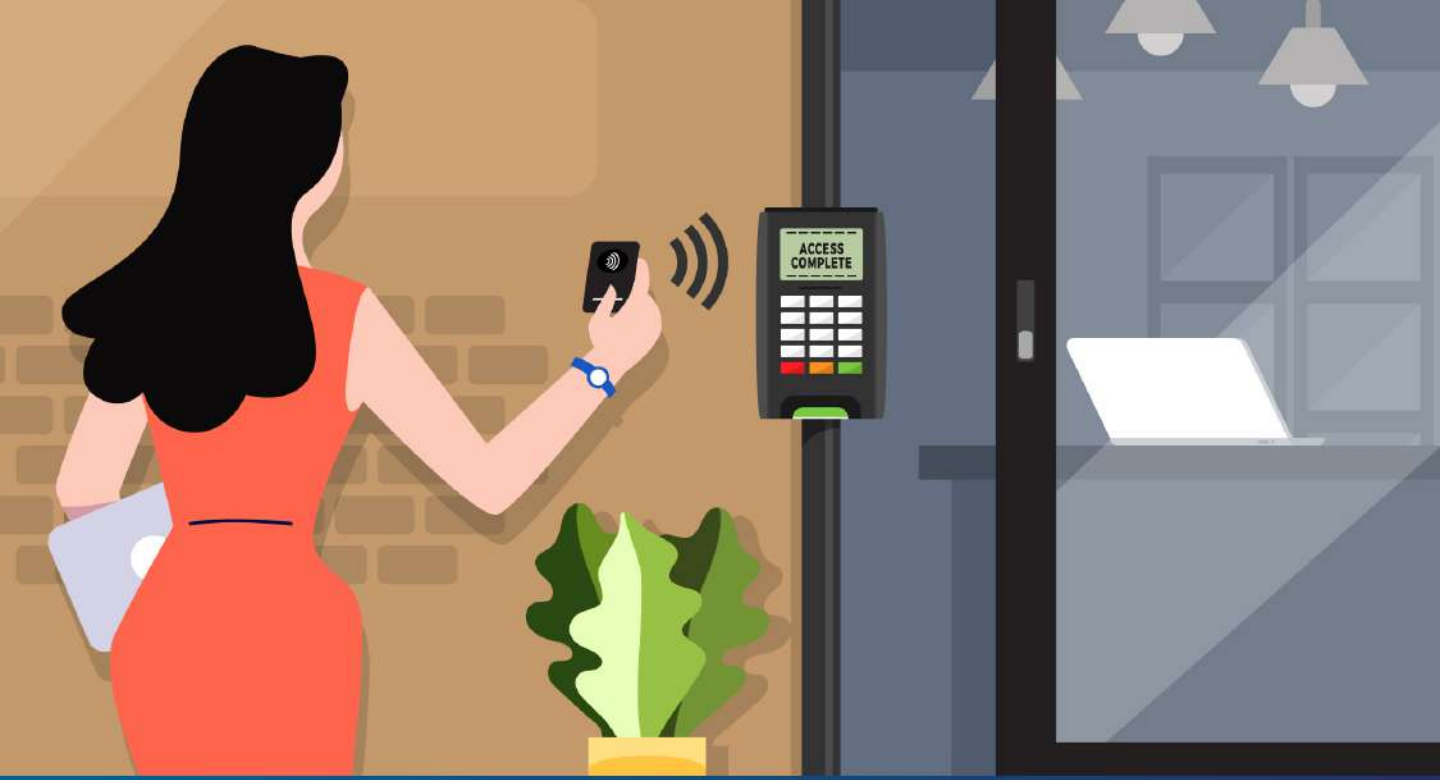
1. All respective hiring managers, direct supervisors, manager-level staff, and upper-level management are not eligible to receive referral bonuses.
2. Recruiting Group staff is not eligible to receive referral bonuses for any Antra, Inc.'s position, as it is part of their jobs to identify and recruit talent.
3. Please note that the employee will be paid only if he/she is on Antra, Inc. payroll at the time of receiving the referral bonus, and the employee has completed the appropriate referral form and followed the procedures of that policy.

### 6.3.4 Conflict Of Interest for Referrals

Referrals at existing clients are welcome but must be handled carefully so as not to create a conflict of interest. Many of our clients rightfully have published policies prohibiting consultants from pursuing business opportunities while at the client site or "on the clock".

Recognition for sales leads at existing clients will be handled on a case-by-case basis at the discretion of the sales head and senior management. Additionally, for some clients, you may not act on the company's behalf beyond facilitating an introduction.





## 7. Attendance and Leaves of Absence

### 7.1 Employee Status and Classifications

The Fair Labor Standards Act (FLSA) provides minimum wage, overtime pay, record keeping, and child labor standards. Antra, Inc. is committed to upholding all the requirements put forth under the FLSA. There are two classifications of employees determined by the FLSA: "exempt" or "non-exempt."

**Exempt Employees:** Exempt employees, as defined under the FLSA, are subject to only certain State and Federal Wage and Hour Laws and do not receive overtime pay. To be considered exempt from the FLSA's minimum wage and overtime pay requirements under the FLSA, employees must meet certain criteria related to their primary job duties and level of responsibility.

**Non-Exempt Employees:** Non-exempt employees are subject to all provisions of State and Federal Wage and Hour Laws. Non-exempt employees are eligible for and will receive, overtime compensation when working more than forty (40) hours during a given calendar/workweek.

