

EMPLOYEE TIMEKEEPING POLICY

IMPORTANCE OF ACCURATE TIMEKEEPING

The proper and prompt recording of time in our electronic timekeeping system is extremely important to Creative Circle, ULC (the “Company”). **It is critical to the Company and to you that you report all your time worked accurately, so that the Company can ensure you are properly paid for all your time worked.** The Company also uses time entries for payroll, attendance, benefit computations, and other important business records. The Company may use time entries to bill clients, including government, for work performed. All employees should be aware that certain agencies, including the Defense Contract Audit Agency (“DCAA”), may audit our timekeeping system at any point, with no notice. Any errors discovered during such an audit could compromise our ability to continue providing support services to government customers. Because compliance with the Employee Timekeeping Policy has serious and legal implications, it is critical to the Company.

FALSIFICATION OF TIME RECORDS IS PROHIBITED

It is a serious violation of Company policy for any employee, supervisor, or manager to:

- (1) falsify any timecard, including another employee’s timecard;
- (2) make a false statement or fraudulent representation through improper completion of timecards; or
- (3) instruct another employee to incorrectly or falsely report time worked or alter another employee’s timecard to under- or over-report hours worked.

Company policy strictly prohibits anyone from instructing an employee to work “off-the-clock” and not report time worked. If any supervisor, manager, or employee instructs you to do any of the following, you must report it immediately to the Human Resources Department:

- (1) incorrectly or falsely under- or over-report your time worked;
- (2) alter another employee’s time records to inaccurately or falsely report that employee’s time worked; or
- (3) not report time (including overtime) that you worked.

Falsification of timecards constitutes grounds for severe disciplinary action, up to and including termination of employment for cause.

CERTIFICATION OF TIMECARDS

When filling out time entries, employees must certify that the time entries are accurately reported. **DO NOT SIGN THIS CERTIFICATION IF THE TIME ENTRIES ARE NOT ACCURATE.**

The timekeeping process allows for corrections of errors. Any errors in time reporting must be reported and will be corrected promptly.

Before submitting your time entries, review them carefully to ensure that all time worked is accurately documented. If there is any doubt or uncertainty about how to report your time, you should immediately contact your Creative Circle Company Recruiter or Creative Circle Payroll to obtain information or clarification. “Off-the-clock” work means work you perform but fail to report on your timecard. This would include time during your eating period when you perform work, but that you do not report on your timecard. If a supervisor, manager, or other employee instructs you not to report all your working time or to work “off-the-clock”, then you must immediately report that conduct to Human Resources. This includes if a supervisor, manager, or other employee instructs you to reduce the amount of time you have worked, to not record time you have worked, or to not record overtime you have worked. Employees are prohibited from performing any “off-the-clock” work. “Off-the-clock” work means work you perform but fail to report on your timecard. This would include time during your lunch break when you perform work, but that you do not report.

NON-EXEMPT EMPLOYEES AND OTHER EMPLOYEES WHO MUST RECORD THEIR TIME WORKED

When Non-Exempt Employees Should Work

Employees who are classified as non-exempt or otherwise instructed they must record all their time worked, must accurately record the time they work each day, including start, stop, arrival, departure, and eating period times, and not work any time that is not authorized in advance by their Client supervisor. This means such employees must not start work early, finish work late, work during an eating period, or perform any other extra or overtime work unless directed to do so. To clarify, if you come into work early or leave late for personal reasons, you are prohibited from performing any work during that time, unless it has been authorized in advance by your Client supervisor. If it is not possible to obtain advance permission and you perform work before or after your shift or your authorized work hours, you must record it on your timecard so you will be accurately paid. Overtime work performed by a non-exempt employee, whether approved by the supervisor or not, will be accurately paid. However, violations of this policy may lead to disciplinary action, particularly if the Company determines that the employee could have obtained advance permission before performing work before or after their shift. Employees who have questions about when or how many hours they are expected to work should contact their Client supervisor or Creative Circle Company Recruiter.

As explained above (Certification of Timecards), it is a violation of the Company’s policy for anyone to instruct or encourage another employee to work “off-the-clock,” to incorrectly report hours worked, or to alter another employee’s time records. If any employee is directed or encouraged to incorrectly report hours worked, or to alter

another employee's time records, they need to report the incident immediately to Human Resources.

How to Complete Your Timecard

It is the Company's policy and practice to pay employees for any and all time they work. The Company provides an electronic timekeeping system for employees to report their time worked. If you are classified as a non-exempt employee or otherwise instructed that you must record your time worked each day, you must maintain an accurate record of the actual time you worked daily. Time entries need to be entered accurately to the minute, including time-in and time-out entries and including eating periods. The time entries should be entered at the time particular events occurred, for example when you start work in the morning, and when you start and stop an eating period. Remember, you should not work during your eating period, unless instructed to do so by your Client supervisor. If you are instructed to do so, any work you do perform must be recorded on your timecard to ensure you will be accurately paid. Employees should not wait until the end of a pay period to record time entries.

Time entries for each workweek must be submitted to your Client supervisor by the Monday following the end of the workweek, for their review and approval. Your Client supervisor will then review the time entries for accuracy and completeness and either approve or reject the entry. If a time entry is rejected, the employee will be responsible for correcting the entry promptly and within one working day of being notified of its rejection. If the employee disagrees that the time entry was inaccurate, that disagreement should be discussed with the employee's Client supervisor. If the employee is unable to resolve the disagreement with their Client supervisor, the employee should escalate the issue to the Company Recruiter. If, after escalating to their Company Recruiter the disagreement remains unresolved, the employee should escalate the issue to Human Resources (see Time Reporting Complaints below.)

