Creative Circle Handbook
State Supplements

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ARIZONA SUPPLEMENT

About This Arizona Supplement

Creative Circle (the "Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Arizona employees will receive the Company's national handbook ("Handbook") and the Arizona Supplement to the Handbook ("Arizona Supplement") (together, the "Employee Handbook").

The Arizona Supplement applies only to Arizona employees. It is intended as a resource containing specific provisions derived under Tennessee law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Arizona Supplement are different from, or more generous than those in the Handbook, the policies in the Arizona Supplement will apply.

The Tennessee Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Arizona Earned Paid Sick Time

Eligibility. The Company provides earned paid sick time to employees who work in Arizona. For employees who work in Arizona who are eligible for sick time under a general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing earned paid sick time pursuant to this policy at the start of employment. Employees accrue one (1) hour for every thirty (30) hours worked, up to a maximum accrual of forty (40) hours each calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case earned paid sick time accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st

Usage. Employees may use earned paid sick time on the 90th calendar day of employment. An employee may not use more than forty (40) hours of earned paid sick time in any calendar year.

Employees may use earned paid sick time for absences due to:

1) An employee's mental or physical illness, injury or health condition; an employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury or health condition; care of a family member who needs medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; care of a family member who needs preventive medical care;
3) Closure of the employee's place of business by order of a public official due to a public health emergency or an employee's need to care for a child whose school or place of care has been closed by order of a public official due to a public health emergency, or care for oneself or a family member when it has been determined by the health authorities having jurisdiction or by a health care provider that the employee's or family member's presence in the community may jeopardize the health of others because of their exposure to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease; or
4) A covered purpose relating to domestic violence, sexual violence, abuse or stalking, to allow the employee to obtain (for himself/herself or for a family member), such as medical attention; services from a victims' organization; counseling; relocation; and legal services.

For purposes of this policy, family member includes (regardless of age): a biological, adopted or foster child, stepchild or legal ward, a child of a domestic partner, a child to whom the employee stands in loco parentis, or an individual to whom the employee stood in loco parentis when the individual was a minor; a biological, foster, stepparent or adoptive parent or legal guardian of an employee or an employee's spouse or domestic partner or a person who stood in loco parentis when the employee or employee's spouse or domestic partner was a minor child; spouse or domestic partner; a grandparent, grandchild or sibling (whether of a biological, foster, adoptive or step relationship) of the employee or the employee's spouse or domestic partner; or any other individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.

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

Notice & Documentation. Employees are required to make a reasonable effort to schedule the use of earned paid sick time in a manner that does not unduly disrupt the Company's operations. Requests to use earned paid sick time may be made orally, in writing, or electronically (e.g., via email), and whenever possible, the request must include the expected duration of the employee's absence. When the use of earned paid sick time is foreseeable, the employee is required to make a good faith effort to provide notice of the need for such time to their supervisor in advance of the use of the earned paid sick time. When the use of earned sick time is not foreseeable, the employee is required to provide notice to their supervisor at least one (1) hour prior to the start of the employee's workday or as soon as possible under the circumstances.

For earned paid sick time of three (3) or more consecutive workdays, the Company requires reasonable documentation that the earned paid sick time has been used for a covered purpose. For reason #1 and #2 above, documentation signed by a heath care professional indicating that earned paid sick time is necessary is reasonable. For reason #4 above, any of the following types of documentation selected by the employee are reasonable:

1) A police report indicating that the employee or the employee's family member Was a victim of domestic violence, sexual violence, abuse or stalking;
2) A protective order; injunction against harassment; a general court order; or other evidence from a court or prosecuting attorney that the employee or employee's family member appeared, or is scheduled to appear, in court in connection with an incident of domestic violence, sexual violence, abuse, or stalking;
3) A signed statement from a domestic violence or sexual violence program or victim services organization affirming that the employee or employee's family member is receiving services related to domestic violence, sexual violence, abuse, or stalking;
4) A signed statement from a witness advocate affirming that the employee or employee's family member is receiving services from a victim services organization;
5) A signed statement from an attorney, member of the clergy, or a medical or other professional affirming that the employee or employee's family member is a victim of domestic violence, sexual violence, abuse, or stalking; or
6) An employee's written statement affirming that the employee or the employee's family member is a victim of domestic violence, sexual violence, abuse, or stalking, and that the leave was taken for one of the purposes described above.

Documentation provided to the Company should not explain the nature of the employee's or a family member's health condition or the details of the domestic violence, sexual violence, abuse or stalking.

Payment. Earned paid sick time will be paid at the same hourly rate the employee earns from the employee's employment at the time the employee uses such time, but no less than the applicable minimum wage, unless otherwise required by applicable law. Use of earned paid sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused earned paid sick time to the following calendar year. Unused earned paid sick time will not be paid at separation.

Enforcement & Retaliation. Retaliation against an employee who requests or uses earned paid sick time is prohibited. An employee has the right to file a complaint if earned paid sick time as required by law is denied by an employer or if the employee is subjected to retaliation for requesting or taking earned paid sick time. The Arizona Industrial Commission's contact information is as follows: 800 W. Washington Street, Phoenix, AZ 85007 / 602-542-4515 / www.azica.gov.

CALIFORNIA SUPPLEMENT

About This California Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, California employees will receive the Company's national handbook ("Handbook") and the California Supplement to the Handbook ("California Supplement") (together, the "Employee Handbook").

The California Supplement applies only to California employees. It is intended as a resource containing specific provisions derived under California law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the California are different from or more generous than those in the National Handbook, the policies in the California Supplement will apply.

The California Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Discrimination, Harassment, and Retaliation Prevention Policy (addendum to the general policy in the Handbook)

In addition to those protected characteristics covered by the general policy, protected characteristics also include reproductive health decision making.

Breaks and Meal Periods

Rest Breaks. Non-exempt employees (including hourly commissioned employees) who work at least three and one half (3½) hours per workday are authorized and permitted to take one (1) 10-minute rest break for every four hours or major fraction thereof worked. For purposes of this policy, "major fraction" means any time greater than two (2) hours. For example, if a non-exempt employee works more than six (6) hours, but no more than ten (10) hours in a workday, the employee is authorized and permitted to take two (2) 10-minute rest breaks: one during the first half of the shift and a second rest break during the second half of the shift. If a non-exempt employee works more than ten (10) hours but no more than fourteen (14) hours in a day, the employee is authorized and permitted to take three (3) 10-minute rest breaks, and so on.

Rest breaks should be taken as close to the middle of each work period of four hours or major fraction thereof as is practical. Non-exempt employees do not need to obtain approval from or notify their supervisor when taking a rest break. Non-exempt employees are encouraged to take their rest breaks; they are not expected to and should not work during their rest breaks. Non-exempt employees are paid for all rest break periods and do not need to clock out when taking a rest break.

Rest breaks may not be combined with each other or with the meal period. In addition, rest breaks may not be taken at the beginning or end of the work day to arrive late or leave early. Each rest break must be a separate break, meeting the requirements described above. If any work is performed during a rest break, or if the rest break is interrupted for any work-related reason, the employee is entitled to another uninterrupted paid rest break.

The Company also provides cool down rest and recovery periods as needed to prevent heat illness for employees that are required to perform work outdoors, as required under applicable state law.

Meal Periods. Employees who work more than five (5) hours in a workday are provided an unpaid, off-duty and uninterrupted meal period of at least thirty (30) minutes. Employees are responsible for scheduling their own meal period, but should confirm them with their supervisor(s). Meal periods must begin no later than before the end of the fifth hour of work. For example, employees who start working at 8 a.m. must begin their meal period no later than 12:59 p.m.

Employees who work more than ten (10) hours in a day are entitled to a second unpaid, off-duty and uninterrupted 30-minute meal period. Employees entitled to a second meal period should schedule their second meal period so it begins no later than before the end of their tenth hour of work, meaning the meal period should begin after working no more than 9 hours, 59 minutes.

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

Those employees who use a time clock must clock out for their meal periods. Employees are required to clock back in and promptly return to work at the end of any meal period. Employees who record their time manually must accurately record their meal periods by recording the beginning and end of each work period. Unless otherwise directed by their supervisor in writing, employees are not required to get approval from or notify their supervisor when taking a meal period. Employees are to immediately notify Human Resources and their supervisor if they believe that they are prevented by the nature of their work from taking a timely and/or complete meal period.

Meal Period Waiver. If no more than six (6) hours of work will complete the day's work, employees may voluntarily waive their meal period in writing by returning the waiver form below to Human Resources. If an employee works no more than twelve (12) hours, the employee can voluntarily waive the second meal period, but only if the first meal period was received and not waived in any manner. Any waiver of the second meal period must be in writing and submitted before the second meal period, by returning the waiver form below to Human Resources. Employees who work more than twelve (12) hours may not waive, and should take, their second unpaid, off-duty and uninterrupted 30-minute meal period.

No Working During Rest Breaks and Meal Periods. Employees are completely relieved of all work duties and responsibilities during their rest breaks and meal periods. All rest breaks and meal periods must be taken outside employees' work areas. Employees may leave the premises during rest breaks and meal periods. Employees should not visit or socialize with employees who are working while taking their rest break or meal period. Employees are not expected to remain "on call" or available to respond to messages, monitor radios, telephones, email or other devices during meal periods and rest breaks -- even those who are in a sensitive position like security or information technology. Employees are required to notify Human Resources immediately if they believe they are being pressured or coerced by any manager, supervisor, or other employee to forego any portion of a provided rest break or meal period.

Employees should use the sample Meal Period & Rest Break Premium Request Form at the end of this Policy to report missed rest breaks and meal periods.

Summary Chart. Below is a chart that generally summarizes the number of rest breaks and meal periods provided to employees who work up to 14 hours under this policy. If an employee works more than 14 hours, the employee will be provided rest breaks and meal periods consistent with this policy and applicable law:

Hours of Work	Rest Breaks and/or Meal Periods
0 to 3 hours, 29 minutes	No paid rest break and no meal period
3 hours, 30 minutes up to 5.0 hours	One 10-minute paid rest break
More than 5.0 hours up to 6.0	One 10-minute paid rest break and one 30 minute unpaid meal period (unless first meal period is mutually waived pursuant to this policy)
More than 6.0 hours up to 10.0 hours	Two 10-minute paid rest breaks and one 30 minute unpaid meal period
More than 10.0 hours up to 12.0 hours	Three 10-minute paid rest breaks and two 30 minute unpaid meal periods (unless second meal period is mutually waived pursuant to this policy)
More than 12.0 hours up to 14.0 hours	Three 10-minute paid rest breaks and two 30 minute unpaid meal periods

Overtime

When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime. ***All overtime must be approved in advance by the employee's supervisor.*** Working overtime without prior authorization may result in disciplinary action up to and including termination of employment.

All nonexempt employees in California will be paid a premium for overtime hours as follows:

- One and one-half times their regular rate of pay for all hours worked in excess of 8 per workday, up to 12, or in excess of 40 in a workweek;

- One and one-half times their regular rate of pay for the first 8 hours on the seventh consecutive day of work in a workweek; and

- Double the regular rate of pay for all hours worked in excess of 12 in a workday and after 8 hours on the seventh consecutive day of work in a workweek.

Overtime pay is based on actual hours worked. PTO, vacations, holidays, sick days or any leave of absence will not be considered hours worked for purposes of performing overtime calculations.

Lactation Accommodation Policy

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

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

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

An employee who believes they need a lactation accommodation should submit a request for possible accommodation by contacting Human Resources via phone, e-mail, or other direct communication. Upon receiving an accommodation request, the Company will

respond to the employee within 5 business days. The Company and the employee shall engage in an interactive process to determine the appropriate accommodations.

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

Employees have the right to file a complaint with the Labor Commissioner for any violation of the rights underlying this policy.

Employees can contact Human Resources with questions regarding this policy.

California Family Rights Act (Addendum to FMLA Policy)

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

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

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

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

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

Basic Family and Medical Leave Entitlement. FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. CFRA leave may be up to twelve (12) workweeks in a 12-month period, and can be used for the birth, adoption, or foster care placement of a child; the employee's own serious health condition (except leave for an employee's disability due to pregnancy, childbirth or related medical condition does not count against CFRA leave); to care for a child, parent, grandparent, grandchild, sibling, spouse, or domestic partner or designated person with a serious health condition (except leave to care for an employee's parent-in-law, grandparent, grandchild, sibling, or registered domestic partner or designated person does not count against FMLA leave); or a "qualifying exigency" related to the covered active duty or call to covered active duty of an employee's spouse, registered domestic partner, child or parent in the Armed Forces of the United States. Employees who are CFRA-eligible have certain rights to take **both** a pregnancy disability leave ("PDL") and a CFRA leave for reason of the birth of a child.

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

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

Leave to Care for a Servicemember. Leave to care for a military service member with a serious illness or injury counts against an employee's CFRA leave entitlement when the servicemember is the employee's spouse, parent, child, grandparent, grandchild or sibling as provided for under CFRA.

Bonding Leave. Employees may take intermittent leave for bonding with a child following birth or placement for adoption or foster care. Birth bonding leave must be taken within one (1) year after the child's birth or placement. Intermittent leave for bonding purposes generally must be taken in 2-week increments, but the Company permits two occasions

where the leave may be for less than two (2) weeks. Bonding leave is in addition to any time off taken for pregnancy disability leave.

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

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

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

Job Benefits. Taking CFRA leave or PDL may impact certain benefits and seniority date. More information regarding eligibility for a leave and/or the impact of the leave on seniority and benefits can be obtained by contacting the Human Resources Department.

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

Pregnancy and Pregnancy-Related Disabilities Leave and Accommodation

Employees who are disabled by pregnancy, childbirth or related medical conditions are eligible to take a pregnancy disability leave ("PDL"). If affected by pregnancy or a related medical condition, employees also are eligible to transfer to a less strenuous or hazardous position or to less strenuous or hazardous duties, if such a transfer is medically advisable and can be reasonably accommodated. Employees disabled by qualifying

conditions may also be entitled to other reasonable accommodations where doing so is medically necessary. In addition, if it is medically advisable to take intermittent leave or work a reduced leave schedule, the Company may require a temporary transfer to an alternative position with equivalent pay and benefits that can better accommodate recurring periods of leave.

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

Duration of Leave. An employee is entitled to up to four (4) months of PDL, per pregnancy, while disabled by pregnancy, childbirth or a related medical condition. PDL does not need to be taken in one continuous period of time, but can be taken on an intermittent basis pursuant to the law. For purposes of this policy, "four months" means time off for the number of days the employee would normally work within the four calendar months (one-third of a year, or 17.3 weeks or 122 days) following the commencement date of taking a pregnancy disability leave. If an employee's schedule varies from month to month, a monthly average of the hours worked over the four months prior to the beginning of the leave shall be used for calculating the employee's normal work month.

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

Medical Certification. Employees may be required to obtain a certification from their health care provider regarding their need for PDL or the medical advisability of an accommodation or a transfer, to the extent permitted by applicable law. Where required, the certification in support of a request for a reasonable accommodation should include:

1) a description of the requested reasonable accommodation or transfer;
2) a statement describing the medical advisability of the reasonable accommodation or transfer because of pregnancy; and
3) the date on which the need for reasonable accommodation or transfer became or will become medically advisable and the estimated duration of the reasonable accommodation or transfer.

Where required, a medical certification indicating disability necessitating a leave is sufficient if it contains:

1) a statement that the employee needs to take pregnancy disability leave because the employee is disabled by pregnancy, childbirth or a related medical condition;
2) the date on which the employee became disabled because of pregnancy; and
3) the estimated duration of the leave.

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

Leave is Unpaid. PDL is unpaid by the Company. However, at an employee's option, an employee may use any accrued paid time off as part of PDL before taking the remainder of leave on an unpaid basis. The use of any paid leave will not extend the duration of PDL. We encourage employees to contact the EDD regarding eligibility for state disability insurance for the unpaid portion of leave.

Leave Concurrent with Family and Medical Leave. For employees who are eligible for leave under the federal Family and Medical Leave Act, PDL will also be designated as time off under the Family and Medical Leave Act, but not the California Family Rights Act. Please refer to the "Family and Medical Leave" policy in this Handbook for additional information.

Continuation of Health Insurance Benefits. Employees who participate in the Company's group health insurance plan will continue to participate in the plan while on PDL under the same terms and conditions as if they were working. In some instances, the Company may recover premiums it paid to maintain health insurance benefits if an employee fails to return to work following the employee's pregnancy disability leave for reasons other than taking additional leave afforded by law or Company policy or not returning due to circumstances beyond the employee's control.

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

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

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

Leave For Domestic Violence, Sexual Assault, or Stalking

Employees who are victims of a crime or abuse, including domestic violence, sexual assault, or stalking, may take up to twelve (12) weeks of unpaid leave in any 12-month period for the following reasons:

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

Employees are covered as victims and entitled to leave under this policy if they are:

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

The Company may require proof of an employee's participation in these activities. Whenever possible, employees must provide Human Resources reasonable notice before taking any time off under this policy.

Leave under this policy is unpaid, but employees may substitute any accrued paid time off benefits for the unpaid leave provided under this policy. Leave under this policy does not extend the time allowable under the "Family and Medical Leave Act" Policy.

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

Paid Family Leave Benefits

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

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

Employees who need to take time off work for any of the reasons set forth above may contact the Human Resources Department for information about the EDD's PFL program and how to apply for benefits. Employees also may contact their local EDD office for further information. Employees should maintain regular contact with the Human Resources Department while absent from work so we may monitor employees' return-to-work status. In addition, employees should contact the Human Resources Department when ready to return to work so we may determine what positions, if any, are open.

When an employee applies for PFL benefits, the Human Resources Department will determine if the employee has any accrued but unused paid time off, other than sick time, available. If the employee has accrued but unused paid time off, other than sick time, available, then the employee will be required to use up to two (2) weeks of such time before becoming eligible for PFL benefits.

Employees taking time off work for any of the reasons set forth above are not guaranteed job reinstatement unless they qualify for such reinstatement under federal or California family and medical leave laws. Any time off for Paid Family Leave purposes will run concurrently with other leaves of absence, such as Family and Medical Leave/California Family Rights Act Leave, if applicable. Please see the "Family and Medical Leave/California Family Rights Act" policies for eligibility requirements.

San Francisco Paid Parental Leave Benefits

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

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

- Be absent from work due to an approved leave of absence for the purpose of bonding with a new child during the first year after birth of the child or placement of the child with the employee through foster care or adoption;
- Have worked at least 180 calendar days for the Company before beginning any parental leave;
- Perform at least eight (8) hours of work per week for the Company within the geographic boundaries of the City and County of San Francisco;
- Perform at least 40% of their total weekly hours within the geographic boundaries of the City and County of San Francisco;
- Be receiving wage replacement benefits from the State of California's Paid Family Leave ("PFL") program for the purpose of bonding with a new child;

- Agree to allow the Company to deduct up to two weeks (80 hours) of accrued vacation or PTO benefits in accordance with the Ordinance from the employee's leave bank to offset the cost of any Supplemental Compensation benefits as allowed under the ordinance; and
- Comply with the procedures for requesting Supplemental Compensation benefits described below.

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

Supplemental Compensation Benefit. The weekly Supplemental Compensation benefit is calculated based on an employee's wages and will be calculated in accordance with the San Francisco Paid Parental Leave Ordinance. Unless otherwise provided by law, an employee's weekly Supplement Compensation benefit will be equal to the difference between the weekly benefit received by the employee from the State of California PFL program and the weekly wage associated with that PFL benefit amount. There is a maximum PFL benefit and corresponding cap on Supplemental Compensation. Supplemental Compensation is only available during the period the employee is eligible for and is receiving weekly PFL benefits for the purpose of bonding with a new child. Employees can receive up to eight (8) weeks of Supplemental Compensation benefits.

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

- Send an email to Human Resources stating that the employee understands and agrees that up to two (2) weeks (80 hours) of vacation or PTO in accordance with the Ordinance will be deducted from the employee's leave bank to offset the Company's costs in providing Supplemental Compensation, to the extent allowed by law.
- Provide the Company with a copy of the employee's Notice of Computation of California Paid Family Leave Benefits ("Notice") from California's Employment Development Department (EDD). To expedite receipt of Supplemental Compensation, it is recommended that employees also provide EDD with permission to share the employee's California PFL weekly benefit amount with the Company;
- Complete and sign the San Francisco Paid Parental Leave Employee Form ("PPL Form"). The Notice and PPL Form must be submitted within a reasonable time following the Covered Employee's receipt of the Notice from EDD;
- Notify the Company in writing when the employee receives the first payment from EDD; and
- Submit a copy of the Notice of Payment from EDD to confirm the Covered Employee's receipt of PFL benefits.

Employees who do not fully comply with this procedure may be denied Supplemental Compensation benefits, or receipt of these benefits may be delayed. If an employee completes the above procedures for receiving Supplemental Compensation during the period in which the employee is also receiving PFL benefits, the Company will make a

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

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

Questions regarding this policy may be directed to Human Resources – Benefits Team.

San Francisco Military Leave Pay Protection Benefits

In accordance with San Francisco's Military Leave Pay Protection Act, the Company provides supplemental compensation to eligible employees who are on an approved military leave of absence.

Eligible Employees. To be eligible to receive supplemental compensation under this policy an employee must:

- Work within the geographic boundaries of San Francisco;
- Be a member of the reserve corps of the United States Armed Forces, National Guard, or other uniformed service organization of the United States; and
- Be on an approved leave for military duty.

Amount of Supplemental Compensation. An eligible employee shall receive supplemental compensation in an amount equal to the difference between the employee's gross military pay and the amount of gross pay the employee would have received from the Company had the employee worked their regular work schedule in San Francisco. Overtime hours (unless regularly scheduled) and hours scheduled to work outside of San Francisco do not count toward the employee's gross pay calculation. Supplemental compensation is paid in daily increments. Eligible employees may receive up to 30 days of supplemental compensation in a calendar year.

For employees who do not work a regular work schedule, supplemental compensation shall be determined by looking at the six bi-weekly or semi-monthly pay periods, or 12 weekly pay periods, as applicable, immediately preceding the employee's leave, not including any pay periods during which the employee was on unpaid or partially paid leave. The Company will endeavor to provide the employee with the supplemental compensation no later than the payday for the payroll period when the employee's military leave began.

Benefits. Eligible employees will continue to receive all benefits as if they had worked their regular schedule during any period of time during which they receive supplemental compensation.

Documentation. Employees may be requested to provide their written military orders or a wage statement verifying the military gross pay the employee received or will receive to ensure accurate payment of supplemental compensation.

Repayment by Employee. An employee receiving supplemental compensation under this policy who can return to their position after completion of military leave but fails to return within 60 days of release from duty shall be required to repay any supplemental compensation received.

Coordination with Other Policies. Any supplemental compensation paid under this policy will be coordinated with and offset by amounts required to be paid under any other law or policy so that an employee on military leave does not receive more in total pay then the employee would have received if they had worked their regular work schedule.

Employees with questions about this policy can contact Human Resources.

Reproductive Loss Leave

Employees who have been employed for at least 30 days will be provided with up to five (5) days of reproductive loss leave following a reproductive loss event. Employees who experience more than one reproductive loss event within a 12-month period are limited to twenty (20) days of reproductive loss leave in a 12-month period. For purposes of this policy, a reproductive loss event means the day or, for a multiple-day event, the final day of a failed adoption, failed surrogacy, miscarriage, stillbirth, or an unsuccessful assisted reproduction via artificial insemination or an embryo transfer.

Leave may only be taken on regularly scheduled workdays. Leave does not need to be taken on consecutive days. Leave must be completed within three (3) months of the reproductive loss event, except that if an employee is on some other leave from work prior to or immediately following a reproductive loss event, the reproductive loss leave is available for use during the three (3) months following the end date of the other leave.

Reproductive loss leave is unpaid, except to the extent the employee is eligible for paid leave for these purposes under other Company policies. An employee may elect to use accrued [vacation, personal days or sick leave] to receive pay during any unpaid leave taken under this policy. Leave provided pursuant to this policy will run concurrently with any other applicable leave of absence for covered reasons, to the maximum extent permitted by applicable law. The substitution of paid time for unpaid leave time does not extend the length of leave and the paid time will run concurrently with an employee's reproductive loss leave entitlement.

Employees must inform their supervisor prior to commencing reproductive loss leave.

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

California Paid Sick Leave

Eligibility. Pursuant to the Healthy Workplaces, Healthy Families Act, the Company provides paid sick leave to employees who work for the Company in California for thirty (30) or more days within a year. For employees who work in California who are eligible for sick leave under the general paid time off and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick leave at the start of employment. Paid sick leave will accrue at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of six (6) days or forty-eight (48) hours (ten (10) days or eighty (80) hours effective January 1, 2024). Employees who are exempt from overtime pursuant to the executive, administrative, and professional exemptions under California law are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid sick leave accrues based upon that normal workweek. For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

Usage. Employees can use accrued paid sick leave beginning on the 90th day of employment. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system. Beginning January 1, 2024, Employees may use up to five (5) days or forty (40) hours of paid sick leave in any year.