Non-exempt employees earn overtime pay at the rate of one and one-half times the employee's regular rate of pay for all hours worked more than 40 in a workweek. All overtime must be authorized in advance by the employee's supervisor or appropriate management. Employees may be required to work overtime as requested by their Supervisor. Leave (whether paid or unpaid) and Holidays do not count toward the accumulation of 40 hours for overtime purposes.

## 7.2 Categories of Employment

Employees are considered regular if they are employed in positions for a period greater than one (1) year in duration. Employees (including Interns) are considered Temporary if they are employed in positions that last less than one (1) year. Employees are considered Casual if they are employed in positions that work less than 1000 hours per year.

**Full-time employees** are regularly scheduled to work 40 or more hours per week. Part-time employees are regularly scheduled to work any number of hours per week that is less than 40 hours per week.

**Regular, full-time employees** who work 40 hours or more per workweek are eligible to participate in all Company-sponsored benefits programs, once they satisfy the qualification criteria of each benefit.

**Regular, part-time employees** who work less than 40 hours per workweek, but greater than 30 hours per workweek are eligible for all Company-sponsored benefits programs and pro-rated leave accruals, once they satisfy the qualification criteria of each benefit.

**Temporary employees**, whether full-time or part-time, are not eligible for Company-sponsored benefits programs, Holidays, or any Leave programs. All temporary employees must have a fixed end date. An employee can only remain in this status for up to 12 months. After 12 months of continuous service, a temporary employee must be made a regular full-time or part-time employee.

**Casual employees** are not eligible for Company-sponsored benefits programs, Holidays, or any Leave programs.

**Intern employees** – Interns can be paid or unpaid employees. Interns can work for the company for a fixed period, usually between a month and three months. Interns are usually undergraduates or students

## 7.3 Hours of Work

A work schedule is defined as the 7 days from Monday through Sunday. The standard workday for full-time employees consists of working normally 8 hours per day or 40 hours per week. This may be realized as nine hours with one hour for lunch or an 8-1/2 hour period with one half-hour for lunch. Both exempt and non-exempt employees should adhere to a normal work schedule that corresponds with their category of employment (i.e. full-time or part-time).

The working hours of exempt employees may be subject to change according to overall needs and the special responsibilities of their position. Employees working at client sites are expected to be sensitive to the clients' needs and adjust their schedules accordingly. Supervisors and/or Managers will review available options and establish normal work schedules with employees.

### **7.3.1 Core Hours of Employees – Corporate Office**

Core hours are between 9.30 AM and 4.30 PM, meaning that all persons who work in the Corporate Office should be at the worksite during these core hours. If an employee cannot report to work on time, he/she should call their immediate supervisor one hour before the scheduled start time on each day of absence or tardiness. If the employee is unable to reach their immediate supervisor, he/she may try to contact his/her one-above supervisor or Human Resources.

### **7.3.2 Core Hours of Employees – Client Site**

Please follow the policies and guidelines appropriate to the Client Site. Client Site employees should inform both their Client (or Client Site Supervisor) and their Antra, Inc. The supervisor or one-above supervisor one hour before their scheduled start time on each day that they are going to be late or miss work.

### **7.4 Flexible Hours**

Antra, Inc. supports flexible work schedules provided that the schedules are pre-approved, and correspond with one's tasks, duties, and responsibilities, and should not negatively impact a work environment. All flexible schedules should be conducive to increased productivity, efficiency, and the best possible teamwork or overall performance. To coordinate a flexible schedule, employees should contact their supervisors.

### **7.5 Pay Periods**

Antra, Inc. utilizes a bi-weekly pay period for all employees

### **7.6 Deductions from Pay**

Antra, Inc. strictly prohibits making improper payroll deductions. However, there are certain allowable deductions from an employee's pay. An employee's regular pay may be reduced withheld or deducted for any of the following reasons (as allowed per any applicable State, local, or Federal laws):

1. For court order or wage garnishment as required by Federal and/or State laws (e.g. taxes, social security, F.I.C.A.)
2. For unpaid leave of absence under the Family and Medical Leave Act (FMLA) (for full-time exempt employees in full-day increments only)
3. For unauthorized overpayments
4. To cover the employee portion of voluntary benefits such as medical/dental/vision insurance, optional life/AD&D insurance, and other voluntary benefits
5. For personal absences taken before meeting the eligibility requirements of the PTO plan (for full-time exempt employees in full-day increments only)
6. To offset amounts employees, receive as jury or witness fees, or for temporary military duty pay
7. For penalties imposed in good faith for infractions of safety rules of major significance
8. For unpaid disciplinary suspensions of one or more full days (for exempt employees) or partial and/or full days (for non-exempt employees) imposed in good faith for workplace conduct rule infractions
9. In the employee's initial or terminal week of employment if the employee does not work the full week

10.If employment is separated for any reason, then the Company may also deduct any outstanding amount against any money owed to the employee, subject to applicable law. If the payroll is not enough to cover the full amount owed, the Company reserves the right to pursue other remedies under the law to permit collection in full

## 7.7 Complaint Procedure for Salary

Antra, Inc. is committed to observing the salary basis requirements of the FLSA. However, if an employee believes his or her salary has been improperly reduced, the employee should follow this procedure to ensure any such reduction was not unlawful.