As explained above (Certification of Timecards), each employee must sign their electronic timecard to verify that the reported time worked is complete and accurate. **BUT DO NOT SIGN THIS CERTIFICATION IF THE TIME ENTRIES ARE NOT ACCURATE.** If there is an issue with accuracy of the timecard that cannot be resolved with the employee's Client supervisor or Company Recruiter, the employee must contact Human Resources. Any employee who fails to report their time worked or inaccurately or incompletely reports their time worked will be subject to disciplinary action, up to and including termination.

TIME REPORTING COMPLAINTS

The Company is committed to paying its employees for any and all time they work, in accordance with applicable law. If any employee is directed or encouraged to incorrectly report hours worked, or to alter another employee's time records, they shall



report the incident immediately to their Company Recruiter, or Company Human Resources. The Company does not tolerate, authorize, or permit “off-the-clock

work”. “Off-the-clock” work means work an employee performs but fails to report on their timecard. This would include, without limitation, time during an employee’s eating period when the employee performs work but does not report the time worked. Off-the-clock work is a violation of the Company’s policies. As explained in the Company’s Timekeeping Policy, it is a violation of Company policy for anyone to instruct or encourage another employee to work “off-the-clock,” to incorrectly report hours worked, or to alter another employee’s time records. This policy contains a complaint form to be used for reporting such Timekeeping Policy violations to Human Resources. This policy protects all Company employees who make a good faith report of Time Reporting Policy violations. Employees who violate the Company’s Time Reporting policy are subject to discipline up to and including the possibility of immediate termination of employment.

Further, if any employee is found to have committed time reporting violations, such employee may be personally liable. Every employee has a responsibility to help protect the Company’s reputation and to prevent unethical or unlawful actions from happening. Any employee who believes they have been instructed to incorrectly report their time worked, must notify their Company Recruiter or Company Human Resources Department as soon as possible. It is the responsibility of each employee to immediately report any violation or suspected violation of the Company’s Timekeeping Policy to one or more of the people identified above. Supervisors, managers, and other upper management must immediately report any incidents of a complaint of Timekeeping Policy violation to the Human Resources Department. Although verbal complaints are accepted, we strongly encourage the use of the attached complaint form. The Company will investigate the matter and take such prompt and immediate action as is warranted under the circumstances. Every complaint will receive a fair, impartial, and timely investigation by qualified personnel that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation will be documented and tracked for reasonable progress and receive timely closure. If misconduct is found, appropriate remedial measures will be taken. While it is not possible to guarantee total confidentiality, the Company will limit disclosure of the matter to the extent practical consistent with its measures to follow up on complaints, including, but not limited to, investigation, remedial action, and any required reporting.

Employees have the right to complain without fear of retaliation. The Company will not take any action against any employee who reports suspected violations in good faith. The Company and the law forbid retaliation against any employee who in good faith complains about time reporting violations to the Company, files a complaint, testifies, assists, or participates in any manner in an investigation, proceeding, or hearing conducted by the Company, or any government agency regarding wage and hour violations. Governments have agencies whose purpose is to address wage and hour violations in the workplace.

Timekeeping Policy Complaint Form

Name: _____ Client name: _____

Client supervisor: _____

Type of Complaint: _____

Date incident reported: _____ Reported to: _____

Please describe the specifics of the Timekeeping Policy violation(s) you believe you have experienced: _____

What is/are the date(s) the incident(s) occurred?

Please describe the incident(s) including what occurred, when it occurred, and whether there were any witnesses other than yourself to the incident(s). If necessary, attach additional sheets of paper.

Please describe what, if anything, you have done in order to attempt to address the situation yourself. If you have not tried to address the situation yourself, please explain why.

Are you aware of any other person who has been subjected to similar incident(s) or retaliation? If so, please identify such person(s) and describe the details, including when and what occurred.

Other than the individual(s) you have identified above, is/are there any other person(s) who you feel should be contacted in connection with the investigation of this complaint.



If so, please identify the individuals, how to contact them, and what information these individual(s) may have.

If, at any time, you feel that, as a result of a complaint, or your participation in the investigation of a complaint, you are being retaliated against, please file an additional complaint using this form. If necessary, attach additional sheets of paper.

Your Timekeeping Policy or related retaliation complaint will be promptly and thoroughly investigated. The Company will try to limit disclosure of the matter(s) to the extent practical consistent with its measures to follow up on complaints, including, but not limited to, investigating, remedial action, and any required reporting. If the investigation verifies that the Company's Timekeeping Policy has been violated or related retaliation has occurred, appropriate disciplinary action will be taken against the person who has engaged in such conduct.

If you have not received any response to your Complaint in two business days, contact the phone number below.

Please read the above carefully before signing. Your signature below will indicate that this form accurately and completely describes your Timekeeping Policy or retaliation complaint.

Employee Signature:	Date:
Please print name:	

PLEASE REPORT THIS INCIDENT IMMEDIATELY TO HUMAN RESOURCES:

Phone Number: 323-930-2333 **Email:** HumanResources@creativecircle.com