Paid sick leave may be used for the following reasons:

1) For diagnosis, care, or treatment of an existing health condition of, or preventive care for, an employee or an employee's family member; or
2) For an employee who is a victim of domestic violence, sexual assault, or stalking:
    a) To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
    b) To help ensure the health, safety, or welfare of the victim or the victim's child;
    c) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
    d) To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
    e) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
    f) To participate in safety planning and take other actions to increase safety from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation.

For purposes of this policy, “family member” means a child (including biological, adopted, or foster child, stepchild, legal ward, or a child to whom the employee stands in loco parentis, all regardless of age or dependency status); spouse; registered domestic partner; parent (including biological, adoptive, or foster parent, stepparent, or legal guardian of an employee or the employee’s spouse or registered domestic partner, or a person who stood in loco parentis when the employee was a minor child); grandparent; grandchild; sibling; or designated person (a person identified by the employee at the time the employee requests paid sick leave*)*. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice. Notice to your supervisor may be given orally or in writing. If the need for paid sick leave is foreseeable, the employee must provide reasonable advance notification. If the need for paid sick leave is unforeseeable, the employee must provide notice of the need for the leave as soon as practicable.

Payment. Eligible employees will receive payment for paid sick leave, at the same wage as the employee normally earns during regular work hours, unless otherwise required by applicable law, by next regular payroll period after the leave was taken. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued paid sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of six (6) days or forty-eight (48) hours (ten (10) days or eighty (80) hours effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests paid sick leave or uses paid sick leave, or both, is prohibited, and employees may file a complaint with the Labor Commissioner against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources - Benefits team.

Berkeley Paid Sick Leave (For Employees Also Covered Under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides paid sick leave to employees who perform at least two (2) hours of work in the City of Berkeley. For employees who work in Berkeley who are eligible for sick leave under a general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off or sick leave policy.

Accrual. Employees begin accruing paid sick leave at the start of employment. Paid sick leave accrues at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Employees who are exempt from overtime pursuant to the California executive, administrative, and professional exemptions are assumed to work a 40-hour workweek unless their normal workweek is less than 40 hours, in which case, paid sick leave accrues based upon that regular workweek.

Usage. Employees can use accrued paid sick leave on the 90th day of employment. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system.

Paid sick leave may be used for the following reasons:

1) When an employee is physically or mentally unable to perform the employee's duties due to illness, injury, pregnancy or a related medical condition;
2) To obtain a professional diagnosis or treatment of the employee's medical condition or undergo a physical examination;
3) To aid or care for a family member or designated person who is ill, injured, or receiving medical care, treatment, or diagnosis; or
4) Any other reason required by applicable law.

For purposes of this policy, "family member" means child (including a child of a domestic partner and a child of a person standing in loco parentis); parent; legal guardian or ward; sibling; grandparent; grandchild; spouse or registered domestic partner under any state or local law; designated person (*a person identified by the employee at the time the employee requests paid sick leave)*; and any other individual deemed a family member under applicable law. These relationships include not only biological relationships but also relationships resulting from adoption, step-relationships, and foster care relationships. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice & Documentation. Employees are required to provide reasonable notification of an absence taken under this policy. In the case of foreseeable absences, the Company requests reasonable advance notification, and what is reasonable will generally depend on the specific situation. In the case of unforeseeable absences, the employee must provide notice of the need for the leave as soon as practicable. To the maximum extent permitted by applicable law, the Company may request medical documentation for the use of paid sick leave of more than three (3) consecutive work days or twenty-four (24) consecutively scheduled work hours, whichever is greater. The Company may also take reasonable measures to verify that employees' use of paid sick leave is lawful, to the maximum extent permitted by applicable law.

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

Carryover & Payout. Accrued paid sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests paid sick leave or uses paid sick leave, or both, is prohibited, and employees may file a complaint with the California Labor Commissioner or the City of Berkeley against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Emeryville Paid Sick Leave (For Non-Exempt Employees Also Covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides paid sick leave to non-exempt employees who perform at least two (2) hours of work in the City of Emeryville. For employees who work in Emeryville who are eligible for sick leave under a general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance,

Accrual. Employees begin accruing paid sick leave at the start of employment. Paid sick leave accrue at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

Usage. Employees can use accrued paid sick leave beginning on the 90th day of employment. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system. An employee may use up to seventy-two (72) hours of paid sick leave in any year.

Paid sick leave may be used for the following reasons:

1) For diagnosis, care, or treatment of an existing health condition of, or preventive care for, an employee or an employee's family member;
2) For an employee who is a victim of domestic violence, sexual assault, or stalking:
    a) To obtain or attempt to obtain a temporary restraining order, restraining

order, or other injunctive relief;
   b) To help ensure the health, safety, or welfare of the victim or the victim's child;
   c) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
   d) To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
   e) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
   f) To participate in safety planning and take other actions to increase safety from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation;
3) To aid or care for a guide dog, signal dog, or service dog (as those terms are defined under applicable state law) of an employee or an employee's family member; or
4) Any other reason required by applicable law.

For purposes of this policy, "family member" means a child (including biological, adopted, or foster child, stepchild, legal ward, or a child to whom the employee stands in loco parentis, all regardless of age or dependency status); spouse; registered domestic partner; parent (including biological, adoptive, or foster parent, stepparent, or legal guardian of an employee or the employee's spouse or registered domestic partner, or a person who stood in loco parentis when the employee was a minor child); grandparent; grandchild; sibling; designated person (*a person identified by the employee at the time the employee requests paid sick leave)*; and any other individual deemed a family member under applicable law. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice. Notice to the employee's supervisor may be given orally or in writing. If the need for paid sick leave is foreseeable, the employee must provide reasonable advance notification. If the need for paid sick leave is unforeseeable, the employee must provide notice of the need for the leave as soon as practicable.

Payment. Eligible employees will receive payment for paid sick leave, at the same wage as the employee normally earns during regular work hours, unless otherwise required by applicable law, by next regular payroll period after the leave was taken. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued paid sick leave carries over from year to year but is subject to the maximum accrual (accrual cap) of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop

accruing until some paid sick leave is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests paid sick leave or uses paid sick leave, or both, is prohibited, and employees may file a complaint with the Labor Commissioner against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Los Angeles Paid Sick Leave (For Non-Exempt Employees also covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides paid sick leave to eligible non-exempt employees who work in the City of Los Angeles for the Company for 30 days or more within a year from the commencement of employment and who, in a particular week, perform at least two (2) hours of work per week for the Company in the City of Los Angeles. For employees who work in the City of Los Angeles who are eligible for paid sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Eligible employees begin accruing paid sick leave at the start of employment. Paid sick leave accrues at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

Usage. Employees can use accrued paid sick leave on the 90th day of employment. may be used in the smallest increment of time tracked by the Company's payroll system. Employees cannot use more than forty-eight (48) hours of paid sick leave per year.

Paid sick leave may be used for the following reasons:

1) For diagnosis, care, or treatment of an existing health condition of, or preventive care for, an employee or an employee's family member; or
2) For an employee who is a victim of domestic violence, sexual assault, or stalking:
    a) To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
    b) To help ensure the health, safety, or welfare of the victim or the victim's child;
    c) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
    d) To obtain services from a domestic violence shelter, program, or rape crisis

center as a result of domestic violence, sexual assault, or stalking;

e) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
f) To participate in safety planning and take other actions to increase safety from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation.

3) Any other reason required by applicable law.

For purposes of this policy, "family member" means a child (including biological, adopted, or foster child, stepchild, legal ward, or a child to whom the employee stands in loco parentis, all regardless of age or dependency status); spouse; registered domestic partner; parent (including biological, adoptive, or foster parent, stepparent, or legal guardian of an employee or the employee's spouse or registered domestic partner, or a person who stood in loco parentis when the employee was a minor child); grandparent; grandchild; sibling; designated person (*a person identified by the employee at the time the employee requests paid sick leave)*; or any individual related by blood or affinity whose close association with the employee is equivalent of a family relationship. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice & Documentation. Notice to the employee's supervisor may be given orally or in writing. If the need for paid sick leave is foreseeable, the employee must provide reasonable advance notification. If the need for paid sick leave is unforeseeable, the employee must provide notice of the need for the leave as soon as practicable. To the maximum extent permitted by applicable law, the Company may require an employee to provide reasonable documentation of an absence from work of more than three (3) consecutive days for which paid sick leave is or will be used.

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

Carryover & Payout. Accrued, unused paid sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued, unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests paid sick leave or uses paid sick leave, or both, is prohibited, and employees may file a complaint with the California Labor Commissioner or the appropriate City

designated administrative agency against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Oakland Paid Sick Leave (For Employees also covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides paid sick leave to employees who perform at least two (2) hours of work in the City of Oakland. For employees who work in Oakland who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick leave at the start of employment. Paid sick leave accrues at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Employees who are exempt from overtime pursuant to the California executive, administrative, and professional exemptions are assumed to work a 40-hour workweek unless their normal workweek is less than 40 hours, in which case, paid sick leave accrues based upon that regular workweek.

Usage. Employees can use accrued paid sick leave on the 90th day of employment. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system.

Paid sick leave may be used for the following reasons:

1) When an employee is physically or mentally unable to perform the employee's duties due to illness, injury, pregnancy or a related medical condition;
2) To obtain a professional diagnosis or treatment of the employee's medical condition or undergo a physical examination;
3) To aid or care for a family member or designated person who is ill, injured, or receiving medical care, treatment, or diagnosis;
4) For an employee who is a victim of domestic violence, sexual assault, or stalking:
    a) To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
    b) To help ensure the health, safety, or welfare of the victim or the victim's child;
    c) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
    d) To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
    e) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
    f) To participate in safety planning and take other actions to increase safety

from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation;

5) Any other reason required by applicable law.

For purposes of this policy, "family member" means child (including a child of a domestic partner and a child of a person standing in loco parentis); parent; legal guardian or ward; sibling; grandparent; grandchild; spouse or registered domestic partner under any state or local law; designated person (*a person identified by the employee at the time the employee requests paid sick leave)*; and any other individual deemed a family member under applicable law. These relationships include not only biological relationships but also relationships resulting from adoption, step-relationships, and foster care relationships. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice & Documentation. Employees are required to provide reasonable notification of an absence taken under this policy, such as by contacting their supervisor by phone or email. In the case of foreseeable absences, the Company requests reasonable advance notification, and what is reasonable will generally depend on the specific situation. In the case of unforeseeable absences, the Company generally requests advanced notification of at least two (2) hours prior to the start of an employee's shift or, if such notice is not possible, as soon as practicable. To the maximum extent permitted by applicable law, the Company may request medical documentation for the use of paid sick leave of more than three (3) consecutive workdays or twenty-four (24) consecutively scheduled work hours, whichever is greater. The Company may also take reasonable measures to verify that employees' use of paid sick leave is lawful, to the maximum extent permitted by applicable law.

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

Carryover & Payout. Accrued paid sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests paid sick leave or uses paid sick leave, or both, is prohibited, and employees

may file a complaint with the California Labor Commissioner or the City of Oakland against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources or the Benefits Team.

San Diego Earned Sick Leave (For NON-EXEMPT Employees also covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides earned sick leave to eligible non-exempt employees who, in one or more calendar weeks of the year, perform at least two (2) hours of work for the Company in the City of San Diego. For employees who work in San Diego who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing earned sick leave at the start of employment. Earned sick leave accrues at the rate of one (1) hour for every thirty (30) hours worked, subject to a maximum accrual of eighty (80) hours. For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

Usage. Employees can use accrued earned sick leave on the 90th calendar day of employment. Earned sick leave may be used in the smallest increment of time tracked by the Company's payroll system. Employees cannot use more than forty (40) hours of earned sick leave in any year.

Earned sick leave may be used for the following reasons:

1) When an employee is physically or mentally unable to perform the employee's duties due to illness, injury, pregnancy, or another medical condition;
2) To obtain a physical examination or a professional diagnosis or treatment of the employee's medical condition;
3) To aid, assist, or care for a family member with an illness, injury, or medical condition, including assistance in obtaining professional diagnosis or treatment of a medical condition;
4) For time away from work that is necessary due to domestic violence, sexual assault, or stalking, provided the time is used to allow the employee to obtain for the employee or the employee's family member one or more of the following:
    a. Medical attention needed to recover from physical or psychological injury or disability caused by domestic violence, sexual assault, or stalking;
    b. Services from a victim services organization;
    c. Psychological or other counseling;
    d. Relocation due to the domestic violence, sexual assault, or stalking; or

e. Legal services, including preparing for or participating in any civil or criminal legal proceeding related to or resulting from the domestic violence, sexual assault, or stalking.

5) The employee's place of business is closed by order of a public official due to a public health emergency, or the employee is providing care or assistance to a child, whose school or child care provider is closed by order of a public official due to a public health emergency.
6) Any other reason required by applicable law.

For purposes of this policy, "family member" means a child (a biological, adopted, or foster child; a stepchild; a legal ward; a child of a domestic partner; or a child of an employee standing in loco parentis); spouse (a person to whom an employee is legally married under the laws of the State of California, or the employee's domestic partner); parent (a biological, foster, or adoptive parent; a step-parent; a legal guardian; or a person who stood in loco parentis when the employee was a minor child); grandparent; grandchild; sibling (a brother or sister, whether related through half blood, whole blood, or adoption, or one who is a step-sibling); the child or parent of a spouse; or designated person (*a person identified by the employee at the time the employee requests paid sick leave)*. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available earned sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have earned sick leave available.

Notice & Documentation. Employees are required to provide reasonable notification to their supervisor of an absence taken under this policy. In the case of foreseeable absences, the Company requires reasonable advance notification – of up to seven (7) days – of the employee's intention to use earned sick leave. In the case of unforeseeable absences, the Company requires notice of the need to use earned sick leave as soon as practicable. To the maximum extent permitted by applicable law, the Company may request documentation for the use of earned sick leave of more than three (3) consecutive workdays or twenty-four (24) consecutively scheduled work hours, whichever is greater. Acceptable documentation includes documentation signed by a licensed health care provider indicating the need for the amount of earned sick leave taken.

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

Carryover & Payout. Accrued, unused earned sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of eighty (80) hours. Once the accrual cap is reached, earned sick leave will stop accruing until some is used. Accrued, unused earned sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests earned sick days or uses earned sick days, or both, is prohibited, and employees may file a complaint with the California Labor Commissioner or the San Diego Enforcement Office or a court of competent jurisdiction against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

San Francisco Paid Sick Leave (For Employees Also Covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides paid sick leave to employees who perform 56 or more hours of work within a calendar year in the City and County of San Francisco. For employees who work in the City and County of San Francisco who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick leave at the start of employment. Paid sick leave accrues at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Employees who are exempt from overtime pursuant to the California executive, administrative, and professional exemptions are assumed to work a 40-hour workweek unless their regular workweek is less than forty (40) hours, in which case, paid sick leave accrues based upon that regular workweek.

Usage. Employees can use accrued paid sick leave beginning on the 90th day of employment. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system.

Paid sick leave may be used for the following reasons:

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

violence, sexual assault, or stalking; or

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

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

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

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice & Documentation. Notice may be given to the employee's supervisor orally or in writing. If the need for paid sick leave is foreseeable, the employee must provide reasonable advance notification. In most cases, "reasonable" generally means notifying employee's supervisor at least three (3) business days of the foreseeable absence. If the need for paid sick leave is unforeseeable, the employee must provide notice as soon as practicable. In most cases, "as soon as practicable" generally means notifying the supervisor at least two (2) hours prior to the start of a work shift, if possible. In cases of accidents or sudden illnesses when an employee is not able to provide such notice under the circumstances, notice should be provided as soon as possible.

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

Payment. Eligible employees will receive payment for paid sick leave at the same rate of pay as the employee normally earns during regular work hours by the next regular

payroll period after the leave was taken unless otherwise required by applicable law, and in no event will the rate of pay be less than the San Francisco or California minimum wage, whichever is higher. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued paid sick leave carries over from year to year but is subject to the maximum accrual (accrual cap) of seventy-two (72) hours (eighty (80) hours effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. The Company prohibits discrimination and retaliation against employees who assert their rights to receive and use paid sick leave under this policy, file a complaint or allege a violation of their rights with respect to paid sick leave, cooperate in an investigation or prosecution, or oppose a policy of practice prohibited by applicable state or local law. Employees may file a complaint with the California Labor Commissioner or the San Francisco Office of Labor Standards Enforcement

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Santa Monica Paid Sick Leave (For Non-Exempt Employees also covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. The Company provides paid sick leave to eligible non-exempt employees who, in a particular week, perform at least two (2) hours of work per week for the Company in the City of Santa Monica. For employees who work in the City of Santa Monica who are eligible for paid sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Eligible employees begin accruing paid sick leave at the start of employment. Paid sick leave accrues at the rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of 6 days/48 hours (eighty (80) hours effective January 1, 2024). For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

Usage. Employees can use accrued paid sick leave on the 90th day of employment. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system.

Paid sick leave may be used for the following reasons:

1) For diagnosis, care, or treatment of an existing health condition of, or preventive care for, an employee or an employee's family member; or

2) For an employee who is a victim of domestic violence, sexual assault, or stalking:
   a) To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
   b) To help ensure the health, safety, or welfare of the victim or the victim's child;
   c) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
   d) To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
   e) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
   f) To participate in safety planning and take other actions to increase safety from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation.

For purposes of this policy, "family member" means a child (including biological, adopted, or foster child, stepchild, legal ward, or a child to whom the employee stands in loco parentis, all regardless of age or dependency status); spouse; registered domestic partner; parent (including biological, adoptive, or foster parent, stepparent, or legal guardian of an employee or the employee's spouse or registered domestic partner, or a person who stood in loco parentis when the employee was a minor child); grandparent; grandchild; sibling; or designated person (*a person identified by the employee at the time the employee requests paid sick leave)* (effective January 1, 2023). Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice & Documentation. Notice to the employee's supervisor may be given orally or in writing. If the need for paid sick leave is foreseeable, the employee must provide reasonable advance notification. If the need for paid sick leave is unforeseeable, the employee must provide notice of the need for the leave as soon as practicable. To the maximum extent permitted by applicable law, the Company may require an employee to provide reasonable documentation of an absence from work for which paid sick leave was used for more than three (3) consecutive days or 24 consecutively-scheduled work hours, whichever is greater.

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

Carryover & Payout. Accrued, unused paid sick leave carries over from year to year, but is subject to the maximum accrual (accrual cap) of 6 days/48 hours (eighty (80) hours

effective January 1, 2024). Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. Accrued, unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests paid sick leave or uses paid sick leave, or both, is prohibited, and employees may file a complaint with the California Labor Commissioner or the appropriate City designated administrative agency against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

West Hollywood Compensated and Uncompensated Leave (For Non-Exempt Employees Also Covered under the California Healthy Workplaces, Healthy Families Act)

Eligibility. Pursuant to the West Hollywood Ordinance, the Company provides compensated leave and uncompensated leave to non-exempt employees who perform at least two hours of work in a particular week of the year within the geographic boundaries of West Hollywood. Compensated leave is provided in the form of paid sick leave and paid vacation/personal necessity leave. For employees who work in West Hollywood who are eligible for paid time off under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick leave, paid vacation/personal necessity leave and uncompensated leave pursuant to this policy at the start of employment. Paid sick leave will accrue at the rate of 0.0333 hours for each hour worked, up to an overall maximum accrual of ninety-six (96) hours. Paid vacation/personal necessity leave will accrue at the rate of 0.0235 hours for each hour worked, up to a maximum annual accrual of forty-eight (48) hours and an overall maximum accrual of ninety-six (96) hours. Uncompensated leave will accrue at the rate of .039 hours for each hour worked, up to a maximum annual accrual and an overall maximum accrual of eighty (80) hours. Employees will not accrue paid vacation/personal necessity leave or uncompensated leave for hours worked in excess of forty (40) hours each week. For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

Usage. Employees can use accrued paid vacation/personal necessity leave, paid sick leave, and uncompensated leave beginning on the 90th day of employment of employment.

Paid sick leave may be used for the following reasons:

1) For diagnosis, care, or treatment of an existing health condition of, or preventive

care for, an employee or an employee's family member; or

2) For an employee who is a victim of domestic violence, sexual assault, or stalking:
    g) To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
    h) To help ensure the health, safety, or welfare of the victim or the victim's child;
    i) To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
    j) To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
    k) To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
    l) To participate in safety planning and take other actions to increase safety from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation.

For purposes of use of paid sick leave under this policy, "family member" means a child (including biological, adopted, or foster child, stepchild, legal ward, or a child to whom the employee stands in loco parentis, all regardless of age or dependency status); spouse; registered domestic partner; parent (including biological, adoptive, or foster parent, stepparent, or legal guardian of an employee or the employee's spouse or registered domestic partner, or a person who stood in loco parentis when the employee was a minor child); grandparent; grandchild; sibling; or designated person (*a person identified by the employee at the time the employee requests paid sick leave)*. Employees are limited to selecting one designated person per 12-month period for paid sick leave.

Uncompensated leave may only be used for sick leave for the illness of the employee, or the employee's immediate family member, as defined by the California Family Rights Act (CFRA).

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available. In the event employee has no paid sick leave available, unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available uncompensated leave for absences for the illness of the employee, or the employee's immediate family member.

Notice. Notice to the employee's supervisor may be given orally or in writing. If the need for leave is foreseeable, including for vacation or other personal necessity, the employee must provide reasonable advance notification. If the need for leave is unforeseeable, the employee must provide notice of the need for the leave as soon as practicable.

Requests for paid vacation/personal necessity leave will be reviewed based on a number of factors, including business needs and staffing requirements. Although the Company will attempt to accommodate a timely request, the Company cannot guarantee that such

a request will be granted on all occasions, unless otherwise required by law. The Company will not unreasonably deny an eligible employee's request to use accrued vacation/personal necessity leave.

Payment. Eligible employees will receive payment for paid sick leave and paid vacation/personal necessity leave at the same wage as the employee normally earns during regular work hours, unless otherwise required by applicable law, by next regular payroll period after the leave was taken. Eligible employees will receive no payment for uncompensated leave. Use of paid sick leave, paid vacation/personal necessity leave and uncompensated leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued paid sick leave carries over from year to year, but is subject to an overall maximum accrual of ninety-six (96) hours as set forth above. Accrued paid vacation/personal necessity leave carries over from year to year, but is subject to an overall maximum accrual of ninety-six (96) hours as set forth above. Accrued uncompensated leave carries over from year to year, but is subject to overall maximum accrual of eighty (80) hours. Once the applicable overall maximum accrual is reached, leave will stop accruing until some of the applicable leave is used. Accrued but unused paid vacation/personal necessity leave under this policy is paid at separation. Accrued but unused paid sick leave and uncompensated leave under this policy will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests or uses compensated leave or uncompensated leave, or both, is prohibited, and employees may file a complaint with the Labor Commissioner or City Manager against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Updated 1.1.24

Employee Meal Period Waiver Form

I understand that I am entitled to an uninterrupted, thirty (30) minute meal period when I work shifts that exceed five (5) hours in a workday and that I will be relieved of all duty during this time. If I work more than six (6) hours in a day, I may not waive my meal period. However, if I work less than six hours to complete a workday, I can decide on my own to waive this meal period with the consent of my employer.

Furthermore, I recognize that if I work more than ten (10) hours in a workday but less than twelve (12) hours, and I did not waive my first meal period, I am entitled to a second thirty (30) minute unpaid uninterrupted and duty-free meal period. This second meal period can be waived by mutual consent. However, I understand that if I work more than twelve (12) hours on any given day, this waiver is invalid and I do not have permission to waive my second meal period.

I understand that I can voluntarily waive my meal periods. If I wish to do so, I can select the box below my signature at the bottom of this form.

I acknowledge I can revoke these waivers at any time by notifying Human Resources in writing. I also recognize that if I do not voluntarily waive my meal period, I am obliged to inform Human Resources and my supervisor if I believe I do not have sufficient time for my meal periods, if I miss or have an interrupted meal period, or if I feel pressured to forgo them.

I acknowledge that no representations of any kind have been made to me by the Company to obtain my consent to this waiver, and I am signing this waiver voluntarily and without coercion, intimidation, or threat of retaliation.