**Notification Procedure:** Any employee who believes that Antra, Inc. has made an improper deduction from his or her salary should immediately (or as soon as possible) notify the Payroll Department in writing of the date of the payroll in which the reduction occurred, the amount of the reduction, and the reason given on the pay stub (if any) for the reduction.

**Investigation of Complaint:** The Payroll Department will investigate all complaints and will decide as to whether the deduction from salary was lawful. The result will be communicated to the employee in writing. If it is determined that Antra, Inc. has made an improper pay deduction, Company will reimburse the employee the amount of the improper deduction and will take steps to ensure that such improper deduction does not occur again in the future. If it is determined that Antra, Inc.'s reduction of salary was lawful, the employee may appeal that decision to the Supervisor or Manager who shall review the matter and make a final decision as to whether the deduction was permissible under the FLSA.

**Non-Retaliation:** No employee will be retaliated against for making a complaint or assisting with the investigation of a complaint. Making a knowingly false complaint, however, may result in disciplinary action, including possible termination of employment.

Antra, Inc. is strongly committed to avoiding improper pay deductions. All complaints will be taken seriously. If you have any questions, please contact the Payroll Department.

## 7.8 Payroll Obligations During Extended Leave

If an employee is on leave of absence and not receiving pay for one or more Antra, Inc. payrolls, such as during extended Leave Without Pay, FMLA, Military Leave, or Short Term Disability or Long Term Disability, then the Company reserves the right to recover the employee portion of all voluntary benefits or another allowable docking of pay for which the employee normally is responsible to cover the employee portion of voluntary benefits such as medical/dental/vision insurance, optional life/AD&D insurance, and other voluntary benefits.

Before or immediately after a need for an employee to be on an extended leave of absence, the employee must elect which method he or she plans to

use to pay for the normal employee deduction amounts; this is done by coordinating with the Payroll Department. The methods to choose from are either by catch-up deduction(s) from payroll(s) after the leave period or by concurrent payments by the employee via personal check or cashier's check during the leave on the normal Antra, Inc. bi-weekly schedule.

If any payment obligation is not paid on agreed upon due date, the employee is required to pay all costs of collection, including reasonable attorney's fees, whether or not a lawsuit is commenced as part of the collection process.

### **7.8.1 Changes in Tax Withholding and other Personal Information**

To change State or Federal Tax withholding exemptions, an employee should complete the appropriate State or Federal Tax withholding form and forward it to the Payroll Department for processing. To change the mailing address, telephone number, the designation of emergency contact, or to update education/degree status, employees can update their Zenefits account or provide the information to the HR Department.

### **7.8.2 Wage Garnishment**

The garnishment of wages is court-granted permission for creditors to collect part of an employee's pay directly from the Company. The Company is legally required to comply with such an order. If garnishment is required, the Payroll Department will contact the employee to explain the details of garnishment and how it may affect his/her wages. The Company encourages employees to settle debts subject to garnishment before implementation.

### **7.8.3 Direct Deposit**

Direct Deposit is a fast and easy way for the Company to make payroll and reimbursement payments directly to an employee's desired bank and/or credit union account (up to 2 accounts). To change, add, or delete a direct deposit arrangement, please contact the Payroll Department for processing.

## **7.9 Record-Keeping, Financial Controls, and Disclosures**

Antra, Inc. requires honest, accurate, and timely recording and reporting of information to make responsible business decisions.

All business expense accounts must be documented and recorded accurately promptly. If you are not sure whether a certain expense is legitimate, ask the Accounting Department.

Employees are required to use the Automatic tracking system provided by the Company to accurately record all hours worked. These time records must be submitted to the Supervisor for approval on each week. It is Company policy and a requirement by law that the timesheets reflect actual hours worked. Timesheets must be fully completed, checked for accuracy, and submitted to the Supervisor for approval every pay period.



## 7.10 Timekeeping

To receive compensation for time worked on the normal Company payday schedule, employees must submit their timesheets on [www.ats.antra.com](http://www.ats.antra.com) within 3 days after the pay period.

1. Employees are not permitted to clock in/out for one another.
2. In the event of a missed clock in or out, a manual adjustment will be made to ensure the employee is paid appropriately.
3. See your manager find out if your job assignment includes scheduled break/lunch periods.
  - Lunch and break periods may not be accrued for overtime or personal time.
  - The scheduled workday may not be altered by not taking designated breaks and lunches unless pre-approved by a manager.
4. Excessive\* misuse\*\* of Time Entry/Reporting will result in disciplinary action.
  - "Excessive" is defined as three or more incidents of misuse during a pay period.
  - "Misuse" is defined as not using Time Entry/Reporting as directed by the Employee Handbook or by the employee's manager.

All timesheets will be reviewed and approved by the employee's manager.

## 7.11 Working Overtime

It is not our policy to require overtime, but occasionally this cannot be avoided. In such instances, an employee may be asked to work after their regularly scheduled shift.

Overtime is defined as hours worked more than 40 hours based on a Monday through Sunday week.

1. Any approved hours worked as Overtime are paid as Extra Allowance.
2. Employees are only allowed to work overtime unless requested or approved by his/her supervisor.
3. Benefit Time (absent hours paid or excused unpaid absences) is not included when calculating overtime hours.