OPTIONAL FOR EMPLOYEES WORKING LESS THAN 6 HOURS: I wish to voluntarily waive my meal period for days I work less than 6 hours. ☐ (check box if “yes”).
OPTIONAL FOR EMPLOYEES WORKING LESS THAN 12 HOURS: I wish to voluntarily waive my second meal period for days I work less than 12 hours and did not waive my first meal period. ☐ (check box if “yes”).

I have read and understand this acknowledgment.

_____
Employee Name (print)

_____
Employee Signature

_____
Date

Updated 1.1.24

Meal Period & Rest Break Premium Request Form

If you were not able to take your Company provided uninterrupted and duty free 10-minute rest break or 30-minute meal period, please use this form and indicate the date and reason below and return this form to Human Resources.

☐ I did not have the opportunity to take my first rest break on _____.

☐ I did not have the opportunity to take my second rest break on _____.

☐ I did not have the opportunity to take my third rest break on _____.

☐ I was not able to take my first meal period on _____ because _____

_____.

☐ I was not able to take my second meal period on _____ because _____

_____.

_____ _____

Employee (print first/last name) Date

Updated 1.1.24

COLORADO SUPPLEMENT

About This Colorado Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Colorado employees will receive the Company's national handbook ("Handbook") and the Colorado Supplement to the Handbook ("Colorado Supplement") (together, the "Employee Handbook").

The Colorado Supplement applies only to Colorado employees. It is intended as a resource containing specific provisions derived under Colorado law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Colorado Supplement are different from or more generous than those in the Handbook, the policies in the Colorado Supplement will apply.

The Colorado Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about the policies in this Colorado Supplement, they should contact their Human Resources representative.

Pregnancy Accommodations

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

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

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

The Company reserves the right to require an applicant or employee to provide a note stating the necessity of a reasonable accommodation from a licensed health care provider before providing a reasonable accommodation, to the extent permitted by applicable law.

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

Breaks & Meal Periods (For Non-Exempt Employees)

Rest Breaks. Non-exempt employees are authorized and permitted paid ten (10) minute rest periods for each four (4) hours of work, or major fraction of that time. For purposes of this policy, "major fraction" means any time greater than two (2) hours. An additional rest period is required for any period that rounds up to four (4) hours. For example, a shift of two (2) hours or fewer requires no rest periods, a two (2) hour and one (1) minute shift requires a single rest period, and a six (6) hour shift also requires a single rest period, but a six (6) hour and one (1) minute shift requires two (2) rest periods.

Rest breaks should be taken as close to the middle of each work period of four (4) hours or major fraction thereof as is practical. Shorter or longer shifts and other factors that make such scheduling impractical may alter this general timing. Employees do not need to obtain approval from or notify their supervisor when taking a rest break. Employees are encouraged to take their rest breaks; they are not expected to and should not work during their rest breaks. Employees are paid for all rest break periods and do not need to clock out when taking a rest break.

Rest breaks may not be combined with each other or with the meal period. In addition, rest breaks may not be taken at the beginning or end of the work day to arrive late or leave early. Each rest break must be a separate break, meeting the requirements described above. If any work is performed during a rest break, or if the rest break is interrupted for any work-related reason, the employee is entitled to another uninterrupted paid rest break.

Meal Periods. Non-exempt employees who work more than five (5) hours in a workday are provided an unpaid, off-duty and uninterrupted meal period of at least thirty (30) minutes. Employees are responsible for scheduling their own meal period, but should confirm them with their supervisor(s). To the extent practical, meal periods must be at least one (1) hour after starting and one (1) hour before ending shifts.

If an employee's type of work makes an uninterrupted, duty-free meal period impractical, the employee will be permitted to eat while working and paid for such time. Employees will be informed by their supervisor if they will be provided with on-duty meal periods.

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

Employees who record their time manually must accurately record their meal periods by recording the beginning and end of each work period. Unless otherwise directed by their supervisor in writing, employees are not required to get approval from or notify their supervisor when taking a meal period. Employees are to immediately notify Human Resources and/or their supervisor if they believe that they are prevented by the nature of their work from taking a timely and/or complete meal period.

Meal Period Waiver. Non-exempt employees may voluntarily waive their meal period in writing. See Human Resources to obtain this waiver form.

No Working During Rest Breaks and Meal Periods. Non-exempt employees are completely relieved of all work duties and responsibilities during their rest breaks and meal periods. All rest breaks and meal periods must be taken outside employees' work areas, such as in a break room. Employees may leave the premises during meal periods, but may not leave the premises during rest periods. Employees should not visit or socialize with employees who are working while taking their rest break or meal period. Employees are required to notify Human Resources immediately if they believe they are being pressured or coerced by any manager, supervisor, or other employee to forego any portion of a provided rest break or meal period. Additionally, employees are required to notify Human Resources immediately if they believe their workload, schedule, deadline, or other quota make rest break or meal periods infeasible.

Summary Chart. Below is a chart that generally summarizes the number of rest breaks and meal periods provided to non-exempt employees (these figures may vary depending on the timing of an employee's breaks).

Hours of Work	Rest Breaks	Meal Breaks
2 or fewer hours	0	0
Over 2 and up to 5 hours	1	0
Over 5 and up to 6 hours	1	1
Over 6, and up to 10 hours	2	1
Over 10, and up to 14 hours	3	1
Over 14, and up to 18 hours	4	1
Over 18, and up to 22 hours	5	1
Over 22 hours	6	1

Colorado Paid Sick Leave

Eligibility. The Company provides paid sick leave to all employees who work in Colorado. For employees who work in Colorado who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick leave pursuant to this policy at the start of employment. Employees will accrue one (1) hour of paid sick leave for every thirty (30) hours worked, up to a maximum accrual of forty-eight (48) hours each year, inclusive of any hours carried over from the prior year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid sick leave accrues based upon that normal workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued paid sick leave immediately. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system. An employee may not use more than forty-eight (48) hours of accrued paid sick leave in any year.

Employees may use accrued paid sick leave because:

1) the employee has a mental or physical illness, injury, or health condition that prevents the employee from working, needs to obtain a medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition, needs to obtain preventive medical care, or needs to grieve, attend funeral services or a memorial, or deal with financial and legal matters that arise after the death of a family member;
2) the employee needs to care for a family member who has a mental or physical illness, injury, or health condition, needs to obtain a medical diagnosis, care, or

treatment of a mental or physical illness, injury, or health condition, or needs to obtain preventive medical care;

3) the employee or the employee's family member has been the victim of domestic abuse, sexual assault, or criminal harassment and the use of leave is to:
   a. Seek medical attention for the employee or the employee's family member to recover from a mental or physical illness, injury, or health condition caused by the domestic abuse, sexual assault, or harassment;
   b. Obtain services from a victim services organization;
   c. Obtain mental health or other counseling;
   d. Seek relocation due to the domestic abuse, sexual assault, or harassment; or
   e. Seek legal services, including preparation for or participation in a civil or criminal proceeding relating to or resulting from the domestic abuse, sexual assault, or harassment;
4) due to a public health emergency, a public official has ordered closure of the employee's place of business or the school or place of care of the employee's child and the employee needs to be absent from work to care for the employee's child;
5) the employee needs to care for a family member whose school or place of care has been closed due to inclement weather, loss of power, loss of heating, loss of water, or other unexpected occurrence or event that results in the closure of the family member's school or place of care; or
6) the employee needs to evacuate the employee's place of residence due to inclement weather, loss of power, loss of heating, loss of water, or other unexpected occurrence or event that results in the need to evacuate the employee's residence.

For purposes of this policy, "family member" means a person who is related to the employee by blood, marriage, civil union, or adoption, a child to whom the employee stands in loco parentis or a person who stood in loco parentis to the employee when the employee was a minor or a person for whom the employee is responsible for providing or arranging health- or safety-related care.

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

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice and Documentation. Employees may make requests to use paid sick leave orally, in writing, electronically, or by any other means acceptable to the Company. When possible, employee should include the expected duration of the absence. Employees must provide reasonable advance notice of the need to use accrued paid sick leave to their supervisor if the need is foreseeable and also must make a reasonable effort to schedule the use of paid sick leave in a manner that does

not unduly disrupt the operations of the Company. Where the need is not foreseeable, employees should provide notice as early as practicable.

The Company may require reasonable documentation that the paid sick leave was used for a purpose authorized under applicable law for paid sick leave used for four (4) or more consecutive workdays. The Company will not require the disclosure of details relating to domestic violence, sexual assault, or stalking or the details of an employee's or an employee's family member's health information as a condition of providing paid sick leave.

Payment. Paid sick leave will be paid at the same hourly rate or salary and with the same benefits, including health care benefits, as the employee normally earns during hours worked, unless otherwise provided by applicable law. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty-eight (48) hours of accrued, unused paid sick leave under this policy to the following calendar year. If an employee carries over unused paid sick leave from the prior year, the employee will be eligible to accrue only enough hours of paid sick leave in the following year to bring the employee to the forty-eight (48) hours maximum, regardless of how much paid sick leave the employee used in the previous year and when it is used. Accrued but unused paid sick leave under this policy will not be paid at separation.

Additional Public Health Emergency Paid Sick Leave. In addition to paid sick leave accrued as set forth above, on the date a public health emergency is declared, the Company will supplement each employee's accrued paid sick leave as necessary to ensure that an employee may take the following amounts of paid sick leave for the purposes specified below: for employees who normally work forty (40) or more hours in a week, at least eighty (80) hours; for employees who normally work fewer than forty (40) hours in a week, at least the greater of either the amount of time the employee is scheduled to work in a fourteen (14) day period or the amount of time the employee actually works on average in a fourteen (14) day period. The Company may count an employee's unused accrued paid sick leave as forth above toward the supplemental paid sick leave required for a public health emergency. An employee may use public health emergency paid sick leave until four (4) weeks after the official termination or suspension of the public health emergency. Employees may use public health emergency paid sick leave for the following absences related to a public health emergency:

1) an employee's need to self-isolate and care for oneself because the employee is diagnosed with a communicable illness that is the cause of a public health emergency, self-isolate and care for oneself because the employee is experiencing symptoms of a communicable illness that is the cause of a public health emergency, seek or obtain medical diagnosis, care, or treatment if experiencing symptoms of a communicable illness that is the cause of a public health emergency, seek preventive care concerning a communicable illness that is the cause of a public health emergency; or

2) an employee's need to care for a family member who is self-isolating after being diagnosed with a communicable illness that is the cause of a public health emergency, is self-isolating due to experiencing symptoms of a communicable illness that is the cause of a public health emergency, needs medical diagnosis, care, or treatment if experiencing symptoms of a communicable illness that is the cause of a public health emergency, or is seeking preventive care concerning a communicable illness that is the cause of a public health emergency;
3) with respect to a communicable illness that is the cause of a public health emergency:
    a. A local, state, or federal public official or health authority having jurisdiction over the location in which the employee's place of employment is located or the employee's employer determines that the employee's presence on the job or in the community would jeopardize the health of others because of the employee's exposure to the communicable illness or because the employee is exhibiting symptoms of the communicable illness, regardless of whether the employee has been diagnosed with the communicable illness; or
    b. Care of a family member after a local, state, or federal public official or health authority having jurisdiction over the location in which the family member's place of employment is located or the family member's employer determines that the family member's presence on the job or in the community would jeopardize the health of others because of the family member's exposure to the communicable illness or because the family member is exhibiting symptoms of the communicable illness, regardless of whether the family member has been diagnosed with the communicable illness;
4) care of a child or other family member when the individual's child care provider is unavailable due to a public health emergency, or if the child's or family member's school or place of care has been closed by a local, state, or federal public official or at the discretion of the school or place of care due to a public health emergency, including if a school or place of care is physically closed but providing instruction remotely;
5) an employee's inability to work because the employee has a health condition that may increase susceptibility to or risk of a communicable illness that is the cause of the public health emergency.

Employees must notify the Company of the need for public health emergency paid sick leave as soon as practicable when the need for paid sick leave is foreseeable and the Company's place of business has not been closed. Documentation is not required to take public health emergency paid sick leave. Employees are only eligible for public health emergency paid sick leave in the amount described above once during the entirety of a public health emergency even if such public health emergency is amended, extended, restated, or prolonged.

Enforcement & Retaliation. The Company cannot retaliate against an employee for

requesting or using paid sick leave and an employee has the right to file a complaint with the Division of Labor Standards and Statistics in the Colorado Department of Labor and Employment or bring a civil action if paid sick leave is denied by the Company or the Company retaliates against the employee for exercising the employee's rights under applicable law.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Colorado Paid Family and Medical Leave

Eligibility Requirements

Effective January 1, 2024, Colorado employees who have a qualifying condition and who earned $2,500 over the previous year for work performed in Colorado will be eligible for paid family and medical leave, and to receive family and medical leave insurance benefits while taking paid family and medical leave, pursuant to Colorado's Family and Medical Leave Insurance (FAMLI) Program. All employees are required to contribute to the FAMLI Program and will be subject to payroll deductions not to exceed the maximum employee premium rate established by law.

Entitlement

Eligible employees are entitled to up to 12 weeks of paid leave per year. Individuals with serious health conditions caused by pregnancy complications or childbirth complications may be entitled to up to 4 additional weeks of paid leave per year for a total of up to 16 weeks.

FAMLI leave is available for the following circumstances:

- Caring for a new child during the first year after the birth, adoption, or foster care placement of that child;
- Caring for a family member with a serious health condition;
- For an employee's own serious health condition;
- Because of any qualifying exigency leave; or
- For safe leave.

Family member means: **(a)** Regardless of age, a biological, adopted or foster child, stepchild or legal ward, a child of a domestic partner, a child to whom the covered individual stands in loco parentis, or a person to whom the covered individual stood in loco parentis when the person was a minor; **(b)** A biological, adoptive or foster parent, stepparent or legal guardian of a covered individual or covered individual's spouse or domestic partner or a person who stood in loco parentis when the covered individual or covered individual's spouse or domestic partner was a minor child; **(c)** A person to whom the covered individual is legally married under the laws of any state, or a domestic partner of a covered individual as defined in section 24-50-603 (6.5); **(d)** A grandparent, grandchild or sibling (whether a biological, foster, adoptive or step relationship) of the covered individual or covered individual's spouse or domestic partner; or **(e)** As shown by the covered individual, any other individual with whom the

covered individual has a significant personal bond that is or is like a family relationship, regardless of biological or legal relationship.

Caring for a new child means caring, bonding, and providing the basic needs of a child that is under the age of 18 and sometimes up to the age of 21 if still under jurisdiction of the juvenile court. Leave can be used once during the fostering and adopting of the same child. When using leave to “care for a new child,” benefits are limited to parents and individuals standing in loco parentis to the child.

Qualifying exigency leave means leave based on a need arising out of a covered individual’s family member’s active duty service or notice of an impending call or order to active duty in the armed forces. This type of leave includes things like providing for the care or other needs of the military member’s child or other family member, making financial or legal arrangements for the military member, attending counseling, attending military events or ceremonies, spending time with the military member during a rest and recuperation leave or following return from deployment, or making arrangements following the death of the military member.

A **serious health condition** means an illness, injury, impairment, pregnancy, recovery from childbirth, or physical or mental condition that involves inpatient care in a hospital, hospice or residential medical care facility, or continuing treatment by a health care provider.

Safe leave means any leave needed because the covered individual or the covered individual’s family member is the victim of domestic violence, the victim of stalking, or the victim of sexual assault or abuse if the covered individual is using the leave from work to protect the covered individual or the covered individual’s family member by: (a) Seeking a civil protection order to prevent domestic violence; (b) Obtaining medical care or mental health counseling or both for them or for their children to address physical or psychological injuries resulting from the act of domestic violence, stalking, or sexual assault or abuse; (c) Making their home secure from the perpetrator of the act of domestic violence, stalking, or sexual assault or abuse, or seeking new housing to escape said perpetrator; or (d) Seeking legal assistance to address issues arising from the act of domestic violence, stalking, or sexual assault or abuse, or attending and preparing for court- related proceedings arising from said act or crime.

Substitution of FAMLI Benefits with Company Benefits

Employees may choose to use sick leave or other paid time off before using FAMLI benefits, but are not required to do so. The Company and employees may mutually agree to supplement FAMLI benefits with sick leave or other paid time off in order to provide full wage replacement.

Use of Leave

Leave may be taken continuously, intermittently, or in the form of a reduced schedule. A covered individual may take intermittent leave in increments of either one hour or shorter periods if consistent with the increments the Company typically uses to measure

employee leave, except that benefits are not payable until the covered individual accumulates at least eight hours of family and medical leave insurance benefits. FAMLI wage replacement benefits will be paid at a rate of up to 90% of the employee's average weekly wage with lower wage earners receiving a higher percentage. Benefits are calculated on a sliding scale using the individual's average weekly wage from the previous five calendar quarters in relation to the average weekly wage for the state of Colorado and may increase over time. Benefits are capped at $1,100 per week. Potential benefits can be estimated by using the calculator available at famli.colorado.gov.

Employee Notice to the Company

When the need for leave is foreseeable, individuals must provide not less than thirty (30) days' notice prior to the start of their planned leave to the Company when practicable and shall make a reasonable effort to schedule leave so as not to unduly disrupt the operations of the Company. When the need for leave is unforeseeable or providing 30 days' notice is not possible, individuals must provide notice as soon as possible and have up to thirty (30) days after the leave has begun to apply for FAMLI benefits.

Employee Application to the Department

Individuals or their designated representatives will apply for FAMLI benefits by submitting an application, along with other required documents that support the need for leave. The division will establish reasonable procedures and forms for filing claims for benefits and will specify what supporting documentation is necessary to support a claim for benefits, including any documentation required from a health care provider for proof of a serious health condition and any documentation required by the division with regards to a claim for safe leave. Instructions on how to apply for benefits will be available on famli.colorado.gov in the last quarter of 2023.

Employees will submit the application directly to the FAMLI Division. Applications may be submitted in advance when the need for qualified leave is foreseeable. Approved applications will be paid by the FAMLI Division within two weeks after the claim is properly filed, and every two weeks thereafter. Employees can appeal claim determinations to the FAMLI Division.

Individuals who attempt to defraud the FAMLI program may be disqualified from receiving benefits.

Job Benefits & Protection

Employees are entitled to the same healthcare benefits while on FAMLI leave, but you also remain responsible for paying for those benefits in the same amounts as before the leave began.

An employee who has worked for the Company for at least 180 days is entitled to return to the same position, or an equivalent position, upon their return from FAMLI leave. Otherwise, employees taking FAMLI leave are not guaranteed job reinstatement unless

they qualify for such reinstatement under federal and/or state leave laws or other applicable laws.

Interaction with Other Leave Policies

FAMLI leave is designed to run concurrently with the federal FMLA and Colorado Family Care Leave, pursuant to Colo. Rev. Stat. § 8-13.3-203. If FAMLI leave is used for a reason that also qualifies as leave under FMLA or Colorado Family Care Leave, then the leave may also count as FMLA leave or Colorado Family Care Leave used, as applicable. Employees may choose to use sick leave or other employer-provided paid time off before using FAMLI benefits, but are not required to do so. If mutually agreed upon with the Company, employees may supplement FAMLI benefit payments with sick leave or other paid time off in order to receive full wage replacement.

Questions and/or Complaints about FAMLI Leave

If you have questions regarding this FAMLI policy, please contact Human Resources. For questions about determinations by the Department on leave eligibility, entitlement, and/or benefits, please contact the Department directly. The Company is committed to complying with the FAMLI and, whenever necessary, shall interpret and apply this policy in a manner consistent with the FAMLI.

The FAMLI makes it unlawful for employers to discriminate, retaliate, threaten to retaliate or interfere with the exercise of any rights under the FAMLI. In addition, employers may not retaliate or threaten to retaliate against any person who has filed a complaint, has caused a complaint to be filed, has or will participate or testify in proceeding relating to a violation of the FAMLI, or has given or is about to give information connected to a proceeding relating to a violation of the FAMLI. If employees believe their FAMLI rights have been violated, they should contact Human Resources immediately. The Company will investigate any FAMLI complaints and take prompt and appropriate remedial action to address and/or remedy any FAMLI violation. Employees also may file FAMLI complaints with the Department alleging FAMLI violations.

Updated 1.1.24

COLORADO
Department of Labor and Employment

COLORADO OVERTIME & MINIMUM PAY STANDARDS ORDER ("COMPS Order") #39, POSTER & NOTICE

Effective 1/1/24: must update annually; new poster available each December

Colorado Minimum Wage: inflation-adjusted annually; $14.42/hour in 2024, (Rule 3)

- Employees must be paid at least minimum wage (whether hourly, salary, commission, piecework, etc.) unless exempt
- Unemancipated minors can be paid 15% less than full minimum wage
- Use the highest minimum wage that applies; all local minimum wages are posted at **ColoradoLaborLaw.gov**

Overtime: 1½ times regular pay rates for hours over 40 weekly, 12 daily, or 12 consecutive (Rule 4)

- Overtime is required *each* week over 40 hours, or day over 12, even if 2 or more weeks or days *average* fewer hours
- Employers cannot provide time off ("comp time") instead of time-and-a-half premium pay for overtime hours
- Key variances/exemptions (all are detailed in Rules 2.3-2.4):
  - Modified overtime in a small number of health care jobs; exemption for certain heavy vehicle drivers
  - No 40-hour weekly overtime in downhill ski/snowboard jobs (but 56-hour overtime for many under federal law)
  - Agriculture: overtime after 48-56 hours (based on size and seasonality); extra breaks and pay on long days

Meal Periods: 30 minutes uninterrupted and duty-free, for shifts over 5 hours (Rule 1.9)

- Can be unpaid, but only if employees are completely relieved of all duties, and allowed to pursue personal activities
- If work makes uninterrupted meal periods impractical, eating on-duty must be permitted, and the time must be paid
- To the extent practical, meal periods must be at least 1 hour after starting and 1 hour before ending shifts

Rest Periods: 10 minutes, paid, every 4 hours (Rule 5.2)

#Work Hours:	Up to 2	>2, up to 6	>6, up to 10	>10, up to 14	>14, up to 18	>18, up to 22	>22
#Rest Periods:	0	1	2	3	4	5	6

- Need not be off-site, but must not include work, and should be in the middle of the 4 hours to the extent practical
- Rest periods are time worked for minimum wage and overtime purposes, and if employers do not authorize and permit rest periods, they must pay extra for time that would have been rest periods, including for non-hourly-paid employees
- Key variances/exemptions:
  - In some circumstances, 10-minute rest periods can be divided into two of 5 minutes (Rule 5.2.1)
  - Agriculture: certain work requires more breaks; other is exempt (Rule 2.3, & Agricultural Labor Conditions Rules)

Time Worked: Pay for time employers allow performing labor/service for their benefit (Rule 1.9)

- All time on-premises, on duty, or at workplaces (but not just letting off-duty employees be on-premises), including:
  - putting on/removing work clothes/gear (but not clothes worn outside work), cleanup/setup, or other off-clock duty,
  - waiting for assignments at work, or receiving or sharing work-related information,
  - security/safety screening, or clocking/checking in or out, or
  - waiting for any of the above tasks.
- Travel for employer benefit is time worked; normal home/work travel is not (details in Rule 1.9.2)
- Sleep time, if sufficiently uninterrupted and lengthy, can be excluded in certain situations (details in Rule 1.9.3)

Deductions, Credits, Charges, & Withheld Pay (Rule 6, and Article 4 of C.R.S. Title 8)

- Final pay: Owed promptly (if a termination by employer) or at next pay date (if employee resigned)
- Vacation pay: Departing employees must be paid all accrued and unused vacation pay, including paid time off usable for vacation, without deducting or declaring forfeiture based on cause for termination, lack of resignation notice, etc.
- Deductions from pay: Allowed if listed below or in C.R.S. 8-4-105 (including deductions required by law, in a written agreement for the benefit of the employee, for theft in a police report, or for property loss after audit/notice)
- Tip credits: Employers can pay up to $3.02 below the highest applicable minimum wage (Colorado or local), if: (a) tips (not mandatory service charges) raise pay to full minimum, & (b) tips aren't diverted to non-tipped staff/owners
- Meal credits/deductions: Allowed for the cost or value (without employer profit) of voluntarily accepted meals
- Lodging credits/deductions: Allowed if housing is voluntarily accepted by the employee, primarily for the employee's (not the employer's) benefit, recorded in writing, and limited to $25 or $100 per week (based on housing type)
- Uniforms: Must be provided at no cost unless they are ordinary clothes without special material or design; employers must pay for any special cleaning required, and cannot require deposits or deduct for ordinary wear and tear

Exemptions from COMPS (Rule 2.2 lists all; key exemptions are below)

- Executives/supervisors, administrators, and professionals paid at least a salary (not hourly wages) of $55,000 in 2024 (then inflation-adjusted in future years), except $33.17/hour for highly technical computer work
- Other highly compensated, non-manual-labor employees paid at least 2.25 the above salary ($123,750 in 2024)
- 20% owners, or at a nonprofit the highest-paid/highest-ranked employee, if actively engaged in management
- Various (not all) types of salespersons, taxi drivers, camp/outdoor education field staff, or property managers

Record-Keeping & Notices of Rights (Rule 7)

- Employers must give all employees (and keep for three years) pay statements that include time worked, pay rate (including any tips and credits), and total pay
- This year's poster must be displayed where easily accessible, or if not practical (such as for remote workers), provided within one month of beginning work and when employees request a copy
- Employers must include a copy of this poster, or the COMPS Order, in any employment handbook or manual
- Violation of notice of rights rules (posting or distribution), including by providing information undercutting this poster, may yield fines and/or ineligibility for employee-specific credits, deductions, or exemptions in COMPS

Complaint & Anti-Retaliation Rights (Rule 8)

- Employees can send the Division (contact info below) complaints or tips about violations, or file lawsuits in court
- Employers cannot retaliate against, or interfere with, employees exercising their rights
- Anonymous tips are accepted; anonymity or confidentiality are protected if requested (Wage Protection Rule 4.7)
- Owners and other individuals with control over work may be liable for certain violations — not just the business, even if the business is a corporation, partnership, or other entity separate from its owner(s) (Rule 1.6)
- Immigration status is irrelevant to these labor rights: the Division will not ask or report status in investigations or rulings, and it is illegal for anyone to use immigration status to interfere with these rights (Wage Protection Rule 4.8)

This Poster is a summary and cannot be relied on as complete labor law information. For all rules, fact sheets, translations, questions, or complaints, contact:
DIVISION OF LABOR STANDARDS & STATISTICS, ColoradoLaborLaw.gov, cdle_labor_standards@state.co.us, 303-318-8441 / 888-390-7936

Updated 1.1.24

CONNECTICUT SUPPLEMENT

About This Connecticut Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Connecticut employees will receive the Company's national handbook ("Handbook") and the Connecticut Supplement to the Handbook ("Connecticut Supplement") (together, the "Employee Handbook").

The Connecticut Supplement applies only to Connecticut employees. It is intended as a resource containing specific provisions derived under Connecticut law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Connecticut Supplement are different from or more generous than those in the Handbook, the policies in the Connecticut Supplement will apply.

The Connecticut Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Sexual Harassment (Addendum to Sexual and Other Unlawful Harassment policy)

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

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

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

Individuals may also be subject to additional criminal penalties stemming from acts of sexual harassment.

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

Pregnancy Accommodations

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

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

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

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

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

Paid Family and Medical Leave Benefits

The Paid Family and Medical Leave Act is a mandatory statewide insurance program administered by the state-created Paid Leave Authority. Employees may be eligible for

Connecticut Paid Family and Medical Leave ("CPL") income replacement benefits. Benefits are financed through employee contributions to the program. The Authority is **solely** responsible for determining whether an employee is eligible for benefits and the amount of any benefits payable.

It is the **employee's** responsibility to apply for CPL benefits and to cooperate in the CPL application process. It is also the **employee's** responsibility to **immediately** provide the Company with the Employer Verification form upon receipt of this form from the Authority. The form must be sent to Human Resources - Benefits via email. The employee must also provide Human Resources – Benefits with confirmation of 1) the application for benefits and 2) the approval of benefits and amount to be received.

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

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

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

Covered reasons. Employees may apply for CPL benefits for:

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

Connecticut Family and Medical Leave Policy (Addendum to FMLA Policy)

Like the Family and Medical Leave Act ("FMLA") Policy described elsewhere in this Handbook, the Connecticut Family and Medical Leave Act ("CFMLA") may require employers to provide family and medical leaves of absence for eligible employees. Either or both of these laws may apply to a leave. This policy will be interpreted to comply with the law(s) that apply to a particular leave. To the extent that state law mandates additional protection for pregnant employees, this policy also will be interpreted consistently with such requirements. This policy provides employees information concerning any CFMLA entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this handbook. If employees have any questions concerning CFMLA leave, they should contact Human Resources.

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

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

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

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

related to a person by blood, marriage, adoption by a parent of the person, or foster care placement.

Additional Military Family Leave Entitlement (Injured Servicemember Leave). In addition to the basic FMLA and CFMLA leave entitlements, an eligible employee who is the spouse, son, daughter, parent or next of kin (as these relationships are defined by each law) of a covered servicemember is entitled to take up twenty-six (26) weeks of leave during a single 12-month period to care for the servicemember with a serious injury or illness. For purposes of Injured Servicemember Leave under the CFMLA, "next of kin" means the armed forces member's nearest blood relative, other than the covered armed forces member's spouse, parent, son or daughter, in the following order of priority: Blood relatives who have been granted legal custody of the armed forces member by court decree or statutory provisions, brothers and sisters, grandparents, aunts and uncles, and first cousins, unless the covered armed forces member has specifically designated in writing another blood relative as their nearest blood relative or any other individual whose close association with the employee is the equivalent of a family member for purposes of military caregiver leave, in which case the designated individual shall be deemed to be the covered armed forces member's next of kin; and "son or daughter" means a biological, adopted or foster child, stepchild, legal ward or child for whom the eligible employee or armed forces member stood in loco parentis and who is any age.

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

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

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

Unlawful Acts. It is unlawful to retaliate against an employee who requests to use or uses leave under the CFMLA or otherwise exercises rights under CFMLA or to interfere with, restrain or deny the exercise of any rights under CFMLA. It is also unlawful to

discharge or discriminate against any person for opposing any practice made unlawful by CFMLA or for involvement in any proceeding under or relating to CFMLA.

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

Connecticut Paid Sick Leave

Eligibility. The Company provides paid sick leave to certain non-exempt regular full-time and part-time **service employees** in Connecticut, to the extent required by law. For employees who work in Connecticut who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin to accrue paid sick leave pursuant to this policy at the start of employment. Employees accrue paid sick leave in one (1) hour increments at a rate of one (1) hour for every forty (40) hours worked, up to a maximum of forty (40) hours per year. For purposes of this policy, the year is the 365-day period beginning January 1st and ending on December 31st.

Usage. Employees are only eligible to utilize paid sick leave under this policy upon completion of the employee's 680th hour of employment, unless the Company agrees to an earlier date. Further, an employee may not utilize paid sick leave under this policy if the employee did not work an average of ten (10) or more hours per week for the Company in the most recent complete quarter. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system. An employee may not use more than forty (40) hours of accrued sick leave in a year.

An employee may use paid sick leave under this policy for the following reasons:

1) An employee's illness, injury or health condition;
2) The medical diagnosis, care or treatment of an employee's mental illness or physical illness, injury or health condition;
3) Preventative medical care for an employee;
4) A mental health wellness day to attend to the employee's emotional and psychological well-being in lieu of attending a regularly scheduled shift;
5) An employee's child's or spouse's illness, injury or health condition;
6) The medical diagnosis, care or treatment of an employee's child's or spouse's mental or physical illness, injury or health condition; or
7) Preventative medical care for a child or spouse of an employee.

An employee may also use paid sick leave under this policy, where the employee is a victim of family violence or sexual assault or the parent or guardian of a child who is a victim of family violence or sexual assault, provided such service worker is not the perpetrator or alleged perpetrator of such family violence or sexual assault, for the following reasons:

1) For medical care or psychological or other counseling for physical or psychological injury or disability;
2) Obtaining services from a victim services organization;
3) Relocating due to such family violence or sexual assault; or
4) Participating in any civil or criminal proceedings related to or resulting from such family violence or sexual assault.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice and Documentation. When the need to use paid sick leave under this policy is foreseeable, employees must provide seven (7) days prior notice of the planned use of paid sick leave under this policy. When the need to use paid sick leave under this policy is not foreseeable, the employee must provide notice, preferably in writing, as soon as possible.

For paid sick leave of three (3) or more consecutive days, employees must provide reasonable documentation that such leave is being taken for the purpose permitted under this policy. If such leave is permitted for reasons other than where the employee is a victim of family violence or sexual assault, documentation signed by a health care provider who is treating the employee or the employee's child or spouse indicating the need for the number of days of such leave is considered reasonable documentation. If such leave is permitted where the employee is a victim of family violence or sexual assault, a court record or documentation signed by the employee or volunteer working for a victim services organization, an attorney, a police officer or other counselor involved with the employee is considered reasonable documentation.

Payment. Paid sick leave under this policy will be calculated based on the employee's base pay rate at the time of absence, unless otherwise required by applicable law. It does not include overtime or any special forms of compensation such as incentives, commissions, or bonuses. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused paid sick leave under this policy to the following year. Accrued but unused paid sick leave under this policy will not be paid at separation.

Enforcement & Retaliation. Employees may be subject to discipline for using paid sick leave under this policy for purposes other than those provided under this policy. The Company is prohibited from retaliating against an employee for requesting or using paid sick leave for which the employee is eligible. Employees have the right to file a complaint with the Labor Commissioner for retaliation and/or failing to provide paid sick leave in accordance with the applicable law.

Employees with questions regarding this policy can contact Human Resources.

Privacy Protection Policy

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

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

Updated 1.1.24

DELAWARE SUPPLEMENT

About This Delaware Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Delaware employees will receive the Company's national handbook ("Handbook") and the Delaware Supplement to the Handbook ("Delaware Supplement") (together, the "Employee Handbook").

The Delaware Supplement applies only to Delaware employees. It is intended as a resource containing specific provisions derived under Delaware law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Delaware Supplement are different from or more generous than those in the Handbook, the policies in the Delaware Supplement will apply.

The Delaware Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Pregnancy Accommodations

In compliance with Delaware law (19 Del. C. § 710 et seq.), the Company will not discriminate against an applicant or employee because of pregnancy, childbirth, or related conditions. The Company will treat applicants and employees, whom the employer knows or should know are pregnant, as well as other applicants and employees who are similar in their ability or inability to work but are not pregnant, without regard to the source of any condition affecting the other applicants' or employees' ability or inability to work.

The Company will endeavor to provide a reasonable accommodation to known pregnancy-related limitations of applicants and employees unless the accommodation would impose an undue hardship on the operation of the Company's business. The Company will not require an applicant or employee to accept an accommodation if the individual does not have a known pregnancy-related limitation or if the accommodation is not necessary for performance of the essential duties of the job, nor will the Company force a pregnant employee to take paid or unpaid leave if another reasonable accommodation is available which will permit the employee to continue working.

The Company will not deny employment opportunities or take adverse action against a pregnant employee with respect to the terms, conditions, or privileges of employment or for requesting or accepting a reasonable accommodation.

Reviewed 1.1.24

DISTRICT OF COLUMBIA SUPPLEMENT

About This District of Columbia Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, District of Columbia employees will receive the Company's national handbook ("National Handbook") and the District of Columbia Supplement to the National Handbook (“District of Columbia Supplement”) (together, the "Employee Handbook").

The District of Columbia Supplement applies only to District of Columbia employees. It is intended as a resource containing specific provisions derived under District of Columbia law that apply to the employee's employment. It should be read together with the National Handbook and, to the extent that the policies in the District of Columbia Supplement are different from or more generous than those in the National Handbook, the policies in the District of Columbia Supplement will apply.

The District of Columbia Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you:State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Accommodations For Pregnancy, Childbirth And Breastfeeding

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

In accordance with D.C. law, the Company will provide reasonable daily break periods to accommodate an employee who is a nursing mother desiring to express breast milk for the employee’s child. The break time, if possible, will run concurrently with any rest

and meal periods already provided to the employee. If the break time cannot run concurrently with rest and meal periods already provided to the employee, the break time will be unpaid. The Company must provide a sanitary location so that breastfeeding mothers are able to express breast milk for their children. This location may be the employee's private office, if applicable

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

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

D.C. Accrued Sick and Safe Leave

Eligibility. The Company provides paid leave to all D.C. employees pursuant to the D.C. Accrued Sick and Safe Leave Act, as amended. For employees who work in D.C. who are eligible for sick and safe leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin to accrue paid leave at the start of employment. Employees accrue paid leave at a rate of one (1) hour for every 37 hours worked, up to a maximum of 7 days per calendar year. Exempt employees do not accrue paid leave for hours worked beyond a forty (40) hour workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using paid leave under this policy after the 90th day of employment. Paid leave may be used in the smallest increment of time tracked by the Company's payroll system. An employee may not use more than 7 days of accrued paid leave per calendar year.

An employee may use paid leave under this policy for the following reasons:

1) An absence resulting from a physical or mental illness, injury, or medical condition of the employee;
2) An absence resulting from obtaining professional medical diagnosis or care or preventive medical care for the employee; or
3) An absence for the purpose of caring for a family member who has any of the conditions or needs for diagnosis or care described in (1) and (2) above.

An employee may also use paid leave for an absence if the employee or the employee's family member is a victim of stalking, domestic violence, or sexual abuse and the absence is directly related to medical, social, or legal services pertaining to the stalking, domestic violence, or sexual abuse for the purposes of:

1) Seeking medical attention for the employee or the employee's family member to treat or recover from physical or psychological injury or disability caused by the stalking, domestic violence, or sexual abuse;
2) Obtaining services for the employee or the employee's family member from a victim services organization;
3) Obtaining psychological or other counseling services for the employee or the employee's family member;
4) Temporary or permanent relocation of the employee or the employee's family member;
5) Taking legal action, including preparing for or participating in a criminal or civil proceeding related to or resulting from stalking, domestic violence, or sexual abuse; or
6) Taking other actions that could be reasonably determined to enhance the physical, psychological, or economic health or safety of the employee or the employee's family member or the safety of those who work or associate with the employee.

For purposes of this policy, family member includes a child (including a foster child and grandchild); parent; spouse; domestic partner; the parent of a spouse; spouse of child; parents; sibling; spouse of sibling; a child who lives with an employee and for whom the employee permanently assumes and discharges parental responsibility; and a person with whom the employee shares or has shared, for not less than the preceding 12 months, a mutual residence and with whom the employee maintains a committed relationship, as defined in D.C. Code § 32-701(1)).

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid leave available.

Notice & Documentation. Employees are required to make a reasonable effort to schedule paid leave in a manner that does not unduly disrupt the Company's operations. If paid leave is requested in a non-emergency situation, the employee must consult with their supervisor regarding the date and time of the paid leave to be taken. If possible, employees must provide at least ten (10) days prior notice of the planned use of paid leave under this policy. Where the need is unforeseeable (i.e., ten (10) days prior notice is not possible), the employee must provide notice prior to the start of the workday/shift for which the paid leave is requested, ideally in writing (but oral notice is permitted). In the case of an emergency, employees must notify their supervisor of need to use paid leave prior to the start of the employee's *next* workday/shift or within twenty-four (24) hours of the onset of the emergency, whichever occurs sooner.

When the requested leave under this policy is for three (3) or more consecutive days, employees are required to provide reasonable certification of the reason for leave no later than one (1) day after they return from leave. A reasonable certification may include:

1) A signed document from a health care provider affirming the illness of the employee or the employee's family member;
2) A police report or court order indicating that the employee or the employee's family member was the victim of stalking, domestic violence, or sexual abuse;
3) A signed written statement from a victim/witness advocate, domestic violence counselor, attorney, or other similar professional affirming that the employee or employee's family member (1) is involved in legal action or proceedings related to stalking, domestic violence, or sexual abuse (including only the name of the employee or employee's family member who is a victim and the date on which services were sought) or (2) sought services to enhance the physical, psychological, economic health or safety of the employee or employee's family member.

Payment. Paid leave under this policy will be calculated based on the employee's base pay rate at the time of absence, unless otherwise required by applicable law, which is no event will be less than minimum wage. It does not include overtime or any special forms of compensation such as incentives, commissions, or bonuses. Use of paid leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to 7 days of accrued, unused paid leave under this policy. Accrued but unused paid leave under this policy will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliation against any employee who asserts their rights to receive paid leave under this policy. The Office of Wage-Hour of the DC Department of Employment Services can investigate possible violations. To request full text of the Act, to obtain a copy of the rules associated with this Act, or to file a complaint, contact the Office of Wage-Hour at (202) 671-1880, 4058 Minnesota Avenue, N.E., 4th Floor, Washington, D.C. 20019, or visit www.does.dc.gov.

Employees with questions regarding this policy can contact Human Resources – Benefits Team.

D.C. Paid Leave Benefits

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

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

Paid leave benefits are available for the following covered events:

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

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

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

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

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

The maximum amount of paid leave benefits that may be received in the aggregate, for any number of combination of leave events, within a fifty-two (52) calendar week period is 12 workweeks, except when an employee receives both prenatal and parental leave,

the employee can receive both prenatal and parental leave for a total leave time of up to 14 workweeks.

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

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

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

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

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

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

Employees with questions regarding these benefits can contact Human Resources – Benefits Team.

D.C. Family and Medical Leave (Addendum to FMLA Policy)

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

Eligibility. Employees are eligible for DCFMLA leave if they have worked in the District of Columbia:

1) Continuously for at least twelve (12) months;
2) For at least 1,000 hours of service during the 12-month period immediately preceding the leave; and
3) For an employer with at least twenty (20) employees in the District of Columbia.

Employees may qualify for leave under both the FMLA and DCFMLA.

Basic Family and Medical Leave Entitlement. The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. Under the DCFMLA, an eligible employee may take up to sixteen (16) workweeks of family leave (leave to care for a family member for the reasons outlined below or in the FMLA policy), plus up to sixteen (16) workweeks of medical leave (leave for an employee's own serious health condition), for a total of thirty-two (32) workweeks during any 24-month period. The 12- or 24-month period in which employees may take FMLA or DCFMLA leave is calculated as a rolling 12- or 24-month period measured backward from the date the employee uses any FMLA or DCFMLA leave. Where both laws apply, the leave provided by each will run concurrently.

In addition to the entitlements outlined in the FMLA policy, DCFMLA leave may also be taken for any one, or for a combination, of the following reasons:

1) The placement of a child for whom the employee permanently assumes and discharges parental responsibility; or
2) To care for a person to whom the employee is related by blood, legal custody, or marriage; child who resides with the employee and for whom the employee permanently assume and discharge parental responsibility; or person with whom the employee shares or has shared within last year a mutual residence and maintain a committed relationship, when that person has a "serious health

condition."

However, unlike the FMLA, the DCFMLA does not cover leave for certain qualifying exigencies

Substitution of Paid Leave for Unpaid Leave. Employees may use any accrued paid time off while taking FMLA leave. If leave is covered by the DCFMLA, employees may elect to "substitute" accrued paid time off for unpaid leave, but are not required to do so. An employee's decision to decline substitution of paid leave for unpaid DCFMLA leave time does not extend the length of the FMLA and/or DCFMLA leave. In addition, the substitution of paid time for unpaid FMLA or DCFMLA leave time does not extend the length of FMLA leaves and the paid time will run concurrently with an employee's FMLA entitlement.

Leaves of absence taken in connection with a disability leave plan or workers' compensation injury/illness will run concurrently with any FMLA and/or DCFMLA leave entitlement.

Updated 1.1.24

HAWAII SUPPLEMENT

About This Hawaii Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Hawaii employees will receive the Company's national handbook ("Handbook") and the Hawaii Supplement to the Handbook ("Hawaii Supplement") (together, the "Employee Handbook").

The Hawaii Supplement applies only to Hawaii employees. It is intended as a resource containing specific provisions derived under Hawaii law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Hawaii Supplement are different from or more generous than those in the Handbook, the policies in the Hawaii Supplement will apply.

The Hawaii Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Hawaii Family Leave (Addendum to FMLA Policy)

In addition to the Family and Medical Leave Act ("FMLA") Policy described elsewhere in this Handbook, the Hawaii Family Leave Law ("HFLL") may require employers to provide leaves of absence for eligible employees for certain family reason. Either or both of these laws may apply to a leave. This policy provides employees information concerning any HFLL entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this handbook. If employees have any questions concerning HFLL leave, they should contact Human Resources.

Eligibility. HFLL leave is available to "HFLL eligible employees." To be an HFLL eligible employee, an employee must:

1) Have been employed by the Company for at least six (6) consecutive months; and
2) Be employed by an employer with one hundred (100) or more employees in Hawaii for each working day of twenty (20) or more calendar weeks in the current or preceding calendar year.

Basic Family and Medical Leave Entitlement. HFLL provides eligible employees up to four (4) workweeks of unpaid leave per calendar year for certain family reasons. Leave under the HFLL is determined on a calendar year basis. The total leave will not

exceed four (4) weeks in any calendar year. It is the Company's policy to provide the greater leave benefit provided under the FMLA or HFLL and to run leave concurrently under the FMLA and HFLL whenever possible.

HFLL leave may be taken: (i) upon the birth of a child of the employee or the adoption of a child; or (ii) to care for the employee's spouse (or reciprocal beneficiary), son or daughter (child can be over the age of 18), parent (or parent-in-law or stepparent), sibling, grandparent or grandparent-in-law, or grandchild who has a serious health condition.

Definition of Serious Health Condition. For purposes of HFLL, a "serious health condition" is a physical or mental condition that warrants participation of the employee to provide care during the period of treatment or supervision by a health care provider and either involves inpatient care in a hospital, hospice, or residential health care facility; or requires continuing treatment or continuing supervision by a health care provider.

Use of Leave. HFLL leave usually will be taken for a period of consecutive days, weeks, or months. However, employees also are entitled to take HFLL leave intermittently (in separate blocks of time) or on a reduced leave schedule (reducing the usual number of hours the employee works each workday) when medically necessary due to a serious health condition of a covered family member or for the birth or adoption of a child.

Substitution of Paid Leave for Unpaid Leave. An employer may not require the use of paid time off during HFLL leave.

Return to Work. As with FMLA leave, at the end of HFLL, employees generally have the right to return to the same or an equivalent position with equivalent pay, benefits, and other terms. There is no key employee exception under the HFLL.

Updated 1.1.23

ILLINOIS SUPPLEMENT

About This Illinois Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Illinois employees will receive the Company's national handbook ("Handbook") and the Illinois Supplement to the Handbook ("Illinois Supplement") (together, the "Employee Handbook").

The Illinois Supplement, however, applies only to Illinois employees. It is intended as a resource containing specific provisions derived under Illinois law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Illinois Supplement are different from or more generous than those in the l Handbook, the policies in the Illinois Supplement will apply.

The Illinois Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Pregnancy Accommodation

In compliance with Illinois law, the Company will not discriminate against an employee because of pregnancy, will engage in a timely, good faith, and meaningful exchange with employees affected by pregnancy, childbirth, or medical or common conditions related to the pregnancy or childbirth, and will endeavor to provide a reasonable accommodation unless doing so will impose an undue hardship on the ordinary operation of the Company's business.

Such accommodations include modifications or adjustments to the work environment or circumstances under which the employee's position is customarily performed, including but not limited to more frequent or longer bathroom, water intake, or rest breaks; private non-bathroom space for expressing breast milk and breastfeeding; seating accommodations or acquisition or modification of equipment; assistance with manual labor, light duty, or a temporary transfer to a less strenuous or non-hazardous position; job restructuring or a part-time or modified work schedule; appropriate adjustment or modifications of examinations or training materials; assignment to a vacant position; or providing leave to recover from childbirth or pregnancy.

The Company will not require an employee to accept an accommodation that the employee did not request or to which the employee did not agree, nor will the Company force an employee to take leave if another reasonable accommodation is available.

The Company may require certification from the employee's health care provider concerning the employee's need for a reasonable accommodation to the same extent such a certification is required for other conditions related to a disability, to the extent permitted by applicable law. Where require, a certification should include: (1) medical justification for the requested accommodation(s); (2) a description of the reasonable accommodation(s) medically advisable; (3) the date the accommodation(s) became advisable; and (4) the probable duration of the reasonable accommodation(s).

The Company will not deny employment opportunities or take adverse employment action against employees if such decision is based on the employer's need to make a reasonable accommodation, and the Company will not retaliate against an employee who requests an accommodation or otherwise exercises the employee's rights under the Illinois Human Rights Act.

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

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

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

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

Anti-Harassment Supplement (Addendum to Sexual and Other Unlawful Harassment Policy)

In compliance with the Illinois Human Rights Act ("Act") and the City of Chicago Human Rights Ordinance ("Ordinance"), all employees have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act or Ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge. Sexual harassment is illegal in Chicago and the Company expressly prohibits such actions and behavior.