## 7.12 Drive Time

1. Drive time is paid when an employee is required to drive from one job-related location/site to another during a normally scheduled shift.
2. Drive time is not paid when an employee is driving from home to work.
3. Drive time is not paid while an employee is en route to the first site of a non-required/voluntary assignment.
4. Drive time is not paid while an employee is driving home from the last site.

## 7.13 Absences

### 7.13.1 Time-Off Benefits

Time-Off benefits are determined by employment type (i.e. Full Time and or Part-Time), position, and tenure. A list of your time-off benefits is available through your manager.

## 7.13.2 Paid Time Off

### Paid Time Off with Accrual and Carryover Provisions

Antra, Inc believes that its employees are the key to what makes a great company. Although work makes up a large portion of an employee's life, we believe that a balance between work and nonwork activities is essential to maintain quality performance and a positive work atmosphere. To support this philosophy, the company has designed a paid time off (PTO) plan that incorporates vacation, personal and sick leave into one program.

All full-time employees will accrue PTO hours, for every 2080 worked hours there will be 13 Paid days off. For this policy, the year begins on the employee's project start date.

#### Procedures

In addition to vacation, PTO is designed to cover leave for personal sickness, family sickness, family activities, family holidays, or religious holidays. In general, all PTO must be pre-approved by and prescheduled with the employee's supervisor and may be taken in daily increments. Approval for all scheduled time away is subject to application workloads.

Accrued and unused PTO time may be carried over from one calendar year to the next.

Employees will not be able to "sell" unused PTO hours back to the company unless authorized by the company president. If you terminate your employment or if you are terminated, you will be paid for all earned and unused PTO time.

## 7.14 Leave Programs

### 7.14.1 Company Holidays

Antra, Inc. observes seven holidays in a year. Regular full-time employees receive regular pay for Holidays if they are on paid status (i.e., working or on paid leave) during the week in which the holiday falls. Regular part-time employees who are regularly scheduled to work at least 30 plus hours per week and are eligible for all company-sponsored benefits may receive regular pay for Holidays if a Holiday falls on a regularly scheduled workday. Please contact the HR department for the annual holiday list.

**Religious observances.** Employees who need time off to observe religious practices or holidays not already scheduled by the company should speak with their supervisor. Depending upon business needs, the employee may be able to work on a day that is normally observed as a holiday and then take time off for another religious day. Employees may also be able to switch a scheduled day with another employee, or take vacation time, or take off unpaid days. The company will seek to reasonably accommodate individuals' religious observances.

### 7.14.2 Unexpected Absences

Employee responsibility during unexpected absences: Employees are responsible for notifying their direct Antra, Inc. supervisor and client (client Rep) before 9:00 AM on each day of unexpected absence due to illness, injury, or other personal matter, and to inform their Antra, Inc. supervisor and client (client Rep) of their status daily and expected date of return. If PTO is available, the employee must use

PTO during periods of an unexpected absence. Medical documentation of illness will be required in cases of absences of two (2) or more consecutive days of an unexpected absence. Failure to inform the company/client of unexpected absence for three (3) or more consecutive days may be considered the employee's withdrawal of employment unless there are extenuating emergency-related circumstances that can be explained and acceptably documented. In the event of any known or reasonably suspected abuse, this will result in disciplinary action, up to and including termination of employment.

### 7.14.3 Leave without Pay

There may be times when an employee requires being absent from work and he or she does not have or is not eligible to use any Paid Leave. In these instances, an employee may record Leave without Pay, and the approval is at the discretion of management. **Generally, leave is restricted to no more than two (2) consecutive weeks; any leave over two (2) consecutive weeks requires approval from the Senior Management. Antra, Inc.** may lawfully make deductions for full-day absences of exempt employees, and partial- and full-day absences of non-exempt employees, due to personal reasons (such as vacation or personal appointments), sickness or doctor's visits, or disability (including work-related accidents), or if wage replacement benefits are exhausted or otherwise provided under a State or Company disability insurance program or a State or Company workers' compensation program. For more information, please see Deductions from Pay section.

### 7.14.4 Exceptions

If the subpoena compels a court appearance in a court case in which you are a named party (a plaintiff or a defendant), then any full-day absence will be unpaid (for exempt employees), and any full or partial day absence will be unpaid (for non-exempt employees). Alternatively, all eligible employees may use accrued PTO to compensate for full and/or partial day absence.

If you are named individually as a defendant in a case against Antra, Inc. under your status as Antra, Inc. supervisor, then Antra, Inc. may pay for the entire absence.

## 7.15 Leave of Absence

### 7.15.1 Family and Medical Leave Act (FMLA) Of 1993 – Basic Information

Antra, Inc. may grant a Family and Medical Leave Act (FMLA) leave of absence to employees who have completed at least one full year of service with the Company and who have worked at least 1,250 hours in the 12 months preceding the leave. Any employees not satisfying the requirements under FMLA may apply for a leave of absence subject to the conditions of the personal leave policy.

Occurrences covered under FMLA Leave: Employees meeting the requirements mentioned above may request leave of absence for any of the following reasons:

1. Birth of a child (including prenatal care) and to care for the newborn child;
2. Placement of a child for adoption or foster care;
3. To care for a spouse, child/dependent or parent of an employee with a serious health condition;
4. To deal with the employee's own serious health condition that renders the employee unable to perform the essential functions of their job;
5. For certain qualifying exigencies arising out of the fact that an employee's spouse, son, daughter or parent is a covered military member on active duty, or notification of an impending call or order to active duty status, in support of a contingency operation
6. The care of a covered servicemember with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin, of the service member.