"Sexual harassment" means any (i) unwelcome sexual advances or unwelcome conduct of a sexual nature; (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an

individual's employment; or (2) submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Employees can confidentially report allegations of sexual harassment internally using the reporting procedures set forth in the general Sexual and Other Unlawful Harassment Policy,

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

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

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

Illinois Department of Human Rights ("IDHR")

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

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

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

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

Illinois Paid Leave

Eligibility. The Company provides paid leave to employees who work in Illinois pursuant to the Illinois Paid Leave for All Workers Act (the "Act"). This policy does not apply to employees who work in Chicago or employees who work in Cook County for the Company for at least 80 hours within a 120-day period except for employees working in areas of Cook County that have "opted-out" of complying with the Cook County Earned Sick Leave

Ordinance. For covered employees who work in Illinois who are eligible for paid leave under a general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin to accrue paid leave pursuant to this policy on January 1, 2024, or at the start of employment, whichever is later. Employees accrue paid leave at a rate of one (1) hour for every forty (40) hours worked, up to a maximum accrual of forty (40) hours each year. Exempt employees shall be deemed to work forty (40) hours in each workweek unless their regular workweek is less than 40 hours, in which case paid leave accrues based on that regular workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. An employee may begin to use accrued paid leave 90 days following commencement of the employee's employment or on March 31, 2024, whichever is later. Paid leave may be used in the smallest increment of time tracked by the Company's payroll system. An employee may not use more than forty (40) hours of accrued paid leave in any year.

An employee may use paid leave for any reason. An employee is not required to provide an employer a reason for the leave. An employee may choose whether to use paid leave provided under this policy prior to using any other leave provided by the employer or under state law.

An employee's use of paid leave will not be conditioned upon searching for or finding a replacement worker to cover the hours during which the employee takes paid leave.

Notice and Documentation. Employees must make requests to use paid leave orally or in writing to their supervisor. If use of paid leave is foreseeable, the employee must provide 7 calendar days' notice before the date the leave is to begin. If use of paid leave is not foreseeable, the employee must provide such notice as soon as is practicable after the employee is aware of the necessity of the leave.

An employee will not be required to provide documentation or certification as proof or in support of the leave.

Payment. Employees will receive payment for paid leave at their hourly rate of pay at the time the employee uses the paid leave, unless otherwise required by applicable law, and no less than the applicable minimum wage. Use of paid leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to eighty (80) hours of accrued, unused paid leave under this policy to the following year. Accrued but unused paid leave under this policy will not be paid at separation.

Enforcement & Retaliation. The Company will not threaten to take or take any adverse action against an employee because the employee exercises rights or attempts to exercise rights under this policy or the Act, opposes practices which the employee believes to be in violation of the Act, or supports the exercise of rights of another under the Act. Additionally, during any period an employee takes leave under the Act, the Company will maintain coverage for the employee and any family member under any group health plan for the duration of such leave at no less than the level and conditions of coverage that would have been provided if the employee had not taken the leave. Nonetheless, the employee is still responsible for paying the employee's share of the cost of the health care coverage, if any.

Chicago Earned Sick Leave

Eligibility. The Company provides earned sick leave to covered employees who work for the Company in Chicago for at least 80 hours within a 120-day period. To the extent employees covered under this policy are eligible for paid leave under a general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance

Accrual. Employees begin accruing paid leave and paid sick leave pursuant to this policy on July 1, 2024, or the first day of employment, whichever occurs later. Employees accrue one (1) hour of paid leave and one (1) hour of paid sick leave for every thirty-five (35) hours worked, up to a maximum accrual of forty (40) hours of paid leave and forty (40) hours of paid sick leave per benefit year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case earned sick leave accrues based upon their normal workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin to use paid leave on the 90th calendar day after the state of employment. Employees may begin to use earned paid sick leave 180 on the 30th calendar days after the start of employment.

Paid leave may be used for any reason..

Paid sick leave may be used when:

1) The employee is ill or injured, or for the purpose of receiving professional care, including preventative care, diagnosis, or treatment, for medical, mental, or behavioral issues, including substance abuse disorders;
2) A family member is ill, injured, or ordered to quarantine, or to care for a family member receiving professional care, including preventative care, diagnosis, or treatment, for medical, mental, or behavioral issues, including substance abuse disorders;
3) A family member needs personal care including:
    a. to ensure the family member's basic medical, hygiene, nutritional, or safety

needs are met;
   b. to provide transportation to medical appointments if the family member is unable to meet those needs for themselves; or
   c. to be physically present to provide emotional support for a family member with a serious health condition who is receiving inpatient or home care;
4) The employee or a family member is the victim of domestic violence, sexual violence, stalking, other sex offense or trafficking in persons;
5) The employee's place of business is closed by order of a public official due to a public health emergency, or the employee needs to care for a family member whose school, class or place of care has been closed; or
6) The employee obeys an order issued by the Mayor of Chicago, the Governor of Illinois, the Chicago Department of Public Health, or a treating healthcare provider, requiring the employee to:
   a. Stay at home to minimize the transmission of a communicable disease;
   b. Remain at home while experiencing symptoms or sick with a communicable disease;
   c. Obey a quarantine order issued to the employee; or
   d. Obey an isolation order issued to the employee.

For purposes of this policy, "family member" means child, legal guardian, or ward, spouse or domestic partner, parent, spouse or domestic partner's parent, sibling, grandparent, grandchild, or any other individual related by blood or whose close association with the employee is the equivalent of a family relationship. Adoptive, "step," foster, legal guardianship, and in loco parentis relationships are all included within this definition.

An employee's use of paid leave and paid sick leave will not be conditioned upon searching for or finding a replacement worker.

Notice & Documentation. When the use of paid sick leave is reasonably foreseeable (e.g., pre-scheduled health care appointments or court dates in a domestic violence case), the employee is required to provide up to seven (7) days' notice before leave is taken to their supervisor. When the use of paid sick leave is not reasonably foreseeable, the employee is required to provide notice to their supervisor as soon as is practicable on the day the employee intends to take earned sick leave.

For earned sick leave absences of more than three (3) consecutive work days, the Company may require reasonable documentation that the paid sick leave was used for a reason covered under this policy. For example, for reason numbers 1 and 2 above, an employee can provide documentation signed by a licensed health care provider. For reason number 4 above, an employee can provide a police report; a court document; a signed statement from an attorney, clergy member, or victim services advocate; or any other reasonable documentary evidence, including a written statement from the employee or any other person who has knowledge of the circumstances. Documentation need not explain the nature of the employee's or a family member's health condition or the details of the domestic violence, sexual violence, stalking, other sex offense or trafficking in persons.

Payment. Paid leave and paid sick leave will be paid at the same rate and with the same benefits the employee earns from the employee's employment at the time the employee uses such leave, unless otherwise required by applicable law, and no less than the applicable minimum wage. Use of earned paid leave and paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Employees may carry over up to sixteen (16) hours of paid leave and eighty (80) hours of paid sick leave to the following benefit year. Unused paid sick leave will not be paid at separation. Unused paid leave will be paid upon separation or when the employee is no longer working in Chicago due to transfer, if required by applicable law. Additionally, employees that have not been offered a work assignment for 60 days may request payout of their accrued, unused paid leave time.

Interaction with FMLA. When employees use earned sick leave while on FMLA, the notice and documentation/certification requirements under the FMLA, and any other applicable provisions of the FMLA, take precedence to the extent they conflict with a provision of this policy.

Enforcement & Retaliation. The Company prohibits retaliation against employees for requesting or using earned sick leave or for filing a claim with the Chicago Department of Business Affairs and Consumer Protection. Employees who believe that their legal rights have been violated are encouraged to contact Human Resources.

For additional information on this policy, please contact Human Resources.

Cook County Paid Leave

Eligibility. The Company provides paid leave to covered employees who work for the Company in Cook County. This policy does not apply to employees working in Chicago or areas of Cook County that have "opted-out" of complying with the Cook County Earned Sick Leave Ordinance. To the extent employees ***covered under this policy*** are eligible for paid leave under a general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin to accrue paid leave pursuant to this policy on December 31, 2023, or at the start of employment, whichever is later. Employees accrue paid leave at a rate of one (1) hour for every forty (40) hours worked, up to a maximum accrual of forty (40) hours each year. Exempt employees shall be deemed to work forty (40) hours in each workweek unless their regular workweek is less than 40 hours, in which case paid leave accrues based on that regular workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. An employee may begin to use accrued paid leave 90 days following commencement of the employee's employment or on March 30, 2024, whichever is later. Paid leave may be used in a minimum increment of two (2) hours, except if an employee's scheduled workday is less than 2 hours, the employee's scheduled workday will be used to determine the amount of paid leave. An employee may not use more than forty (40) hours of accrued paid leave in any year.

An employee may use paid leave for any reason. An employee is not required to provide an employer a reason for the leave. An employee may choose whether to use paid leave provided under this policy prior to using any other leave provided by the employer or under state law.

An employee's use of paid leave will not be conditioned upon searching for or finding a replacement worker to cover the hours during which the employee takes paid leave.

Notice and Documentation. Employees must make requests to use paid leave orally or in writing to their supervisor. If use of paid leave is foreseeable, the employee must provide 7 calendar days' notice before the date the leave is to begin. If use of paid leave is not foreseeable, the employee must provide such notice as soon as is practicable after the employee is aware of the necessity of the leave.

An employee will not be required to provide documentation or certification as proof or in support of the leave.

Payment. Employees will receive payment for paid leave at their hourly rate of pay at the time the employee uses the paid leave, unless otherwise required by applicable law, and no less than the applicable minimum wage. Use of paid leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over accrued, unused paid leave under this policy to the following year. Accrued but unused paid leave under this policy will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliation against employees for requesting or using paid leave or for filing a claim with the Cook County Commission on Human Rights. Employees who believe that their legal rights have been violated are encouraged to contact Human Resources. Employees may make a complaint with the Cook County Commission on Human Rights in person (69 W. Washington, 30th Floor, Chicago, IL 60602), by email (human.rights@cookcountyil.gov), or by telephone (312-603-1100).

For additional information on this policy, please contact Human Resources.

Updated 7.1.24

MAINE SUPPLEMENT

About This Maine Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Maine employees will receive the Company's national handbook ("Handbook") and the Maine Supplement to the Handbook ("Maine Supplement") (together, the "Employee Handbook").

The Maine Supplement applies only to Maine employees. It is intended as a resource containing specific provisions derived under Maine law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Maine Supplement are different from or more generous than those in the Handbook, the policies in the Maine Supplement will apply.

The Maine Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Sexual Harassment (Addendum to Sexual and Other Unlawful Harassment Policy)

While employees are encouraged to report claims internally, if an employee believes that the employee has been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below. Using the Company's complaint process does not prohibit an employee from filing a complaint with this agency:

Maine Human Rights Commission

51 State House Station

Augusta, ME 04333-0051

PHONE: 207-624-6050
TTY/TTD: 207-624-6064
FAX: 207-624-6063

Employees may file a complaint with the Maine Human Rights Commission within 300 days of the date of alleged sexual harassment.

Maine Paid Leave

Eligibility. The Company provides paid leave to employees who work in Maine. For employees who work in Maine who are eligible for paid leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin to accrue paid leave pursuant to this policy at the start of employment. Employees accrue paid leave at a rate of one (1) hour for every forty (40) hours worked, up to a maximum accrual of forty (40) hours each year, inclusive of any hours carried over from the prior year. Exempt employees are assumed to work forty (40) hours in each workweek unless there is an actual record of time worked, in which case paid leave accrues based upon actual time worked. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Accrued paid leave may be used once an employee has been employed for 120 calendar days. Paid leave may be used in one-hour increments. An employee may not use more than forty (40) hours of accrued paid leave in any year.

An employee may use paid leave for any reason.

The Company may require that leave be used if the employee takes a planned absence, or if the employee is out due to an emergency, illness, or sudden necessity. However, the Company will not require an employee to use paid leave when the Company tells the employee not to work, such as a furlough day.

Notice and Documentation. Absent an emergency, illness or other sudden necessity for taking paid leave, an employee should give four weeks' notice to their manager/supervisor of the employee's intent to use paid leave. Use of paid leave for reasons other than an emergency, illness or other sudden necessity must be scheduled to prevent undue hardship on the Company as reasonably determined by the Company. Employees are required to notify their manager/supervisor as soon as practicable if the use of paid leave is for an emergency, illness, or sudden necessity.

The Company may require a general description regarding the request for use of paid leave, i.e. illness of a child; illness of a day-care provider; transportation issue. For paid leave of more than three (3) consecutive workdays, the Company may require a medical note or other reasonable documentation.

Payment. Employees will receive payment for paid leave at the same base rate of pay at which the employee receives immediately prior to taking paid leave and will receive the same benefits as those provided under established policies of the Company pertaining to other types of paid leave. Use of paid leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused paid leave under this policy to the following year. If an employee carries over unused paid leave from the prior year, the employee will be eligible to earn only enough hours of paid leave in the following year to bring the employee to the forty (40) hour maximum, regardless of how much paid leave the employee used in the previous year and when it is used. Accrued but unused paid leave under this policy will not be paid at separation.

Enforcement & Retaliation. The Company will not retaliate against an employee for requesting or using paid leave for which the employee is eligible. Additionally, the taking of paid leave will not result in the loss of any employee benefits accrued before the date on which the leave commenced and will not affect the employee's right to health insurance benefits on the same terms and conditions as applicable to similarly situated employees.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Family and Medical Leave (Addendum to FMLA Policy)

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

Eligibility. MFMLA leave is available to "MFMLA eligible employees." To be an MFMLA eligible employee, an employee must:

1) Have been employed by a Company for at least twelve (12) consecutive months; and
2) Be employed by an employer that employs fifteen (15) or more employees at a single site in Maine.

Basic Family and Medical Leave Entitlement. The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. The MFMLA provides eligible employees up to ten (10) workweeks of unpaid leave for certain family reason during a 24-month period.

The 24-month MFMLA period and/or 12-month FMLA period is determined based on a rolling period measured backwards from the date the employee's leave will be taken. The total leave will not exceed twelve (12) weeks in any 12-month period (FMLA) or ten (10) weeks in any 24-month period (MFMLA), except for leave to care for an injured Servicemember, which will not exceed twenty-six (26) weeks of leave during a single 12-month period. It is the Company's policy to provide the greater leave benefit provided under the FMLA or MFMLA and to run leave under concurrently under the FMLA and MFMLA whenever possible.

In addition to the entitlements outlined in the FMLA policy, leave under the MFMLA may be taken for any one, or for a combination, of the following reasons:

1) To care for the employee's domestic partner's child after birth or placement for adoption*;*
2) To care for the employee's domestic partner, domestic partner's child, grandchild, domestic partner's grandchild or sibling with a serious health condition;
3) To donate an organ for human organ transplant; or
4) If the employee's spouse, domestic partner, parent, sibling, or child, who is a member of state military forces or the United States Armed Forces (including the National Guard and Reserves), dies or incurs a serious health condition while on active duty.

Unlike the FMLA, MFMLA does not cover leave for certain qualifying exigencies or to care for the employee's child after placement for foster care.

Leave Because of the Birth or Placement of a Child. Unlike FMLA, under MFMLA, there is no requirement that leave because of the birth of a child or placement of a child with the employee for adoption must be concluded within the 12-month period beginning on the date of birth or placement.

Protection of Group Health Insurance and Other Benefits. If an employee is only taking MFMLA leave, the continuation requirements for group health plans under the FMLA are not applicable to group health plans covered under ERISA. Therefore, an employee who is on MFMLA only leave likely will trigger COBRA requirements due to a reduction in hours worked.

Restoration of Employment and Benefits. As with FMLA leave, at the end of MFMLA leave, subject to some exceptions, employees generally have the right to return to the same or equivalent position with equivalent pay, benefits and other terms. There is no key employee exception under the MFMLA.

Reviewed 1.1.24

MARYLAND SUPPLEMENT

About This Maryland Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Maryland employees will receive the Company's national handbook ("Handbook") and the Maryland Supplement to the Handbook ("Maryland Supplement") (together, the "Employee Handbook").

The Maryland Supplement, however, applies only to Maryland employees. It is intended as a resource containing specific provisions derived under Maryland law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Maryland Supplement are different from, or more generous than those in the Handbook, the policies in the Maryland Supplement will apply.

The Maryland Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship**. Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Reasonable Accommodation for Pregnant Employees

In compliance with Maryland law, if a pregnant employee requests an accommodation for a disability caused or contributed to by pregnancy, the Company will explore reasonable accommodations with the pregnant employee, and it will endeavor to provide a reasonable accommodation unless doing so would impose an undue hardship on the Company. Such accommodations may include changing the employee's job duties; changing the employee's work hours; relocating the employee's work area; providing mechanical or electrical aids; transferring the employee to a less strenuous or less hazardous position; or providing leave.

The Company may require certification from the employee's health care provider concerning the medical advisability of a reasonable accommodation to the same extent a certification is required for other temporary disabilities. A certification should include: (1) the date the reasonable accommodation became medically advisable; (2) the probable duration of the reasonable accommodation; and (3) an explanatory statement as to the medical advisability of the reasonable accommodation.

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

Baltimore Lactation Accommodation Policy

In accordance with the Baltimore City Lactation Accommodations in the Workplace Ordinance ("Ordinance"), employees have a legal right to request a lactation accommodation.

Reasonable Time to Express Milk at Work. The Company will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk, to the extent required and in accordance with applicable law. The break time, if possible, must run concurrently with rest and meal periods already provided to the employee. If the break time cannot run concurrently with rest and meal periods already provided to the employee, the break time will be unpaid, to the extent permitted by applicable law.
The Company will provide employees with the use of a room or location within close proximity to the employee's work area, as defined by applicable law, other than a bathroom or closet for the employee to express milk in private. This location may be the employee's private office, if applicable.

Lactation Accommodation Request Process. Those who wish to request such an accommodation may submit a request to Human Resources. The Company will respond to this request within five (5) business days, and engage in an interactive process with the employee to determine lactation break periods and a lactation location appropriate for the employee. To the extent permitted by applicable, the Company may not be able to provide lactation breaks or a lactation location if doing so would impose an undue hardship on the Company. If the Company is unable to provide lactation breaks or a lactation location, or provides a lactation location that does not fully comply with the Ordinance or the Company asserts any waiver or variance granted pursuant to the Ordinance, the Company will, in response to any request for a lactation accommodation, provide a written response specifying the reasons why the Company cannot provide a lactation breaks or a lactation location.

Retaliation against an employee for exercising their right under the Ordinance is prohibited. An employee who believes their rights under the Ordinance have been violated may file a complaint with Human Resources or with the Baltimore Community Relations Commission.

Employees can contact Human Resources with questions regarding this policy.

Maryland Earned Sick and Safe Leave

Eligibility. The Company provides paid earned sick and safe leave (ESSL) to eligible employees who regularly work at least twelve (12) hours per week in Maryland pursuant to the Maryland Healthy Working Families Act (the "Act"). For employees who work in Maryland who are eligible for sick and safe leave under the general paid time off policy or other paid sick leave law/ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy or other paid sick leave law/ordinance.

Accrual. Employees begin to accrue ESSL pursuant to this policy at the start of employment. Employees accrue ESSL at a rate of one (1) hour for every thirty (30) hours worked, up to a maximum accrual of forty (40) hours of paid ESSL per calendar year, and sixty-four (64) hours of paid ESSL at any time. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case ESSL accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using ESSL under this policy after the one hundred and sixth (106th) calendar day of employment. Employees may use ESSL in the smallest increment that the Company's payroll system uses to account for absences or work time, and no employee will be required to take ESSL in an increment of more than four (4) hours. An employee may not use more than sixty- four (64) hours of accrued ESSL per calendar year.

An employee may use ESSL under this policy for the following reasons:

1) To care for or treat the employee's mental or physical illness, injury, or condition or obtain preventive medical care;
2) To care for a family member with a mental or physical illness, injury, or condition, or obtain preventive medical care for a family member;
3) For maternity or paternity leave; or
4) If the absence from work is due to domestic violence, sexual assault, or stalking committed against the employee or the employee's family member and the leave is used either during the time that the employee has temporarily relocated due to domestic violence, sexual assault, or stalking or to obtain (for the employee or the employee's family):
    a) medical or mental health attention that is related to the domestic violence, sexual assault, or stalking;
    b) services from a victim services organization related to the domestic violence sexual assault or stalking; or
    c) legal services or proceedings related to the domestic violence sexual assault or stalking.

For purposes of this policy, family member means (1) a biological, adopted, foster, or step child of the employee; a child for whom the employee has legal or physical custody or guardianship; or a child for whom the employee stands in loco parentis, regardless of child's age; (2) a biological, adoptive, foster, or step parent of the employee or the employee's spouse; legal guardian of the employee; or an individual who acted as a parent or stood in loco parentis to the employee or the employee's spouse when the employee or the employee's spouse was a minor; (3) spouse of the employee; (4) a biological, adoptive, foster, or step grandparent of the employee; (5) a biological, adoptive, foster, or step grandchild of the employee; or (6) a biological, adopted, foster, or step sibling of the employee.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available ESSL for absences for reasons set forth above and employees will be paid for such absences to the extent they have ESSL available.

Notice & Documentation. To use ESSL, an employee must request leave from their supervisor as soon as practicable after determining the need for leave and provide notification of the anticipated duration of the leave. When requesting ESSL that is foreseeable, employees must provide advance notice of seven (7) days before the date the ESSL will begin to their supervisor/manager. When requesting ESSL that is not foreseeable, employees must provide notice as soon as practicable to their supervisor. Failure to provide such notice may result in denial of the employee's request for ESSL if the absence will cause a disruption to the Company.

The Company may require an employee to provide verification that the leave was used in accordance with applicable law when the employee uses ESSL:

- For more than two (2) consecutive scheduled shifts; or
- Between the first one hundred and seven (107) and one hundred and twenty (120) calendar days of employment and the employee agreed to provide verification at the time of hire.

If an employee fails to provide such verification, the Company may deny any subsequent request from the employee to take ESSL for the same reason.

An employee's use of ESSL will not be conditioned upon searching for or finding a replacement worker.

Payment. ESSL under this policy will be calculated based on the employee's wage rate at the time of absence. Use of ESSL is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused ESSL under this policy. Accrued but unused ESSL under this policy will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliatory or adverse action against any employee who exercises their rights under the Act. However, an employee is prohibited from filing a complaint, bringing an action, or testifying in an action alleging violations of the Act in bad faith. If so, they may be subject to criminal penalties and fines. Employees have the right to file a complaint with the Commissioner of Labor and Industry (1100 North Eutaw Street, Room 607 | Baltimore, MD 21201; ssl.assistance@maryland.gov), or bring a civil action to enforce an order against the Company if their rights are restrained under the Act.

Montgomery County Earned Sick and Safe Leave (For Employees also Covered Under the Maryland Healthy Working Families Act)

Eligibility. The Company provides paid earned sick and safe leave (ESSL) to eligible employees who regularly work at least eight (8) hours per week in Montgomery County pursuant to the Montgomery County Earned Sick and Safe Leave Law and the Maryland Healthy Working Families Act (the "Act"). For employees who work in Montgomery County who are eligible for sick and safe leave under the general paid time off policy or other paid sick leave law/ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time policy or other paid sick leave law/ordinance.

Accrual. Employees begin to accrue ESSL pursuant to this policy at the start of employment. Employees accrue ESSL at a rate of 1 hour for every 30 hours worked, up to a maximum accrual of 56 hours of paid ESSL per calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case ESSL accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using ESSL under this policy after the 90th day of employment. Employees may use ESSL in the smallest increment that the Company's payroll system uses to account for absences or work time, and no employee will be required to take ESSL in an increment of more than four (4) hours. An employee may not use more than 80 hours of accrued ESSL per calendar year.

An employee may use ESSL under this policy for the following reasons:

1) To care for or treat the employee's mental or physical illness, injury, or condition or obtain preventive medical care;
2) To care for a family member with a mental or physical illness, injury, or condition, or obtain preventive medical care for a family member;
3) If the employer's place of business has closed by order of a public official due to a public health emergency;
4) If the school or child care center for the employee's family member is closed by order of a public official due to a public health emergency;
5) To care for a family member if a health official or health care provider has determined that the family member's presence in the community would jeopardize the health of others because of the family member's exposure to a communicable disease; or
6) If the absence from work is due to domestic violence, sexual assault, or stalking committed against the employee or the employee's family member and the leave is used either during the time that the employee has temporarily relocated due to domestic violence, sexual assault, or stalking or to obtain (for the employee or the employee's family):
    a) medical or mental health attention related to the domestic violence, sexual assault, or stalking;

b) services from a victim services organization related to the domestic violence sexual assault or stalking; or
c) legal services, including preparing for or participating in a civil or criminal proceeding related to the domestic violence sexual assault or stalking;

7) For the birth of a child, or for the placement of a child with an employee for adoption or foster care; or
8) To care for a newborn, newly adopted, or newly placed child within one year of birth, adoption, or placement.