A "serious health condition" is an injury, illness, impairment, or physical or mental condition that renders the employee incapable of performing the essential functions of the job and involves:

1. Any period of incapacity or treatment that requires inpatient care or continuing treatment requiring periodic visits to a health-care provider;
2. An absence for more than three calendar days requiring treatment by a health care provider;
3. Any period of incapacity due to pregnancy or for prenatal care;
4. Any period of incapacity due to a permanent or long-term condition for which treatment is not effective or an absence to receive multiple treatments by a health care provider for restorative surgery or a condition that would likely result in more than three days' absence if not treated.

**Amount of FMLA Leave Available:** An eligible employee may take up to 12 workweeks of unpaid leave during the "12-month calendar period" for anyone or a combination of the above situations, or up to 26 weeks of leave in a single "12-month period" to care for a covered servicemember recovering from a serious injury or illness incurred in the line of duty on active duty. When eligible employees are required to take FMLA to leave to care for a covered servicemember with a serious illness or injury in the same twelve-month period that they also need to take FMLA to leave for any other qualifying reason, employees are limited to a combined total of up to 26 weeks of FMLA leave during the single 12-month period. (Only 12 of the 26 weeks total may be for an FMLA-qualifying reason other than to care for a covered servicemember.) The "12-month period" in which the 12 workweeks of FMLA leave may be taken is a

rolling 12-month period measured backward from the date an employee commences any FMLA leave. FMLA leave for childbirth or placement must conclude within 12 months after the birth or placement of the child.

**Concurrent paid leave:** The eligible employee is required to use any accrued paid leave time including personal leave and qualifying disability leave available for one of the above-described FMLA purposes in conjunction with their FMLA leave. Once these benefits are exhausted, the balance of leave will be without pay.

Husband/wife are both employed by Antra, Inc. If both spouses are employed by Antra, Inc., the combined FMLA-leave entitlement is a total of 12 weeks within the “12-month period” for any birth, placement or to care for a parent with a serious health condition; and a combined FMLA-leave entitlement of 26 weeks to care for a covered servicemember with a serious injury or illness. The combined FMLA leave entitlement can be split between them in any proportions. This leave will be charged against that employee's available 12 weeks of FMLA leave for his/her serious health condition or to care for a child or spouse with a serious health condition. If the leave is requested because of the serious health condition of a child or other spouse or because of a qualifying exigency, each spouse is entitled to 12 weeks of FMLA leave.

**Intermittent leave:** For leave due to the employee's serious health condition or that of a spouse, child or parent of an employee and where such leave is certified as medically necessary, eligible employees may take unpaid leave intermittently or as reduced-schedule leave subject to the maximum of 12 weeks within 12 months.

Intermittent leave for childbirth or placement may only be taken with prior approval from your supervisor.

**Requests:** Employees should request FMLA leave to the HR Department.

1. If the leave is foreseeable in advance, you should provide notice at least 30 days in advance of the requested leave.
2. If the leave is unforeseeable, you should notify Antra, Inc. as soon as practicable of the need to take leave (normally within one or two business days).

If the employee does not comply with these requirements, FMLA leave may be delayed or denied.

After notice is given, Antra, Inc. will notify you that the leave has been designated as FMLA. In an effort not to disrupt the Company operations unduly, you are expected to make a reasonable effort to schedule foreseeable planned medical treatments.



**Medical Certification:** If you are seeking leave for any medical purpose you will be required to submit the appropriate medical documentation to the HRD at the following times:

1. Initial request.
2. Before returning to work (following a serious health condition to certify fitness for duty).
3. If you are not returning to work following a leave during which the Company has paid healthcare premiums and/or
4. Re-certification regularly during the leave.

Antra, Inc. may seek clarification through its provider and/or require you to undergo a second independent medical examination by an Antra, Inc. designated provider, if necessary, at Antra, Inc.'s expense.

### 7.16 Insurance Coverage While on Leave

1. While the employee is on FMLA leave, it is the employee's responsibility to continue making premium payments to maintain insurance coverage(s). This may be done either through payroll deductions if there is income or by personal check or cashier's check if Antra, Inc. is unable to payroll deduct the employee's portion of insurance premiums. At Antra, Inc.'s discretion, Antra, Inc. may pay the employee's share of the premiums during FMLA leave and recover premiums upon employee's return to work. In this case, when the employee returns to work, Antra, Inc. will recover costs incurred for paying the employee's share of such insurance premiums by doubling the *current* insurance deduction until the balance due is paid back.
2. If the employee elects not to return to work upon completion of an approved leave of absence, in some instances, the Company may recover from the employee the cost of payments made to maintain the employee's health coverage.
3. Employees on FMLA leave may not be employed by or perform significant services for any other entity. Failure to adhere to this requirement will result in appropriate disciplinary action, up to and including termination of employment.

**Reinstatement:** Eligible employees are entitled to return from leave to reinstatement to their former position or an equivalent position with equivalent employment benefits, pay, and other terms and conditions of employment. Exceptions to this provision may apply if business circumstances have changed, e.g., if the employee's position is no longer available due to job elimination. Exceptions may also apply for certain highly compensated employees under certain conditions.

### 7.16.1 Workers Compensation Leave Of Absence

Workers' Compensation Insurance protects you in the event of injury or illness resulting directly from work. When a claim is approved, this insurance generally covers most medical bills, provides a statutory benefit payment that varies by State, as well as a death benefit.

Any benefit received from Workers' Compensation Insurance is used as an offset to any benefit payable from the Company.

You must notify your supervisor and the executive office immediately if you are injured on the job.

All workers' compensation leaves of absence that also qualify under the FMLA will count against the 12-week FMLA entitlement. Additional leave may be permitted for employees injured at work.

### 7.17 Requesting a Leave of Absence

All requests for a Leave of Absence should be submitted on <https://www.ats.antra.com>.

### 7.18 Absenteeism

Antra, Inc. places a high value on attendance. We expect and need employees to be at work on time on their scheduled workdays. Regular attendance and punctuality are important because they affect an employee's productivity and ability to meet goals, standards, and deadlines. Absent employees adversely affect Company morale since co-workers must absorb the absent employee's workload in addition to their own. Consequently, the level of service we provide to our customers is diminished. Our policy is to address and correct attendance patterns that are especially counterproductive and disruptive, while tolerating normal patterns of absences caused by occasional illness, emergencies, etc.

### 7.19 Absentee Notification Policy

Failure to comply with the following notification requirements may subject an employee to corrective action or termination.

1. If it becomes necessary for an employee to miss work, they are required to notify their supervisor at least two hours before their scheduled starting time or as soon as possible.
2. When calling in, you must state why you are absent, what benefit you are using, and a phone number you can be reached for questions regarding your job.
3. Where the need for absence is foreseeable, as for planned medical treatments, the Company should be notified thirty days in advance or as soon as the employee knows that he or she will miss work.
4. "No Call No Shows" will be considered job abandonment.

## 7.20 Attendance Policy

Employees who have suspicious patterns\* of non-FMLA related absences and excessive\*\* incidents of the following types of non-FMLA related absences may be subject to corrective action or termination.

1. Employee/Family Care (E/FC)
2. Hospital Employee Care (HEC)
3. Absent Without Benefit (AWB) - If an employee is absent on a scheduled working day without utilizing a Time-Off Benefit, they are considered "Absent without Benefit" (AWB); AWB days/hours/minutes include tardiness and "no call no shows."

\* Examples of a Suspicious Pattern of absenteeism would be frequently using E/FC benefit on Mondays, repeatedly failing to report absences before shift start time, or missing a day of work during the first week of employment.

\*\* For Full Time employees, "Excessive" means the monthly average of absent hours is equal to or greater than eight.

\*\* For Part-Time employees, "Excessive" means the monthly average of absent hours is equal to or greater than the Total Weekly Hours Scheduled Divided by the Total Number of Weekdays Scheduled.

The monthly average is calculated by using 12 months, rolling backward. If an employee has not yet been with the Company for a full year, a monthly average of absences will be calculated by dividing the total number of non-FMLA related E/FC HEC and AWB hours by the number of full months they have worked.



## 8. Compensation and Benefits

### 8.1 Benefits Package

Full-Time Employees, working 30+ hours are eligible for our competitive benefits package that fit your needs. For more information please contact the HR Department.

### 8.2 Visa Sponsorship

In the case of non-US citizens, the offer of employment is subject to the terms and conditions stipulated in the Offer of Employment letter.

### 8.3 Pay

1. Pay periods are in bi-weekly basis. Pleaser refer to out annual payroll schedule for more details.
2. Please make sure all the timesheets are submitted every week.
3. Each pay normally compensates employees for hours worked that were claimed at the end of the last pay period.

#### 8.3.1 Paychecks

1. Eligible Employees have the option to have their pay directly deposited into their checking or savings account.
  - Employees must complete their Zenefits account to receive Direct Deposit.
  - On payday, employees using Direct Deposit will receive a pay stub/report, instead of a paycheck.

#### 8.3.2 Deductions

The only deductions from your paycheck are those required by law or authorized in writing by you. Your pay stub identifies each deduction and should be kept as a permanent record.

#### 8.3.3 Increment / Performance Evaluation

Raise/Increment is usually determined by tenure. They may also be determined by an increase in current responsibilities. It is important to realize that a raise/increment may not occur if adverse economic or financial conditions exist.



## 9. Health, Safety, and Security

Antra, Inc. strives to provide each employee and officer with a safe, healthy, and secure work environment. Each employee and officer have responsibility for maintaining a safe, healthy and secure workplace for all employees and officers by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted.

To this end, Antra, Inc. makes every effort to comply with relevant Federal and State occupational health, safety, and security laws and to develop the most feasible operations, procedures, techniques, technologies, and programs conducive to such an environment. To accomplish these objectives, you are expected to perform your work diligently, maintain a safe, healthful, and secure working environment and adhere to the proper operating procedures and practices designed to prevent injuries and illnesses. You should report any unsafe conditions or behaviors encountered in the workplace.

Employees and officers are expected to perform their work safely, free of the influences of alcohol, illegal drugs, controlled substances, or medications that may present unreasonable safety or security concerns to either the employee taking the medication or to this/her peers thereby causing undue hardship to the company. The use of illegal drugs in the workplace will not be tolerated. It is important to follow all health, safety, and security measures prescribed by the Company.