For purposes of this policy, family member means (1) a biological, adopted, foster, or step child of the employee; a child for whom the employee has legal or physical custody or guardianship; a child for whom the employee stands in loco parentis, regardless of the child's age; or a child for whom the employee is the primary caregiver; (2) a biological, adoptive, foster, or step parent of the employee or the employee's spouse; legal guardian of the employee; or an individual who acted as a parent, stood in loco parentis, or served as the primary caregiver of the employee or employee's spouse when the employee or employee's spouse was a minor; (3) spouse of the employee; (4) a biological, adoptive, foster, or step grandparent of the employee or spouse of the grandparent; (5) a biological, adoptive, foster, or step grandchild of the employee; or (6) a biological, adopted, step, or foster sibling of the employee, or the spouse of a biological, adopted, or foster sibling of the employee.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available earned sick and safe leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have earned sick and safe leave available.

Notice & Documentation. To use ESSL, an employee must request leave from the Company as soon as practicable after determining the need for leave and provide notification of the anticipated duration of the leave. When requesting ESSL that is foreseeable, employees generally must provide advance notice to their supervisor/manager at least five (5) days prior to the absence. When requesting ESSL that is not foreseeable, employees must provide notice to their supervisor/manager within two (2) hours of their scheduled start time or as soon as practicable under the circumstances.

The Company may require an employee who uses more than three (3) consecutive days of ESSL to provide reasonable document to verify that the leave was used in accordance with this policy.

An employee's use of ESSL will not be conditioned upon searching for or finding a replacement worker.

Payment. ESSL under this policy will be calculated based on the employee's base pay rate at the time of absence, unless otherwise required by applicable law, which in no event will be less than minimum wage. Use of ESSL is not considered hours worked for

purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to 56 hours of accrued, unused ESSL under this policy. Accrued but unused ESSL under this policy will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliation against any employee who asserts their rights to receive ESSL. Employees also have the right to file a complaint with the Director of the Montgomery County Office of Human Rights for a violation of any rights granted by the Montgomery County Earned Sick and Safe Leave Law. Employees also have the right to file a complaint with the Maryland Commissioner of Labor and Industry (1100 North Eutaw Street, Room 607 | Baltimore, MD 21201; ssl.assistance@maryland.gov), or bring a civil action to enforce an order against the Company if their rights are restrained under the Act. However, an employee is prohibited from filing a complaint, bringing an action, or testifying in an action alleging violations of the Act in bad faith. If so, they may be subject to criminal penalties and fines.

Questions regarding this policy may be directed to Human Resources.

Updated 1.1.24

MASSACHUSETTS SUPPLEMENT

About This Massachusetts Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Massachusetts employees will receive the Company's national handbook ("Handbook") and the Massachusetts Supplement to the Handbook ("Massachusetts Supplement") (together, the "Employee Handbook").

The Massachusetts Supplement applies only to Massachusetts employees. It is intended as a resource containing specific provisions derived under Massachusetts law that apply to the employee's employment. It should be read together with the National Handbook and, to the extent that the policies in the Massachusetts Supplement are different from, or more generous than those in the Handbook, the policies in the Massachusetts Supplement will apply.

The Massachusetts Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Massachusetts Pregnant Workers Fairness Act (MPWFA)

Pursuant to Massachusetts Pregnant Workers Fairness Act (the "Act"), employees have the right to be free from discrimination in relation to pregnancy or a condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child, including the right to reasonable accommodations for conditions related to pregnancy.

The Company will provide a reasonable accommodation for an employee's pregnancy or any condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child if the employee requests such an accommodation; provided, however, to the extent permitted by applicable law, the Company may deny such an accommodation if the accommodation would impose an undue hardship on the Company's program, enterprise or business. "Reasonable accommodations", may include, but are not be limited to: (i) more frequent or longer paid or unpaid breaks; (ii) time off to attend to a pregnancy complication or recover from childbirth with or without pay; (iii) acquisition or modification of equipment or seating; (iv) temporary transfer to a less strenuous or hazardous position; (v) job restructuring; (vi) light duty; (vii) private non-bathroom space for expressing breast milk; (viii) assistance

with manual labor; or (ix) a modified work schedule; provided, however, that the Company is not required to discharge or transfer an employee with more seniority or promote an employee who is not able to perform the essential functions of the job with or without a reasonable accommodation.

The Company may require that documentation about the need for a reasonable accommodation come from an appropriate health care or rehabilitation professional; provided, however, that the Company will not require documentation from an appropriate health care or rehabilitation professional for the following accommodations: (i) more frequent restroom, food or water breaks; (ii) seating; (iii) limits on lifting more than 20 pounds; and (iv) private non-bathroom space for expressing breast milk. The Company also may require documentation for an extension of the accommodation beyond the originally agreed to accommodation.

The Company will not:

- take adverse action against an employee who requests or uses a reasonable accommodation in terms, conditions or privileges of employment including, but not limited to, failing to reinstate the employee to the original employment status or to an equivalent position with equivalent pay and accumulated seniority, retirement, fringe benefits and other applicable service credits when the need for a reasonable accommodation ceases;

- deny an employment opportunity to an employee if the denial is based on the need of the Company to make a reasonable accommodation to the known conditions related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child;

- require an employee affected by pregnancy, or require said employee affected by a condition related to the pregnancy, including, but not limited to, lactation or the need to express breast milk for a nursing child, to accept an accommodation that the employee chooses not to accept, if that accommodation is unnecessary to enable the employee to perform the essential functions of the job;

- require an employee to take a leave if another reasonable accommodation may be provided for the known conditions related to the employee's pregnancy, including, but not limited to, lactation or the need to express breast milk for a nursing child, without undue hardship on the Company's program, enterprise or business;

- refuse to hire a person who is pregnant because of the pregnancy or because of a condition related to the person's pregnancy, including, but not limited to, lactation or the need to express breast milk for a nursing child; provided, however, that the person is capable of performing the essential functions of the position with a reasonable accommodation and that reasonable accommodation would not impose an undue hardship, demonstrated by the Company, on the Company's program, enterprise or business.

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

Sexual Harassment (Addendum to Sexual and Other Unlawful Harassment Policy)

The Company is committed to providing a work environment free of harassment. The Company complies with Massachusetts law and maintains a strict policy prohibiting sexual harassment and harassment against employees or applicants for employment based on race, color, religious creed, sex (including pregnancy, childbirth and related medical conditions), gender identity, sexual orientation, national origin or ancestry, physical or mental disability, age (40 and over), military status, certain criminal records, genetic information or testing, HIV testing, a personal admission to a facility for the care and treatment of a mentally ill person and taking of parental leave. The Company will not tolerate discrimination or harassment based upon these characteristics or any other characteristic protected by applicable federal, state or local law.

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below.

The name, address, and telephone numbers of the state and federal enforcing agencies for our Massachusetts-based employees are as follows:

Massachusetts Commission Against Discrimination (MCAD)

One Ashburton Place
Room 601
Boston, MA 02108
(617) 994-6000

Denholm Building
484 Main Street, Room 320
Worcester, MA 01608
(508) 453-9630

436 Dwight Street
Room 220
Springfield, MA 01103
(413) 739-2145

(Federal) Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building
15 New Sudbury Street, Room 475
Boston, MA 02203
(800) 669-4000 or (800) 669-6820 TTY
info@eeoc.gov

Massachusetts Earned Paid Sick Time

Eligibility. The Company provides earned sick time to employees whose primary place of work is in Massachusetts. For employees whose primary place of work is in Massachusetts and are eligible for sick time under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing earned sick time at the start of employment. Eligible employees will accrue one (1) hour of earned sick time for every thirty (30) hours worked, up to a maximum accrual of forty (40) hours each calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case sick time accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued earned sick time on the 90th day of employment. Employees may use earned sick time in the smallest increment the Company's payroll system uses to account for absences or use of other time. An employee may not use more than forty (40) hours of earned sick time in any calendar year.

Employees may use earned sick time for the following reasons:

1) to care for the employee's child (which includes a biological, adopted, or foster child, stepchild, legal ward, or child of a person standing in loco parentis), spouse (as defined by the marriage laws of the commonwealth, which includes a partner in a same-sex marriage), parent, or parent of a spouse, who is suffering from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
2) to care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
3) to attend the employee's routine medical appointment or a routine medical appointment for the employee's child, spouse, parent, or parent of a spouse;
4) for travel to and from an appointment, a pharmacy, or other location related to the purpose for which earned sick time was taken; or
5) to address the psychological, physical or legal effects of domestic violence.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available earned sick time for absences for reasons set forth above and employees will be paid for such absences to the extent they have earned sick time available.

Earned sick time may not be used as an excuse to be late for work if the lateness is not related to one of the reasons described above. Additionally, employees may not accept a specific shift assignment with the intention of calling out sick for all or part of the shift.

Use of earned sick time may run concurrently with time off provided under the FMLA, the Massachusetts Parental Leave Act, the Massachusetts Domestic Violence Leave Act, the Massachusetts Small Necessities Leave Act, or time off pursuant to any other applicable law, if applicable, and to the extent permitted by applicable law.

Notice and Documentation. Employees must comply with the Company's attendance and call-in policy when providing notice. Employees must make a good faith effort to provide notice of this need to use earned sick time if the need is foreseeable. Specifically, if an employee's need for the use of earned sick time is due to a pre-scheduled or foreseeable absence, seven (7) days advance notice to their manager/supervisor is required. If an employee anticipates a multi-day absence from work, employees must provide notification of the expected duration of the leave, or, if unknown, must provide notification on a daily basis, unless the circumstances make such notice unreasonable. If an employee's need for the use of earned sick time is unforeseeable, notice must be provided as soon as is practicable under the circumstances.

When providing notice or reporting an absence for a covered purpose, employees are not required to explicitly reference earned sick time, but the Company may, in accordance with applicable laws regarding privacy and confidentiality of medical information, review with employees the covered purposes for which earned sick time may be used.

For any earned sick time used, employees must verify in writing that they have used the time for a covered reason, but will not be required to explain the nature of the illness or the details of the domestic violence.

The Company will also require supporting documentation if an employee's use of earned sick time:

1) covers more than twenty-four (24) consecutively scheduled work hours or three (3) consecutive scheduled work days;
2) occurs within two (2) weeks prior to an employee's final scheduled day of work before termination of employment, except in the case of temporary employees;
3) occurs after four (4) unforeseeable and undocumented absences within a three (3) month period *for all other employees*.

Documentation signed by a health care provider indicating the need for earned sick time taken constitutes acceptable certification for sick time taken for reasons 1 through 4 set forth in the Usage section above, except employees who do not have health care covered through a private insurer, the MA Healthcare Connector and related insurers may provide a signed, written statement evidencing the need for the use of the earned sick time, without being required to explain the nature of the illness, in lieu of documentation by a health care provider. Acceptable documentation for earned sick time taken for reason 5 can include: (1) a restraining order or other documentation of equitable relief issued by a

court of competent jurisdiction; (2) a police record documenting the abuse; (3) documentation that the perpetrator of the abuse has been convicted of one or more offenses where the victim was a family or household member; (4) medical documentation of the abuse; (5) a statement provided by a counselor, social worker, health worker, member of the clergy, shelter worker, legal advocate or other professional who has assisted the individual in addressing the effects of the abuse on the individual or the individual's family; or (6) a sworn statement from the individual attesting to the abuse. The Company will not require that the documentation explain the nature of the illness or the details of the domestic violence. Documentation can be submitted in person or by another reasonable method, including email.

Documentation must be provided within seven (7) days of an employee taking earned sick time, unless, for good cause shown or as otherwise permitted by the Company, an employee requires more time to provide such documentation. Failure to comply with the Company's reasonable documentation requirements, without a reasonable justification, may result in the Company recouping the amount paid for earned sick time from future pay, as an overpayment, or otherwise taking appropriate action, to the extent permitted by applicable law.

The Company may require employees to provide a fitness-for-duty certification, a work release, or other documentation from a medical provider before returning to work after an absence during which earned sick time was used.

Payment. Earned sick time will be paid at the same hourly rate as the employee earns from the employee's employment at the time the employee uses such time, unless otherwise required by applicable law. Use of sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Up to forty (40) hours of accrued, unused earned sick time under this policy can be carried over to the following calendar year, but employees are subject to an accrual cap of forty (40) hours. Once the accrual cap is reached, earned sick time will stop accruing until some earned sick time is used, at which point accrual will resume, subject to the maximum annual accrual of forty (40) hours and the accrual cap of forty (40) hours. Accrued but unused earned sick time under this policy will not be paid at separation.

Enforcement & Retaliation. Employees may be subject to disciplinary action for misuse of earned sick time if they are engaging in fraud or abuse of benefits available under this policy.

The Company will not tolerate retaliation against an employee who opposes practices that the employee believes to be in violation of the earned sick time law or because the employee supports the exercise of rights of another employee under the earned sick time law.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Massachusetts Paid Family and Medical Leave ("PFMLA")

Eligibility Requirements

All employees working in Massachusetts are eligible for paid family and medical leave under the Massachusetts Paid Family and Medical Leave Act ("PFMLA"), provided they are eligible for unemployment compensation in Massachusetts and receive wages from a Massachusetts employer. Former employees may also be eligible for paid benefits, to the extent they have been separated from the Company for not more than 26 weeks at the start of their leave and have not found subsequent employment at the time their leave begins.

Entitlement

Eligible employees may take up to twenty-six (26) weeks of job-protected PFMLA leave for certain family and medical reasons during the course of a benefit year. The benefit year is calculated prospectively looking at the 52-week period beginning on the Sunday *immediately preceding* the first day of job-protected leave for the employee. PFMLA leave may be taken for any one, or for a combination, of the following reasons:

- *Up to* twelve (12) weeks of family leave: (i) to bond with a child during the first 12 months after the child's birth, adoption, or foster care placement; (ii) for a qualifying exigency arising out of the fact that a family member is on active duty or has been notified of an impending call to active duty in the Armed Forces; or (iii) to care for a covered-family member, who has a serious health condition.
- *Up to* twenty-six (26) weeks of family leave to care for a family member who is a covered service member with a serious health condition.
- *Up to* twenty (20) weeks of medical leave for their own serious health condition that makes them unable to perform one or more of the essential functions of their job.

A **covered-family member** includes the employee's spouse, domestic partner, child, parent, parent of a spouse or domestic partner, a person who stood in loco parentis when the employee was a minor child, grandchild, grandparent, or sibling.

A **serious health condition** is an illness, injury, impairment or physical or mental condition that involves: (i) inpatient care in a hospital, hospice or residential medical facility; or (ii) continuing treatment by a health care provider.

Qualifying exigencies may include caring for a military member's child or other family member of the military member on covered active duty, making financial or legal arrangements for the military member, attending counseling, attending military events or ceremonies, spending time with the military member during a rest and recuperation leave or following return from deployment or making arrangements following the death of the military member.

A covered servicemember is either: (a) a member of the Armed Forces, including a member of the National Guard or Reserves, who is: undergoing medical treatment, recuperation or therapy; otherwise in outpatient status; or is otherwise on the temporary

disability retired list for a serious injury or illness that was incurred by the member in the line of duty on active duty in the Armed Forces, or a serious injury or illness that existed before the beginning of the member's active duty and was aggravated by service in the line of duty on active duty in the Armed Forces; or (b) a former member of the Armed Forces, including a former member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy for a serious injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces, or a serious injury or illness that existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces and manifested before or after the member was discharged or released from service.

Leave and benefits are administered by the Massachusetts Department of Family and Medical Leave (the "Department"). Although the Company provides wage income verification to the Department, all benefits determinations are made exclusively by the Department. The Department calculates weekly benefits as follows: (i) the portion of an employee's average weekly wage that is equal to or less than 50% of the state average weekly wage shall be replaced at a rate of 80%; and (ii) the portion of an employee's average weekly wage that is more than 50% of the state average weekly wage shall be replaced at a rate of 50%, up to the applicable weekly benefit limits.

The first seven (7) calendar days of leave are unpaid by the Department, except for family leave following a medical leave for pregnancy or childbirth, in which case the seven-day waiting period for the family leave will be waived. During any unpaid waiting period, employees may elect to use [earned sick time (provided the need for leave is covered under the earned sick time policy), PTO/vacation, other paid time off] time to replace their regular income. Typically, employees will start receiving benefits from the Department not less than fourteen (14) days after the Department approves the leave and receipt of benefits, unless the Department approves benefits more than fourteen (14) days before the onset of eligibility to take leave.

Supplementation of Department Benefits with Company Benefits

Employees may supplement the Department's benefits with accrued paid time off or paid sick leave (assuming the reason for taking PFMLA leave is covered under the paid time off policy or sick leave policy/law/ordinance), provided the total amount of PFMLA benefits from the Department and paid time off does not exceed the employee's regular income. Receipt of such benefits does not extend PFMLA leave entitlements, which will run concurrently with any Company-provided benefits.

Use of Leave

PFMLA leave is usually taken for a period of consecutive days, weeks or months. However, employees also are entitled to take PFMLA leave intermittently or on a reduced leave schedule when medically necessary due to a serious health condition of the employee or family member. Qualifying exigency leave also may be taken on an intermittent basis. Intermittent leave may be taken in increments of one hour. Please note that the Department will not pay PFMLA benefits in increments of less than 15 minutes. In addition, the Department only permits employees to apply for payment of benefits associated with intermittent leave once they have eight (8) hours of accumulated

leave time, except where more than 30 calendar days has lapsed since the employee initially took such leave.

The employee is required to work with the Company to create an agreed-upon intermittent or reduced leave schedule. Failure to comply with the agreed-upon schedule may result in discipline.

The use of intermittent leave will result in the proportional reduction of an employee's available allotment of leave. For example, if an employee normally works 40 hours per week and takes intermittent leave for 20 hours each week, then it will be counted as ½ a week of leave to be counted against the employee's leave entitlement.

Employee Notice to the Company

To trigger PFMLA leave protections, employees must inform the Human Resources Benefits Team of the need for leave and the anticipated timing and duration of the leave, if known. The employee notice must state:

- the anticipated start date of the leave,
- the anticipated length of the leave, and
- the individual's expected return date.

Employees must provide the Company at least 30 days' advance notice of the need to take PFMLA leave when the need is foreseeable. Such notice must be provided before employees apply to the Department. When 30 days' notice is not possible, or the approximate timing of the need for leave is not foreseeable, employees must provide the Company notice of the need for leave as soon as practicable.

When planning medical treatment, the employee must consult with the Company and make a reasonable effort to schedule treatment so as not to unduly disrupt the Company's operations. The employee must consult with the Company prior to the scheduling of treatment to work out a treatment schedule which best suits the needs of both the Company and the employee.

The Department may deny or delay leave and benefits for employees who fail to give the Company at least 30 days' notice for foreseeable leave without a reasonable excuse for the delay, who apply to the Department before notifying their employer, or who otherwise fail to satisfy PFMLA notice obligations.

Employee Application to the Department

After providing notice to the Company (unless the need for leave is unforeseeable), employees should apply directly to the Department for leave and benefits. Employees are required to use the forms provided by the Department and their application for benefits may not be processed unless the application for benefits includes *all* information necessary for the Department's review and processing. The Department requires the following information:

- Identifying information, such as Social Security Number or Individual Taxpayer Identification Number;

- The nature of the leave, whether family leave or medical leave;
- The starting date and expected duration of the leave;
- Whether the leave will be continuous or intermittent;
- The employer's name and identification number;
- Evidence that notice was provided to the employer in advance of the application for benefits, including the date notice was provided to the employer;
- Any denied, granted, or pending requests for leave for a qualifying reason from the employer during the last 12 months;
- An attestation regarding the family relationship in the form specified by the Department if the leave involves an application for family leave benefits; and
- A completed certification based on the type of leave in the form specific by the Department.

Employees may be required to provide additional specific information requested by the Department where reasonably necessary to review and process an application for benefits including, but not limited to, whether the employee will be receiving any other wage replacement. It is the employee's responsibility to provide the Department with timely, complete and sufficient information, certifications or other documents supporting the need for leave.

Amendment or Extension of Leave Period and Paid Leave Benefits

If there is a change in relevant circumstances that would justify an extension, reduction, or other modification of the period of leave, the employee and Company must notify the Department within seven calendar days of said change using the forms required by the Department. For extensions, specifically, the employee must make a request for extension at least fourteen (14) calendar days prior to the expiration of the original approved leave. The Department may consider late filed requests upon a showing of good cause by the employee. The request for extension must include:

- the reason for the extension;
- the requested duration of the extended leave;
- the date on which the covered individual provided notice for the request for extension to the employer; and
- a newly completed or updated health care certification supporting the need for leave.

Job Benefits & Protection

During PFMLA leave, the Company will maintain health coverage under any employment-related health insurance on the same terms and conditions as if the employee had continued to work. If Company-provided benefits are used as a substitute to the Department's benefits, the Company will deduct the employee's portion of any applicable health plan premium as a regular payroll deduction. If the employee is not receiving any Company-benefits during the leave, the employee must make arrangements with Human Resources – Benefits Team prior to taking leave to pay their portion of any applicable health insurance premiums each month.

Unless otherwise provided by applicable law, an employee returning from PFMLA leave will be restored to their previous or equivalent position with equivalent status, pay, benefits, length-of-service credit and seniority as of the date of the leave.

Return to Work/Fitness for Duty Medical Certifications

Unless notified otherwise, employees returning to work from PFMLA leaves taken for their own serious health conditions must provide the Company with a medical certification confirming they are able to return to work and to perform the essential functions of their positions, with or without reasonable accommodation. The Company may delay and/or deny job restoration until employees provide return to work/fitness for duty certifications.

Interaction with Other Leave Policies

Leave taken pursuant to PFMLA will run concurrently with leave taken under other applicable state and federal leave laws, including without limitation the Massachusetts Parental Leave Act and the federal Family and Medical Leave Act of 1993, when the leave is for a qualified reason under those laws.

Right to an Appeal

An employee who is denied leave pursuant to the PFMLA may submit an appeal to the Department. The appeal must be filed within ten (10) calendar days of receipt of the denial. The deadline may be extended by the Department upon a showing of circumstances beyond the employee's control. In addition, the employee is required to provide a complete copy of the request for appeal to the Company. Employees may request a hearing with the Department and a final decision will be issued by the Department affirming, modifying, or revoking the initial determination made by the Company.

An employee aggrieved by the Department's final decision may further appeal by filing a complaint in district court for the county in the Commonwealth where the individual resides or was last employed. The complaint must be filed within thirty (30) calendar days of the date the Department's final decision is received by the individual.

Questions and/or Complaints about PFMLA Leave

If you have questions regarding this PFMLA policy, please contact Human Resources – Benefits Team. For questions about determinations by the Department on leave eligibility, entitlement, and/or benefits, please contact the Department directly. The Company is committed to complying with the PFMLA and, whenever necessary, shall interpret and apply this policy in a manner consistent with the PFMLA.

The PFMLA makes it unlawful for employers to discriminate, retaliate, threaten to retaliate or interfere with the exercise of any rights under the PFMLA. In addition, employers may not retaliate or threaten to retaliate against any person who has filed a complaint, has caused a complaint to be filed, has or will participate or testify in proceeding relating to a violation of the PFMLA, or has given or is about to give information connected to a proceeding relating to a violation of the PFMLA. If employees believe their PFMLA rights have been violated, they should contact Human Resources immediately. The Company will investigate any PFMLA complaints and take prompt and appropriate remedial action

to address and/or remedy any PFMLA violation. Employees also may file PFMLA complaints with the Department alleging PFMLA violations.

Updated 1.1.24

MICHIGAN SUPPLEMENT

About This Michigan Supplement

Creative Circle ("Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Michigan employees will receive the Company's national handbook ("Handbook") and the Michigan Supplement to the Handbook ("Michigan Supplement") (together, the "Employee Handbook").

The Michigan Supplement applies only to Michigan employees. It is intended as a resource containing specific provisions derived under Michigan law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Michigan Supplement are different from, or more generous than those in the Handbook, the policies in the Michigan Supplement will apply.

The Michigan Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Social Security Number Privacy Policy

The Company is dedicated to protecting the personal security and privacy of all employees. In the ordinary course of its business, and for a variety of legitimate business reasons, the Company may collect and store personal information about its employees, including all or any part of an employee's social security number ("SSN"), in hard copy or digital storage. For purposes of this policy, "SSN" means more than four sequential digits of an employee's social security number. Consistent with Michigan law, the Company takes reasonable steps to maintain the confidentiality of social security numbers.

All documents and records containing social security numbers and information are kept in a secure environment. Only authorized personnel with a legitimate business need may access records and documents (both internal and external) that contain an employee's social security number and identification information.

In addition to the Company's policy protecting against the disclosure of confidential information, employees (other than authorized personnel) are prohibited from accessing, viewing or using other employee's social security information maintained by the Company.