You are required to immediately notify Antra, Inc. management of any injuries that occur on the job or customer property.

You should be aware of all emergency exits and the location of any emergency equipment in your office and who will be in charge in case of a fire or other disaster.

### 9.1 OSHA Safety and Workplace Injuries/Accidents

All workplace accidents and injuries, regardless of the severity of the event,



must be reported to the HR Department, either via project manager, peer or directly to an HR Department representative. The HR Department will help the Employee submit a claim for worker's compensation filing and provide the employee with the appropriate direction regarding seeking medical attention, recording of hours on the timesheet, and payment of medical-related costs. Antra, Inc. complies with all OSHA injury reporting and tracking guidelines.

## **9.2 Tobacco Use in the Workplace**

Antra, Inc. is a smoke-free environment. In keeping with this commitment, employees who use tobacco products (cigars, cigarettes, etc.) are asked to confine such use to designated areas outside of the building. The individual Clients establish the standards in this area for Client sites and employees are expected to comply.

## **9.3 Protection and Proper Use of Company Assets**

All employees and officers should protect Antra, Inc. assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Antra, Inc.'s profitability. All Antra, Inc. assets are to be used for legitimate Company purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. Antra, Inc.'s assets should not be used for non-Company business.

The obligation of employees and officers to protect Antra, Inc.'s assets includes Antra, Inc.'s proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Antra, Inc.'s policy. It could also be illegal and result in civil or criminal penalties.

## **9.4 Federal Civil Claims Act**

Antra, Inc. will ensure that all employees are aware of and understand the Federal False Claims Act, which prohibits any "person" from:

1. Knowingly submitting a false or fraudulent claim for payment to the federal government or causing such a claim to be submitted,
2. Knowingly making or using a false record or statement to secure payment from the federal government for a false or fraudulent claim or causing such a false record or statement to be made or used, or
3. Conspiring to get a false or fraudulent claim paid by the federal government.

The federal False Claims Act permits a person with knowledge of fraud against the United States Government, referred to as the "qui tam plaintiff," to file a lawsuit on behalf of the Government against the person or business that committed the fraud (the defendant).

## **9.5 Financial Reporting**

Antra, Inc.'s policy is to comply with all financial reporting and accounting regulations applicable to Antra, Inc. If any employee or officer has concerns or complaints regarding accounting or auditing matters of Antra, Inc., then he or

she is encouraged to submit those concerns by one of the methods described in the clause titled "Compliance Procedures".

## 9.6 Compliance Procedure

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations, it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, we must have a way to approach a new question or problem. These are the steps to keep in mind:

1. Make sure you have all the facts. To reach the right solutions, we must be as fully informed as possible.
2. Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
3. Discuss the problem with your Supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your Supervisor's responsibility to help solve problems. If you are uncomfortable discussing the problem with your Supervisor you can talk to HR or Senior Management.
4. You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. Antra, Inc. does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations.
5. Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.
6. All employees and officers are subject to Antra, Inc. Code, which describes procedures for the internal reporting of violations of the Code. All employees and officers must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this Code by any employee or officer will result in disciplinary action, up to and including termination.

## 9.7 Inspection of Company Facilities

To safeguard the workplace and the employees, and to assure efficiency and maximize productivity, the Company reserves the right, in its sole discretion and without notice to employees, to inspect, monitor or otherwise enter or search any office, desk, file, locker, closet or any other enclosed or open area in Company facilities and Company job sites (where permitted to do so) and to monitor or inspect any items found within such locations.

## 9.8 Personal Property

Antra, Inc. accepts no responsibility for personal property that may be brought to or stored on Company facilities, and such property may be inspected or monitored in the ordinary course of conducting business. Accordingly, you should not keep or maintain any personal property or information in Company facilities that you expect to be kept private and confidential. In this connection, it should be noted that all Antra, Inc. offices, desks, paper files, electronic/computer files, closets, vehicles and so forth, are the property of Antra, Inc. and the Company reserves the right to inspect any packages,

parcels, handbags, briefcases, or any other possessions or articles carried to and from Company facilities and Company job sites (where permitted to do so).

## **9.9 Work Area**

A neat and orderly work area makes for a more pleasant, productive, and safe place to work. You are expected to keep your surroundings clean and presentable in courtesy to fellow employees and customers who may personally visit your work location.



## 10. Separation from Employment

### 10.1 Resignation Policy

Although Antra, Inc hopes that employment with the company will be a mutually rewarding experience, it is understood that varying circumstances do cause employees to voluntarily resign employment. Should this time come, employees are asked to follow the guidelines below regarding notice and exit procedures.

#### Procedures

1. Notice of resignation. Employees are encouraged to provide two weeks' notice to facilitate a smooth transition out of the organization. If an employee provides less notice than requested, the employer may deem the individual to be ineligible for rehire depending on the circumstances regarding the notice given.
2. All resignations must be confirmed in writing. Employees may send a Resignation letter that must include the reason for leaving and the effective date.
3. Resignation for failure to report to work. Employees who fail to report to work for three consecutive days without properly communicating to their supervisor or manager the reasons for their absence will be viewed as voluntarily resigning their employment as of the third day.
4. Eligibility for rehire. Employees who resign in good standing under this policy and whose documented performance is above average under the organization's performance management system will be eligible for reemployment.
5. Employees will be required to complete the exit procedures and go through an exit interview.
6. Employees who fail to return any company property, including keys, credit cards, tools, uniforms, cellular phones, laptops, and other equipment, will be deemed ineligible for rehire and may be subject to legal proceedings on behalf of Antra, Inc.
7. The final payment will be processed according to the company payroll schedule. Accrued but unused vacation will be paid out consistent with the

## 10.2 Suspension

Suspension, or release from duty, is a more severe action that may be used to continue investigations and/or for constructive improvement, or for when an employees own or another's safety and security may be jeopardized. Suspensions are issued when it is determined that a second warning would not suffice or that an initial incident is too severe for a warning yet not sufficiently severe for dismissal. Suspensions may vary in length, according to the severity of the offense or deficiency. Where a suspension has failed to produce the proper results, consideration should be given for a lengthier suspension or the dismissal of the employee. Suspensions may be paid or unpaid, depending on the actual circumstances.

## 10.3 Separations

An employee's employment may be discontinued after other disciplinary measures have failed or when a first-time incident occurs that is serious enough to warrant such a decision. An employee may be separated from employment at any time without regard to any progressive steps if he or she commits an offense for which immediate discharge is specified as a penalty or if, in Antra, Inc.'s judgment, the employee's continued presence would be contrary to the well-being of Antra, Inc. or its employees.

## 10.4 Behaviors That May Result in Disciplinary Action

Employees are prohibited from engaging in conduct listed below and will result in disciplinary action which can go up to termination. This list has been established to provide examples of behavior that could warrant a range of disciplinary actions. Appropriate levels of disciplinary actions will be based on the severity of employee behavior. This list is not exhaustive.

1. Displaying disrespectful and/or inappropriate behaviors toward a fellow employee or supervisor
2. Refusing to do assigned work or failing to carry out the reasonable assignment of a manager, supervisor or department head
3. Being inattentive to duty, including sleeping on the job
4. Falsifying a time card or other Antra, Inc. record or giving false information to anyone whose duty is to make such record
5. Being repeatedly or continuously absent or late, being absent without notice or reason satisfactory to Antra, Inc. or leaving one's work assignment without appropriate authorization
6. Smoking within no-smoking areas or no-smoking operations or any area of Antra, Inc. that must be entered for the conduct of Antra, Inc. business Conducting oneself in any manner which is offensive, abusive or contrary to common decency or morality; carrying out any form of harassment including sexual harassment
7. Having an unauthorized weapon, firearm or explosive on Antra, Inc. or client property



8. Computer abuse, including but not limited to, plagiarism of programs, misuse of computer accounts, unauthorized destruction of files, creating illegal accounts, possession of unauthorized passwords, disruptive or annoying behavior on the computer and non-work-related utilization of computer software or hardware
9. The conviction for a felony
10. Misusing or willfully neglecting Antra, Inc. property, funds, materials, equipment or supplies
11. Unlawfully distributing, selling, possessing, using or being under the influence of alcohol or drugs when on the job or subject to a duty
12. Interfering in any way with the work of others
13. Stealing or possessing without authority any equipment, tools, materials or other property of Antra, Inc. or attempting to remove them from the premises without approval or permission from the appropriate authority
14. Marking or defacing walls, fixtures, equipment, tools, materials or other Antra, Inc. property, or willfully damaging or destroying property in any way
15. Willful violation of safety rules or Antra, Inc. policies

Receipt and Acknowledgement

By signature below, I acknowledge receipt of Antra, Inc.'s Employee Handbook and acknowledge that I have read and understood the Company's policies and benefits addressed in the Employee Handbook, including the Acknowledgement section, and agree to comply with the terms and conditions contained in the Antra, Inc.'s Employee Handbook. I understand that this Handbook supersedes and replaces all previous statements on the Handbook. I acknowledge that I am expected to read this Handbook and to adhere to Company standards. I agree that I will familiarize myself with the material in this Employee Handbook.

I understand that this Employee Handbook is not an employment contract. I understand that Antra, Inc.'s customs and traditional business practices, as well as statements contained in other Company materials such as the offer letter I may have received, employment agreement, memoranda, performance appraisals, and disciplinary action documentation, do not create an express or implied contract or right of any kind. I acknowledge that Antra, Inc. reserves the right to change, revise, rescind, and make exceptions to the standards, practices, procedures, and benefits described in this Handbook or elsewhere without notice.

I further understand that Antra, Inc. reserves the right to change, modify or eliminate any or all of the policies, benefits, and rules and regulations contained or described in the Employee Handbook as it deems appropriate. I also understand that my employment is not guaranteed for any specific period and that nothing in this Employee Handbook creates an express or implied contract of employment. I further understand and agree that my employment with Antra, Inc. is at-will, meaning either Antra, Inc. or I may terminate the employment relationship at any time, with or without cause and with or without notice.

I am aware that, during my employment, confidential information will be made available to me. I understand that this information may be critical to Antra, Inc. or with non-Antra, Inc. personnel. I agree that if my employment with Antra, Inc. is terminated either voluntarily or involuntarily, I will not use such confidential information on behalf of myself or any other individual or company, and will return such information upon termination.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name (Typed or Printed)

**NOTE:** Please Read and Sign the Acknowledgement and Return to the HR Department. You can email [hr@antra.com](mailto:hr@antra.com) for any questions or comments on employee handbook