When necessary, documents containing employee social security numbers will be properly destroyed through shredding or other means before disposal.

Nothing in this policy is intended to modify employees' rights to access their own personnel files, as permitted by the Company's policies and under Michigan law. Nor does this policy prohibit the use of an employee's SSN where the use is authorized by state or federal statute, rule, regulation, court order, or pursuant to legal discovery or process.

Violations of this policy will result in disciplinary action up to and including termination of employment. Violators may also be subject to civil and criminal penalties authorized by applicable state or federal law.

Preservation of Ability to Assert Claim Under Michigan's Persons with Disabilities Civil Rights Act

Under Michigan's Persons with Disabilities Civil Rights Act, a person with a disability may allege a violation against a person regarding a failure to accommodate only if the person with a disability notifies the person in writing of the need for accommodation within 182 days after the date the person with a disability knew or reasonably should have known that an accommodation was needed. Employees with disabilities needing accommodations must notify Human Resources in writing within 182 days after the employee becomes aware of the need for an accommodation.

Michigan Paid Medical Leave

Eligibility. The Company provides paid medical leave (PML) to eligible non-exempt employees who work in Michigan. For employees who work in Michigan who are eligible for paid medical leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance

Accrual. Employees begin accruing PML pursuant to this policy at the start of employment. Eligible employees will accrue one (1) hour of PML for every thirty-five (35) hours worked, up to a maximum accrual of one (1) hour of PML in a calendar week and forty (40) hours each benefit year. For purposes of this policy, the benefit year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued PML after the 90th calendar day of employment. PML must be used in one (1) hour increments. An employee may not use more than forty (40) hours of PML in any benefit year.

An eligible employee may use PML for the following:

a) The employee's mental or physical illness, injury, or health condition; medical diagnosis, care, or treatment of the employee's mental or physical illness, injury, or health condition; or preventative medical care for the employee;

b) The employee's family member's mental or physical illness, injury, or health condition; medical diagnosis, care, or treatment of the employee's family member's mental or physical illness, injury, or health condition; or preventative medical care for a family member of the employee;
c) If the employee or the employee's family member is a victim of domestic violence or sexual assault, the medical care or psychological or other counseling for physical or psychological injury or disability; to obtain services from a victim services organization; to relocate due to domestic violence or sexual assault; to obtain legal services; or to participate in any civil or criminal proceedings related to or resulting from the domestic violence or sexual assault; or
d) For closure of the employee's primary workplace by order of a public official due to a public health emergency; for an employee's need to care for a child whose school or place of care has been closed by order of a public official due to a public health emergency; or if it has been determined by the health authorities having jurisdiction or by a health care provider that the employee's or employee's family member's presence in the community would jeopardize the health of others because of the employee's or family member's exposure to a communicable disease, whether or not the eligible employee or family member has actually contracted the communicable disease.

For purposed of this policy, family member means: biological, adopted or foster child, stepchild or legal ward, or a child to whom the employee stands in loco parentis; biological parent, foster parent, stepparent, or adoptive parent or a legal guardian of an employee or an employee's spouse or an individual who stood in loco parentis when the employee was a minor child; individual to whom the employee is legally married under the laws of any state; grandparent; grandchild; or a biological, foster, or adopted sibling.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available PML for absences for reasons set forth above and employees will be paid for such absences to the extent they have PML available.

Notice & Documentation. When the need to use paid sick leave under this policy is foreseeable, employees should provide their supervisor with seven (7) days prior notice of the planned use of paid sick leave under this policy. When the need to use paid sick leave under this policy is not foreseeable, the employee must provide notice, preferably in writing, as soon as possible.

For paid sick leave of three (3) or more consecutive days, employees must provide reasonable documentation that such leave is being taken for the purpose permitted under this policy.

An employee who is using PML for reason (c) above may be required to provide documentation that the PML has been used for that purpose. The following types of documentation are satisfactory: (a) police report indicating that the employee or the employee's family member was a victim of domestic violence or sexual assault; (b) signed

statement from a victim and witness advocate affirming that the employee or employee's family member is receiving services from a victim services organization; or a (c) court document indicating that the employee or employee's family member is involved in legal action related to domestic violence or sexual assault. The documentation should not explain the details of the violence or disclose details relating to domestic violence or sexual assault or the details of an employee's or an employee's family member's medical condition.

Payment. PML will be paid at a pay rate equal to the greater of either normal hourly wage or base wage for the employee or the applicable minimum wage. Use of PML is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused PML to the following year. Unused PML under this policy will not be paid at separation.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Reviewed 1.1.24

MINNESOTA SUPPLEMENT

About This Minnesota Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Minnesota employees will receive the Company's national handbook ("National Handbook") and the Minnesota Supplement to the National Handbook ("Minnesota Supplement") (together, the "Employee Handbook").

The Minnesota Supplement applies only to Minnesota employees. It is intended as a resource containing specific provisions under Minnesota law that apply to the employee's employment. It should be read together with the National Handbook and, to the extent that the policies in the Minnesota Supplement are different from or more generous than those in the National Handbook, the policies in the Minnesota Supplement will apply.

The Minnesota Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Nursing Mothers, Lactating Employees, and Pregnancy Accommodations

Minnesota's Nursing Mothers, Lactating Employees, and Pregnancy Accommodations law (Minnesota Statutes § 181.939) gives pregnant and lactating employees certain legal rights.

Pregnant employees have the right to request and receive reasonable accommodations, which may include, but are not limited to, more frequent or longer breaks, seating, limits to heavy lifting, temporary transfer to another position, temporary leave of absence or modification in work schedule or tasks. An employer cannot require an employee to take a leave or accept an accommodation.

Lactating employees have the right to reasonable paid break times to express milk at work unless they are expressing milk during a break that is not usually paid, such as a meal break. Employers should provide a clean, private and secure room that is not a bathroom near the work area that includes access to an electrical outlet for employees to express milk.

It is against the law for an employer to retaliate, or to take negative action, against a pregnant or lactating employee for exercising their rights under this law.

Employees who believe their rights have been violated under this law can contact the Minnesota Department of Labor and Industry's Labor Standards Division at dli.laborstandards@state.mn.us or 651-284-5075 for help. Employees also have the right to file a civil lawsuit for relief. For more information about this law, visit dli.mn.gov/newparents.

Right to Review Personnel Records

Under Minnesota law, employees have the right to review their personnel record once every six (6) months and, if they leave employment with us, they may review it once every year as long as we maintain the personnel record.

Employees who would like to review their personnel record must make a good faith request in writing, and we will provide an opportunity for review of the record or make a copy (at no cost). Employees may also request copies (at no cost) at the time the record is reviewed. We will provide an opportunity for review of personnel records within seven (7) working days of the written request, or if the personnel record is physically located outside of Minnesota, within fourteen (14) working days of the written request.

What is contained in the personnel record is carefully defined under Minnesota law. The law does not require that we allow employees to review and copy information that is not contained in their personnel record. Employees who dispute information contained in their personnel record may submit a request to have it removed from the record. If we do not agree that the information should be removed, a written response to the information of up to five (5) pages may be submitted.

We will not take any action against an employee for appropriately asserting the employee's rights to review the personnel record. If an employee's rights as provided by this law are improperly denied, the law provides certain remedies.

This notice only describes some of employees' rights under the law. For more information, the Minnesota statutes further detailing these rights can be found at Minnesota Statutes § 181.960 through Minnesota Statutes § 181.965. These laws can be found on the internet at http://www.leg.state.mn.us/leg/statutes.asp or in public libraries throughout the state.

Minnesota Sick and Safe Time

Eligibility. The Company provides sick and safe time (SST) to employees who perform work within Minnesota for at least eighty (80) hours in a year. For employees who work in Minnesota who are eligible for sick and safe time under the general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any

specific issue or issues than the general paid time off policy.

Accrual. Employees begin to accrue SST at the start of employment. Employees accrue one (1) hour for every thirty (30) hours worked, up to a maximum annual accrual of forty-eight (48) hours each year. Additionally, an employee's total SST accrual balance may not exceed eighty (80) hours at any time ("overall accrual cap"). Exempt employees will be presumed to work forty (40) hours in each workweek for accrual purposes unless their normal workweek is less than forty (40) hours, in which case accrual will be based on that normal workweek. For purposes of this policy, the year is the 12-month period beginning January 1st and ending on December 31st.

Usage. Employees can begin to use accrued SST immediately. SST may be used in the smallest increment of time tracked by the Company's payroll system.

An employee may use SST for the following reasons:

1) An employee's own mental or physical illness, injury, or health condition to accommodate the employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury, or health condition who needs medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or care for a family member who needs preventive medical care;
3) Absences due to domestic abuse, sexual assault, or stalking of the employee or employee's family member, provided the absence is for medical attention related to physical or psychological injury or disability caused by domestic abuse, sexual assault, or stalking; to obtain services from a victim services organization; to obtain psychological or other counseling; to relocate or take steps to secure an existing home due to domestic abuse, sexual assault, or stalking; or to seek legal advice or take legal action, including preparing for or participating in any civil or criminal proceedings related to or resulting from domestic abuse, sexual assault, or stalking;
4) The closure of the employee's place of business due to weather or other public emergency;
5) To accommodate the employee's need to care for a family member whose school or place of care has been closed due to weather or other public emergency;
6) The employee's inability to work or telework because the employee is: (i) prohibited from working by the employer due to health concerns related to the potential transmission of a communicable illness related to a public emergency; or (ii) seeking or awaiting the results of a diagnostic test for, or a medical diagnosis of, a communicable disease related to a public emergency and such employee has been exposed to a communicable disease or the employee's employer has requested a test or diagnosis; and
7) When it has been determined by the health authorities having jurisdiction or by a health care professional that the presence of the employee or family member of the employee in the community would jeopardize the health of others because of

the exposure of the employee or family member of the employee to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease.

For purposes of this policy, family member means a child (including child-in-law), spouse or registered domestic partner, sibling (including a sibling-in-law), parent, grandchild, grandparent, a child of a sibling, a sibling of the parents of the employee or the employee's spouse of registered domestic partner, any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; or one individual annually designated by the employee. The family members listed above are not limited to biological family members but also include step, foster, adoptive, half relations and those who stand in loco parentis and legal guardians.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available SST for absences for reasons set forth above and employees will be paid for such absences to the extent they have SST available.

Employees will be provided with SST balance and usage information on the employee's pay statement.

Notice and Documentation. When the need to use SST is foreseeable, employees must provide seven (7) days advance notice to their supervisor or manager. When the need to use SST is not foreseeable, employees must provide notice to their supervisor or manager as soon as practicable.

For SST of more than three (3) consecutive workdays, employees may also be required to provide reasonable documentation that SST was taken for a covered reason. For example, for SST used for reasons (1), (2), (6) or (7) above, documentation signed by a licensed health care provider indicating the need for the amount of SST taken and that SST was used for a covered reason under this policy and/or applicable law will be considered reasonable documentation, and such documentation need not specify the nature of the employee's or the employee's family member's injury, illness or condition, except as required by law. Supporting documentation will not be required for the above purposes if it would result in an unreasonable expense on the employee or where the employee did not receive services from a health care professional. In this event reasonable documentation may include a written statement from the employee. For example, for SST used for reason (3) above, documentation signed by an employee or volunteer of a victim services organization, an attorney, a police officer or an antiviolence counselor will be considered reasonable documentation, and such documentation need not specify the details of the domestic abuse, sexual assault or stalking.

Payment. SST is paid at the same hourly rate as employee's rate of pay for the hours the employee was scheduled to work during the time SST is used, unless otherwise required by applicable law. Use of SST is not considered hours worked for purposes of

calculating overtime.

Carryover & Payout. Accrued, unused SST may be carried over to the following year, but as indicated above, there is an overall accrual cap of eighty (80) hours. Once the overall accrual cap is reached, SST will stop accruing until some SST is used. Accrued, unused SST will not be paid upon separation.

Enforcement & Retaliation. Employees may be subject to discipline for using SST for a reason other than the covered reasons above, to the maximum extent permitted by applicable law. Retaliation against employees who request or use earned SST is prohibited. Employees have the right to file a complaint with the Minnesota Department of Labor and Industry or bring a civil action if they believe they have been denied SST, retaliated against, or that their rights to SST has been otherwise interfered with or restrained.

Employees with questions regarding this policy can contact Human Resources.

Bloomington Sick and Safe Time

Eligibility. The Company provides sick and safe time (SST) to employees who perform work within the City of Bloomington for at least eighty (80) hours in a year. For employees who work in Bloomington who are eligible for sick and safe time under the general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy.

Accrual. Employees begin to accrue SST at the start of employment. Employees accrue one (1) hour of SST for every thirty (30) hours worked, up to a maximum annual accrual of forty-eight (48) hours each year. Additionally, an employee's total SST accrual balance may not exceed eighty (80) hours at any time ("overall accrual cap"). Exempt employees will be presumed to work forty (40) hours in each workweek for accrual purposes unless their normal workweek is less than forty (40) hours, in which case accrual will be based on that normal workweek. For purposes of this policy, the year is the 12-month period beginning January 1st and ending on December 31st.

Usage. Employees can begin to use accrued SST immediately. SST may be taken in the smallest increment of time tracked by the Company's payroll system.

An employee may use SST for the following reasons:

1) An employee's own mental or physical illness, injury, or health condition, an employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury, or health condition, care of a family member who needs medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or care for a family member who needs preventive medical care;

3) Absences due to domestic abuse, sexual assault, or stalking of the employee or employee's family member, provided the absence is to seek medical attention related to physical or psychological injury or disability caused by domestic abuse, sexual assault, or stalking; to obtain services from a victim services organization; to obtain psychological or other counseling; to relocate or take steps to secure an existing home due to domestic abuse, sexual assault, or stalking; or to seek legal advice or take legal action, including preparing for or participating in any civil or criminal proceedings related to or resulting from domestic abuse, sexual assault, or stalking;
4) The closure of the employee's place of business due to weather or other public emergency;
5) To accommodate the employee's need to care for a family member whose school or place of care has been closed due to weather or other public emergency;
6) The employee's inability to work or telework because the employee is: (i) prohibited from working by the employer due to health concerns related to the potential transmission of a communicable illness related to a public emergency; or (ii) seeking or awaiting the results of a diagnostic test for, or a medical diagnosis of, a communicable disease related to a public emergency and such employee has been exposed to a communicable disease or the employee's employer has requested a test or diagnosis; and
7) When it has been determined by the health authorities having jurisdiction or by a health care professional that the presence of the employee or family member of the employee in the community would jeopardize the health of others because of the exposure of the employee or family member of the employee to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease.

For purposes of this policy, family member means a child (including child-in-law), spouse or registered domestic partner, sibling (including a sibling-in-law), parent, grandchild, grandparent, a child of a sibling, a sibling of the parents of the employee or the employee's spouse of registered domestic partner, guardian, ward, other member of the employee's household, any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; or one individual annually designated by the employee. The family members listed above are not limited to biological family members but also include step, foster, adoptive, half relations and those who stand in loco parentis and legal guardians.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available SST for absences for reasons set forth above and employees will be paid for such absences to the extent they have SST available.

Notice and Documentation. When the need to use SST is foreseeable, employees must provide seven (7) days advance notice to their supervisor, and when the need to use SST is not foreseeable, employees must provide notice to their supervisor as soon as practicable.

For SST of more than three (3) consecutive work days, employees may also be required to provide reasonable documentation that SST was taken for a covered reason. For example, for SST used for reasons (1), (2), (6) or (7) above, documentation signed by a licensed health care provider indicating the need for the amount of SST taken and that SST was used for a covered reason under this policy and/or applicable law will be considered reasonable documentation, and such documentation need not specify the nature of the employee's or the employee's family member's injury, illness or condition, except as required by law. Supporting documentation will not be required for the above purposes where employee or employee's family member did not receive services from a health care professional or if documentation cannot be obtained from a health care professional in a reasonable time or without added expense. In this event, reasonable documentation may include a written statement from the employee indicating that the employee is using or used earned sick and safe time for a qualifying purpose pursuant to reasons (1), (2), (6) or (7). For example, for SST used for reason (3) above, a court record or documentation signed by an employee or volunteer of a victim services organization, an attorney, a police officer or an antiviolence counselor will be considered reasonable documentation, and such documentation need not specify the details of the domestic abuse, sexual assault or stalking. For example, for SST used for reason (4) above, a written statement from the employee indicating that the employee is using or used earned sick and safe time for a qualifying purpose will be considered reasonable documentation.

Payment. SST is paid at the same hourly rate as employee's regular rate of pay (including shift differentials, if applicable, but not including overtime payments or any special forms of compensation such as lost tips, incentives, commissions, premium payments, or bonuses) for the hours the employee was scheduled to work during the time SST is used, unless otherwise required by applicable law. Use of SST is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued, unused SST may be carried over, but as indicated above, there is an overall accrual cap of eighty (80) hours. Once the overall accrual cap is reached, SST will stop accruing until some SST is used. Accrued, unused SST will not be paid upon separation.

Enforcement & Retaliation. Employees may be subject to discipline for using SST for a reason other than the covered reasons above, to the maximum extent permitted by applicable law. Retaliation against employees who request or use earned SST is prohibited. Employees have the right to file a complaint with the City of Bloomington's City Attorney's Office if they believe they have been denied SST, retaliated against, or that their rights to SST has been otherwise interfered with or restrained. Employees also have the right to file a complaint with the Minnesota Department of Labor and Industry or bring a civil action if they believe they have been denied SST, retaliated against, or that their rights to SST has been otherwise interfered with or restrained.

Employees with questions regarding this policy can contact Human Resources.

Earned Sick and Safe Leave

Notice of Employee Rights

Effective July 1, 2023

CITY OF BLOOMINGTON MINNESOTA

The Earned Sick and Safe Leave (ESSL) Ordinance requires employers with five or more employees to provide PAID sick and safe leave to employees working in Bloomington.

You have a right to sick and safe leave that you can use for the care, treatment or safety of you or a family member.

Who Qualifies?

Employees working in Bloomington for 80+ hours in a year. Employees can be full-time, part-time, temporary, or seasonal.

How is it paid?

If an employer has five or more employees, ESSL must be paid on the same schedule and at the same rate as regular wages.

How do I earn leave time?

ONE hour of ESSL for every 30 hours worked.
Employees can earn up to 48 hours/year.
Unused ESSL carries over to the next year.

Check your pay stub

Employers must list the amount of earned sick and safe leave on your pay check stub.

When and how can leave be used?

Employees can use leave time (a) for medical, physical, mental or health needs, (b) for school or workplace closures, and (c) when they or a family member is a victim of domestic violence, sexual assault, or stalking.

Retaliation against an employee trying to use ESSL is prohibited. An employee can file a complaint against an employer who retaliates against the employee or fails to provide ESSL.
If you believe your right to ESSL has been violated, you can file a complaint at:
Email: ESSL@bloomingtonmn.gov • Website: blm.mn/essl • Call: 952-563-8753
Mail/In-person: City of Bloomington, Legal Department, Compliance Division,
1800 W. Old Shakopee Road, Bloomington, MN 55431

For more information scan the QR below.

Posting required by law in a location where employees can easily see this notice.

Duluth Earned Sick and Safe Time

Eligibility. The Company provides paid earned sick and safe time (ESST) to employees who work within the geographic boundaries of the City of Duluth, MN for more than 50 percent of the employee's working time in a 12-month period or is based in the City of Duluth and spends a substantial part of their time working in the City and does not spend more than 50 percent of their work-time in a 12-month period in any other particular place. For employees who work in the City of Duluth who are eligible for sick and safe time under a general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy, if any.

Accrual. Employees begin accruing ESST pursuant to this policy at the start of employment. Eligible employees will accrue one (1) hour of ESST for every thirty (30) hours worked, up to a maximum accrual of sixty-four (64) hours each year. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued ESST immediately. ESST may be used in the smallest increment of time tracked by the Company's payroll system.

An employee may use ESST for the following reasons:

1) An employee's own mental or physical illness, injury, or health condition to accommodate the employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury, or health condition who needs medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or care for a family member who needs preventive medical care;
3) Absences due to domestic abuse, sexual assault, or stalking of the employee or employee's family member, provided the absence is for medical attention related to physical or psychological injury or disability caused by domestic abuse, sexual assault, or stalking; to obtain services from a victim services organization; to obtain psychological or other counseling; to relocate or take steps to secure an existing home due to domestic abuse, sexual assault, or stalking; or to seek legal advice or take legal action, including preparing for or participating in any civil or criminal proceedings related to or resulting from domestic abuse, sexual assault, or stalking;
4) The closure of the employee's place of business due to weather or other public emergency;
5) To accommodate the employee's need to care for a family member whose school or place of care has been closed due to weather or other public emergency;
6) The employee's inability to work or telework because the employee is: (i) prohibited from working by the employer due to health concerns related to the potential transmission of a communicable illness related to a public emergency; or (ii)

seeking or awaiting the results of a diagnostic test for, or a medical diagnosis of, a communicable disease related to a public emergency and such employee has been exposed to a communicable disease or the employee's employer has requested a test or diagnosis; and

7) when it has been determined by the health authorities having jurisdiction or by a health care professional that the presence of the employee or family member of the employee in the community would jeopardize the health of others because of the exposure of the employee or family member of the employee to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease.

For purposes of this policy, family member means a child (including child-in-law), spouse or registered domestic partner, sibling (including a sibling-in-law), parent, grandchild, grandparent, a child of a sibling, a sibling of the parents of the employee or the employee's spouse of registered domestic partner, any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; or one individual annually designated by the employee. The family members listed above are not limited to biological family members but also include step, foster, adoptive, half relations and those who stand in loco parentis and legal guardians.

An employee's use of ESST will not be conditioned upon searching for or finding a replacement worker.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available ESST for absences for reasons set forth above and employees will be paid for such absences to the extent they have ESST available.

Employees will be provided with ESST balance and usage information on the employee's pay statement.

Notice & Documentation. When the need to use ESST is foreseeable, employees must provide seven (7) days advance notice to their supervisor, and when the need to use ESST is unforeseeable, the employee must provide notice to their supervisor as soon as practicable. In such instances, notice may be provided on behalf of the employee by the employee's spokesperson, e.g., a spouse, coworker, adult family member, or other responsible party. When possible, a request for ESST should include the expected duration of the absence.

The Company may require reasonable documentation that ESST is being taken for covered reason for absences of more than three (3) consecutive scheduled workdays. For example, for SST used for reasons (1), (2), (6) or (7) above, documentation signed by a licensed health care provider indicating the need for the amount of ESST taken and that ESST was used for a covered reason under this policy and/or applicable law will be considered reasonable documentation, and such documentation need not specify the nature of the employee's or the employee's family member's injury, illness or

condition, except as required by law. Supporting documentation will not be required for the above purposes if it would result in an unreasonable expense on the employee or where the employee did not receive services from a health care professional. In this event reasonable documentation may include a written statement from the employee. For example, for ESST used for reason (3) above, documentation signed by an employee or volunteer of a victim services organization, an attorney, a police officer or an antiviolence counselor will be considered reasonable documentation, and such documentation need not specify the details of the domestic abuse, sexual assault or stalking.

Payment. ESST is paid at the same hourly rate as the employee's regular rate of pay for the hours the employee was scheduled to work during the time ESST is used, unless otherwise required by applicable law. Use of ESST is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to eighty (80) hours of accrued, unused ESST to the following year. Unused ESST under this policy will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliation or discrimination against an employee for requesting or using ESST or otherwise exercising or attempting to exercise any right provided in this policy or under applicable Duluth Ordinance or Minnesota law, including participating in or assisting an investigation, proceeding or hearing under the laws. Employees have the right to file a written complaint with the Duluth City Clerk's Office if ESST required by the Duluth Ordinance is denied by the Company or the employee is retaliated against for requesting or taking ESST as provided by the Duluth Ordinance. Employees also have the right to file a complaint with the Minnesota Department of Labor and Industry or bring a civil action if they believe they have been denied ESST, retaliated against, or that their rights to ESST has been otherwise interfered with or restrained.

Questions regarding this policy may be directed to Human Resources.

St. Paul Earned Sick and Safe Time

Eligibility. The Company provides earned sick and safe time (ESST) to eligible employees who perform work within the City of St. Paul for at least eighty (80) hours in a year. For employees who work in St. Paul who are eligible for sick and safe time under a general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy.

Accrual. Employees begin to accrue ESST at the start of employment. Employees accrue one (1) hour of ESST for every thirty (30) hours worked, up to a maximum annual accrual of forty-eight (48) hours each year. Additionally, an employee's total ESST accrual balance may not exceed eighty (80) hours at any time ("overall accrual cap"). Exempt employees will be presumed to work forty (40) hours in each workweek

for accrual purposes unless their normal workweek is less than forty (40) hours, in which case accrual will be based on that normal workweek. For purposes of this policy, the year is the 12-month period beginning January 1st and ending on December 31st.

Usage. Employees can begin to use accrued ESST immediately. ESST may be used in the smallest increment of time tracked by the Company's payroll system.

An employee may use ESST for the following reasons:

1) An employee's own mental or physical illness, injury, or health condition, to accommodate the employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury, or health condition, care of a family member who needs medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or care for a family member who needs preventive medical care;
3) Absences due to domestic violence, sexual assault, or stalking of the employee or employee's family member, provided the absence is for medical attention related to physical or psychological injury or disability caused by domestic abuse, sexual assault, or stalking; to obtain services from a victim services organization; to obtain psychological or other counseling; to relocate or take steps to secure an existing home due to domestic violence, sexual assault, or stalking; or to take legal action, including preparing for or participating in any civil or criminal proceedings related to or resulting from domestic violence, sexual assault, or stalking;
4) The closure of the employee's place of business due to weather or other public emergency;
5) To accommodate the employee's need to care for a family member whose school or place of care has been closed due to weather or other public emergency;
6) The employee's inability to work or telework because the employee is: (i) prohibited from working by the employer due to health concerns related to the potential transmission of a communicable illness related to a public emergency; or (ii) seeking or awaiting the results of a diagnostic test for, or a medical diagnosis of, a communicable disease related to a public emergency and such employee has been exposed to a communicable disease or the employee's employer has requested a test or diagnosis; or
7) When it has been determined by the health authorities having jurisdiction or by a health care professional that the presence of the employee or family member of the employee in the community would jeopardize the health of others because of the exposure of the employee or family member of the employee to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease.

For purposes of this policy, family member means a child (including child-in-law), spouse or registered domestic partner, sibling (including a sibling-in-law), parent, grandchild, grandparent, a child of a sibling, a sibling of the parents of the employee or the employee's spouse of registered domestic partner, guardian, ward, or a person who

currently resides in the employee's home, any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; or one individual annually designated by the employee. The family members listed above are not limited to biological family members but also include step, foster, adoptive, half relations and those who stand in loco parentis and legal guardians.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available ESST for absences for reasons set forth above and employees will be paid for such absences to the extent they have ESST available.

Upon request of an employee, the Company will provide information (in writing or electronically) regarding the employee's (1) accrued and available ESST and (2) used earned sick and safe time.

Notice and Documentation. When the need to use ESST is foreseeable, employees must provide seven (7) days advance notice to their supervisor, and when the need to use ESST is not foreseeable, employees must provide notice to their supervisor as soon as practicable.

For ESST of more than three (3) consecutive workdays, employees may be required to provide reasonable documentation that ESST was taken for a covered reason. For example, for SST used for reasons (1), (6) or (7) above, documentation signed by a licensed health care provider indicating the need for the amount of ESST taken and that ESST was used for a covered reason under this policy and/or applicable law will be considered reasonable documentation, and such documentation need not specify the nature of the employee's or the employee's family member's injury, illness or condition, except as required by law. Supporting documentation will not be required for the above purposes if it would result in an unreasonable expense on the employee or where the employee did not receive services from a health care professional. In this event reasonable documentation may include a written statement from the employee. For example, for ESST used for reason (2) above, documentation signed by an employee or volunteer of a victim services organization, an attorney, a police officer or an antiviolence counselor will be considered reasonable documentation, and such documentation need not specify the details of the domestic abuse, sexual assault or stalking.

Payment. ESST is paid at the same hourly rate as the employee's regular rate of pay for the hours the employee was scheduled to work during the time ESST is used, unless otherwise required by applicable law. Use of ESST is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued, unused ESST may be carried over, but as indicated above, there is an overall accrual cap of eighty (80) hours. Once the overall accrual cap is reached, ESST will stop accruing until some SST is used. Accrued, unused ESST will not be paid upon separation.

Enforcement & Retaliation. Employees may be subject to discipline for using ESST under this policy for purposes other than those provided under this policy, to the maximum extent permitted by applicable law. Retaliation against employees who request or use ESST is prohibited. Employees have the right to file a complaint with the City of St. Paul Department of Human Rights and Equal Employment Opportunity if they believe they have been denied ESST, retaliated against, or that their rights to ESST has been otherwise interfered with or restrained; or may bring a civil action in the event of retaliation. Employees also have the right to file a complaint with the Minnesota Department of Labor and Industry or bring a civil action if they believe they have been denied SST, retaliated against, or that their rights to ESST has been otherwise interfered with or restrained.

Employees with questions regarding this policy can contact Human Resources.

SAINT PAUL
HUMAN RIGHTS & EQUAL ECONOMIC OPPORTUNITY

CITY OF SAINT PAUL
Department of Human Rights & Equal Economic Opportunity
Division of Labor Standards Enforcement and Education

NOTICE TO EMPLOYEES

Minimum Wage and Earned Sick and Safe Time (ESST) ordinances apply to employees performing work within the geographical boundaries of Saint Paul

EARNED SICK AND SAFE TIME

What can you use ESST for?

- For yourself or a family member's mental or physical illness, including preventative medical care
- Reasons related to domestic violence, sexual assault, or stalking
- School or work closure because of exposure to an infectious agent
- Care for a family member whose daycare closed unexpectedly

How do you accrue and use ESST?

- Employees accrue 1 hour of ESST for every 30 hours worked
- ESST begins accruing on the 1st day of work and employees are allowed to use earned ESST after their first 90 days of work (unless their Employer has a more generous ESST policy).
- Employers must allow an employee to accrue at least forty-eight (48) hours of earned sick and safe time every year and roll over unused sick and safe time up to 80 hours after the employee's first year.
- Documentation may be requested for absences of longer than 3 days

Retaliation is Illegal

MINIMUM WAGE INCREASES

The Saint Paul Minimum Wage is updated annually

Business Size	2023 Minimum Wage	2024 Minimum Wage
Macro (10,001+ employees)	**$15.19** Effective January 1	**$15.57** Effective January 1
Large (101-10,000 employees)	**$15.00** Effective July 1	**$15.57** Effective July 1
Small (6-100 employees)	**$13.00** Effective July 1	**$14.00** Effective July 1
Micro (5 or fewer employees)	**$11.50** Effective July 1	**$12.25** Effective July 1

REPORT A VIOLATION

If you believe your right to ESST or Minimum Wage has been violated, you can file a complaint with HREEO using any of these methods:

651-266-8966

LaborStandards@stpaul.gov

stpaul.gov/laborstandards

15 W Kellogg Blvd, Suite 280, Saint Paul, MN 55102

Employees also have a right to bring a civil action if they believe their right to ESST or Minimum Wage has been violated.

Language interpretation, translation, and accommodations are available upon request

Minneapolis Sick and Safe Time

Eligibility. The Company provides sick and safe time (SST) to employees who perform work within the City of Minneapolis for at least eighty (80) hours in a year. For employees who work in Minneapolis who are eligible for sick and safe time under a general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy.

Accrual. Employees begin to accrue SST at the start of employment. Employees accrue one (1) hour for every thirty (30) hours worked, up to a maximum annual accrual of forty-eight (48) hours each year. Additionally, an employee's total SST accrual balance may not exceed eighty (80) hours at any time ("overall accrual cap"). Exempt employees will be presumed to work forty (40) hours in each workweek for accrual purposes unless their normal workweek is less than forty (40) hours, in which case accrual will be based on that normal workweek. For purposes of this policy, the year is the 12-month period beginning January 1st and ending on December 31st.

Usage. Employees can begin to use accrued SST immediately. SST may be used in the smallest increment of time tracked by the Company's payroll system.

An employee may use SST for the following reasons:

1) An employee's own mental or physical illness, injury, or health condition to accommodate the employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury, or health condition who needs medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition or care for a family member who needs preventive medical care;
3) Absences due to domestic violence, sexual assault, or stalking of the employee or employee's family member, provided the absence is for medical attention related to physical or psychological injury or disability caused by domestic abuse, sexual assault, or stalking; to obtain services from a victim services organization; to obtain psychological or other counseling; to relocate or take steps to secure an existing home due to domestic violence, sexual assault, or stalking; or to take legal action, including preparing for or participating in any civil or criminal proceedings related to or resulting from domestic violence, sexual assault, or stalking;
4) The closure of the employee's place of business due to weather or other public emergency or by order of a public official to limit exposure to an infectious agent, biological toxin or hazardous material, or other public health emergency;
5) To accommodate the employee's need to care for a family member whose school or place of care has been closed due to weather or other public emergency or by order of a public official to limit exposure to an infectious agent, biological toxin or hazardous material or other public health emergency;
6) To accommodate the employee's need to care for a family member whose school or place of care has been closed due to inclement weather; loss of power, heating,

or water; other public emergency or other unexpected closure;

7) The employee's inability to work or telework because the employee is: (i) prohibited from working by the employer due to health concerns related to the potential transmission of a communicable illness related to a public emergency; or (ii) seeking or awaiting the results of a diagnostic test for, or a medical diagnosis of, a communicable disease related to a public emergency and such employee has been exposed to a communicable disease or the employee's employer has requested a test or diagnosis; or
8) When it has been determined by the health authorities having jurisdiction or by a health care professional that the presence of the employee or family member of the employee in the community would jeopardize the health of others because of the exposure of the employee or family member of the employee to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease.

For purposes of this policy, family member means a child (including child-in-law), spouse or registered domestic partner, sibling (including a sibling-in-law), parent, grandchild, grandparent, a child of a sibling, a sibling of the parents of the employee or the employee's spouse of registered domestic partner, guardian, ward, or a person who currently resides in the employee's home, any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; or one individual annually designated by the employee. The family members listed above are not limited to biological family members but also include step, foster, adoptive, half relations and those who stand in loco parentis and legal guardians.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available SST for absences for reasons set forth above and employees will be paid for such absences to the extent they have SST available.

Upon request of an employee, the Company will provide information (in writing or electronically) regarding the employee's accrued and available SST and used SST.

Notice and Documentation. When the need to use SST is foreseeable, employees must provide seven (7) days advance notice to their supervisor. When the need to use SST is not foreseeable, employees must provide notice to their supervisor as soon as practicable.

For SST of more than three (3) consecutive work days, employees may also be required to provide reasonable documentation that SST was taken for a covered reason. For example, for SST used for reasons (1), (2), (7) or (8) above, documentation signed by a licensed health care provider indicating the need for the amount of SST taken and that SST was used for a covered reason under this policy and/or applicable law will be considered reasonable documentation, and such documentation need not specify the nature of the employee's or the employee's family member's injury, illness or condition, except as required by law. Supporting documentation will not be required for

the above purposes if it would result in an unreasonable expense on the employee or where the employee did not receive services from a health care professional. In this event reasonable documentation may include a written statement from the employee. For example, for SST used for reason (3) above, documentation signed by an employee or volunteer of a victim services organization, an attorney, a police officer or an antiviolence counselor will be considered reasonable documentation, and such documentation need not specify the details of the domestic abuse, sexual assault or stalking.

Payment. SST is paid at the same hourly rate as employee's regular rate of pay (including shift differentials, if applicable, but not including overtime payments or any special forms of compensation such as lost tips, incentives, commissions, premium payments, or bonuses) for the hours the employee was scheduled to work during the time SST is used, unless otherwise required by applicable law. Use of SST is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Accrued, unused SST may be carried over, but as indicated above, there is an overall accrual cap of eighty (80) hours. Once the overall accrual cap is reached, SST will stop accruing until some SST is used. Accrued, unused SST will not be paid upon separation.

Enforcement & Retaliation. Employees may be subject to discipline for using SST for a reason other than the covered reasons above, to the maximum extent permitted by applicable law. Retaliation against employees who request or use earned SST is prohibited. Employees have the right to file a complaint with the City of Minneapolis Labor Standards Enforcement Division if they believe they have been denied SST, retaliated against, or that their rights to SST has been otherwise interfered with or restrained. Employees also have the right to file a complaint with the Minnesota Department of Labor and Industry or bring a civil action if they believe they have been denied SST, retaliated against, or that their rights to SST has been otherwise interfered with or restrained.

Employees with questions regarding this policy can contact Human Resources.

Wage Disclosure Protections

Under the Minnesota Wage Disclosure Protection law, you have the right to tell any person the amount of your own wages. Your employer cannot retaliate against you for disclosing your own wages. Your remedies under the Wage Disclosure Protection law are to bring a civil action against your employer and/or file a complaint with the Minnesota Department of Labor and Industry.

Pregnancy & Parental Leave (Addendum to FMLA Policy)

Like the Family and Medical Leave Act (“FMLA”) Policy described elsewhere in this handbook, the Minnesota Parental Leave Act, as amended (“MPLA”), may require

employers to provide family and medical leaves of absence for eligible employees. Either or both of these laws may apply to a leave. Where both laws apply, any leave taken will be counted under both laws at the same time. This policy will be interpreted to comply with the law(s) that apply to a particular leave. This policy provides employees information concerning any MPLA entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this handbook. Questions regarding this policy may be directed to Human Resources – Benefits Team.

Eligibility. All employees are eligible for leave under the MPLA.

Basic Family and Medical Leave Entitlement. The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. The MPLA provides eligible employees with up to twelve (12) weeks of unpaid leave (i) for the birth or placement for adoption of a child (but not foster care placement) or (ii) if a female employee, for prenatal care, or incapacity due to pregnancy, childbirth, or related health conditions. Leave for the birth or adoption of a child may begin within twelve (12) months after the birth or adoption, except where the child must remain in the hospital longer than the mother, the leave may not begin more than twelve (12) months after the child leaves the hospital.

Protection of Group Health Insurance. During any period of leave pursuant to the MPLA, employees may continue any health insurance coverage but employees may be required to pay the full cost of coverage.

Restoration of Employment and Benefits. As with FMLA leave, at the end of MPLA leave, subject to some exceptions, employees generally have the right to return to the same or equivalent position with equivalent pay, benefits and other terms. There is no key employee exception under the MPLA.

Updated 1.1.24

NEVADA SUPPLEMENT

About This Nevada Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Nevada employees will receive the Company's national handbook ("National Handbook") and the Nevada Supplement to the National Handbook ("Nevada Supplement") (together, the "Employee Handbook").

The Nevada Supplement applies only to Nevada employees. It is intended as a resource containing specific provisions under Nevada law that apply to the employee's employment. It should be read together with the National Handbook and, to the extent that the policies in the Nevada Supplement are different from or more generous than those in the National Handbook, the policies in the Nevada Supplement will apply.

The Nevada Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Nevada Pregnant Workers' Fairness Act

Pursuant to Nevada Revised Statute § 613.335 and sections 2 to 8, inclusive, of the Nevada Pregnant Workers' Fairness Act (the "Act"), employees have the right to be free from discriminatory or unlawful employment practices based on pregnancy, childbirth, or a related medical condition.

Under the Act, the Company may not:

- Deny a reasonable accommodation to birthing employees and applicants, upon request, for a condition related to pregnancy, childbirth, or a related medical condition, unless an accommodation would impose an undue hardship on the business of the Company.
- Take adverse employment actions against a birthing employee or applicant based on a need for a reasonable accommodation.
- Deny an employment opportunity to a qualified birthing employee or applicant based on a need for a reasonable accommodation.
- Require a birthing employee or applicant to accept an accommodation that the employee or applicant did not request or chooses not to accept or to take leave

from employment if an accommodation is unavailable (except for construction employees whose primary duties involve performing manual labor).

Under the Act, the Company may:

- Require a birthing employee to submit written medical certification from the employee's physician substantiating the need for an accommodation because of pregnancy, childbirth, or related medical conditions, and the specific accommodation recommended by the physician.

Under the Act, the Company and the employee must:

- Engage in a timely, good faith interactive process to determine an effective, reasonable accommodation, subject to the terms of the policy and law stated above.

Examples of potential reasonable accommodations include, but are not limited to:

- Modifying equipment or providing different seating
- Revising break schedules (e.g., frequency and duration of breaks)
- Providing space reasonable space for expressing breast milk
- Providing assistance with manual labor that is NOT part of the primary work duties
- Light duty work assignment
- Transfer temporarily to a less strenuous or hazardous position
- Restructuring a position (but NOT creating a new position that would not be created for other employees with medical limitations)
- Modifying a work schedule.

For further information regarding the Act, contact the Nevada Equal Rights Commission.

Equal Rights Commission
Las Vegas
1820 East Sahara Avenue
Suite 314
Las Vegas, NV 89104
Phone (702) 486-7161

Equal Rights Commission
Northern Nevada
1325 Corporate Blvd.
Room 115
Reno, NV 89502
Phone (775) 823-6690

Nevada Paid Leave

Eligibility. If the Company has more than 50 employees in Nevada, then the Company provides paid leave to Nevada employees other than temporary, seasonal and on-call employees. For employees who work in Nevada who are eligible for paid leave under the general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy.

Accrual. Employees begin to accrue paid leave pursuant to this policy at the start of employment. Employees accrue paid leave at a rate of 0.01923 hours for each hour of work performed. For purposes of this policy, the year is the 365-day period beginning

January 1st and ending on December 31st.

Usage. Accrued paid leave may be used beginning on the 90th calendar day of employment. Paid leave may be used in a minimum increment of four hours. An employee may not use more than forty (40) hours of accrued paid leave in a year.

An employee may use paid leave for any reason.

An employee's use of paid leave will not be conditioned upon searching for or finding a replacement worker.

Notice and Documentation. Employees must provide notice of the need for the leave to their manager or supervisor as soon as practicable. Employees are not required to provide a reason for use of leave.

Payment. Employees will receive payment for paid leave at the same rate of pay at which the employee is compensated at the time such leave is taken, unless otherwise required by applicable law, on the same payday as the hours taken are normally paid. Use of paid leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused paid leave under this policy to the following year. Accrued but unused paid leave under this policy will not be paid at separation.

Enforcement & Retaliation. The Company will not retaliate against an employee for requesting or using paid leave for which the employee is eligible.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Reviewed 1.1.24

NEW JERSEY SUPPLEMENT

About This New Jersey Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, New Jersey employees will receive the Company's national handbook ("Handbook") and the New Jersey Supplement to the Handbook ("New Jersey Supplement") (together, the "Employee Handbook").

The New Jersey Supplement applies only to New Jersey employees. It is intended as a resource containing specific provisions derived under New Jersey law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the New Jersey Supplement are different from or more generous than those in the Handbook, the policies in the New Jersey Supplement will apply.

The New Jersey Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

New Jersey Earned Sick Leave

Eligibility. The Company provides paid earned sick leave (ESL) to employees who work in New Jersey. For employees who work in New Jersey who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing ESL pursuant to this policy at the start of employment. Eligible employees will accrue one (1) hour of ESL for every thirty (30) hours worked, up to a maximum accrual of forty (40) hours each benefit year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case ESL accrues based upon that normal workweek. For purposes of this policy, the benefit year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued ESL on the 120th calendar day of employment. ESL may be used in quarter hour increments. An employee may not use

more than forty (40) hours of ESL in any benefit year.

Employees may use ESL for the following reasons:

(1) Diagnosis, care, or treatment of, or recovery from, an employee's mental or physical illness, injury or other adverse health condition, or for preventive medical care for the employee;

(2) Diagnosis, care, or treatment of, or recovery from, a family member's mental or physical illness, injury or other adverse health condition, or for preventive medical care for the family member;

(3) Circumstances resulting from the employee, or a family member of the employee, being a victim of domestic or sexual violence, if the leave is to allow the employee to obtain for the employee or the family member:
   a. Medical attention needed to recover from physical or psychological injury or disability caused by domestic or sexual violence;
   b. Services from a designated domestic violence agency or other victim services organization;
   c. Psychological or other counseling;
   d. Relocation; or
   e. Legal services, including obtaining a restraining order or preparing for, or participating in, any civil or criminal legal proceeding related to the domestic or sexual violence.

(4) Time during which the employee is not able to work because of:
   a. a closure of the employee's workplace, or the school or place of care of a child of the employee by order of a public official or because of a state of emergency declared by the Governor, due to an epidemic or other public health emergency;
   b. the declaration of a state of emergency by the Governor, or the issuance by a health care provider or the Commissioner of Health or other public health authority of a determination that the presence in the community of the employee, or a member of the employee's family in need of care by the employee, would jeopardize the health of others;
   c. during a state of emergency declared by the Governor, or upon the recommendation, direction, or order of a healthcare provider or the Commissioner of Health or other authorized public official, the employee undergoes isolation or quarantine, or cares for a family member in quarantine, as a result of suspected exposure to a communicable disease and a finding by the provider or authority that the presence in the community of the employee or family member would jeopardize the health of others; or

(5) Time needed by the employee in connection with a child of the employee to attend a school-related conference, meeting, function or other event requested or required by a school administrator, teacher, or other professional staff member responsible for the child's education, or to attend a meeting regarding care provided to the child in connection with the child's health conditions or disability.

For purposes of this policy, a family member includes a child, grandchild, sibling, spouse, domestic partner, civil union partner, parent, or grandparent of an employee, or

a spouse, domestic partner, or civil union partner of a parent or grandparent of the employee, or a sibling of a spouse, domestic partner, or civil union partner of the employee, or any other individual related by blood to the employee or whose close association with the employee is the equivalent of a family relationship.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available ESL for absences for reasons set forth above and employees will be paid for such absences to the extent they have ESL available.

Notice and Documentation. If an employee's need to use ESL is foreseeable, employees must provide seven (7) calendar days advance notice, prior to the date the leave is to begin, of the intention to use the leave and its expected duration. If the reason for the leave is not foreseeable, employees must give notice of the intention to use ESL as soon as practicable. The Company may prohibit employees from using foreseeable ESL on certain dates, or require reasonable documentation if ESL that is not foreseeable is used during such dates.

The Company will require reasonable documentation if the employee uses ESL for three (3) or more consecutive work days. If ESL is taken for reasons (1) or (2) above, documentation signed by a health care professional who is treating the employee or the family member of the employee indicating the need for the leave and, if possible, number of days of leave, will be considered reasonable documentation. If ESL is taken for reason (3) above, any of the following shall be considered reasonable documentation of the domestic or sexual violence: medical documentation; a law enforcement agency record or report; a court order; documentation that the perpetrator of the domestic or sexual violence has been convicted of a domestic or sexual violence offense; certification from a certified Domestic Violence Specialist or a representative of a designated domestic violence agency or other victim services organization; or other documentation or certification provided by a social worker, counselor, member of the clergy, shelter worker, health care professional, attorney, or other professional who has assisted the employee or family member in dealing with the domestic or sexual violence. If ESL is taken for reason (4) above, a copy of the order of the public official or the determination by the health authority shall be considered reasonable documentation. If ESL is taken for reason (5) above, tangible proof of the school-related conference, meeting, function, or other event requested or required by a school administrator, teacher, or other professional staff member responsible for the education of the employee's child; or tangible proof of the meeting regarding care provided to the child of the employee in connection with the child's health conditions or disability shall be considered reasonable documentation.

An employee's use of ESL will not be conditioned upon searching for or finding a replacement worker.

Payment. ESL will be paid at the same rate of pay with the same benefits as the employee normally earns, but no less than the state minimum wage. Use of ESL will not

be counted as hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused ESL under this policy to the following benefit year. Accrued but unused ESL under this policy will not be paid at separation.

Enforcement & Retaliation. Employees have the right to request and use ESL and may file a complaint for alleged violations of their rights with the New Jersey Department of Labor and Workforce Development. The Company prohibits retaliation or the threat of retaliation against an employee for exercising or attempting to exercise any right provided in this policy or under applicable law.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Family Leave Insurance Benefits

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

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

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

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

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

Leave for Domestic/Sexual Violence

The New Jersey Security and Financial Empowerment Act ("NJ SAFE Act"), provides that certain employees are eligible to receive an unpaid leave of absence, for a period not to exceed twenty (20) days in a 12-month period, to address circumstances resulting from domestic violence or a sexually violent offense. To be eligible, the employee must have worked at least 1,000 hours during the immediately preceding 12-month period. Further, the employee must have worked for an employer in New Jersey that employs twenty-five (25) or more employees for each working day during each of twenty (20) or more calendar workweeks in the then-current or immediately preceding calendar year.

Leave under the NJ SAFE Act may be taken by an employee who is a victim of domestic violence or a victim of a sexually violent offense. Leave may also be taken by an employee whose family member is a victim of domestic violence or a sexually violent offense. Leave may be taken for the purpose of engaging in any of the following activities as they relate to an incident of domestic violence or a sexually violent offense:

1) Seeking medical attention for, or recovering from, physical or psychological injuries caused by domestic or sexual violence to the employee or the employee's family member;
2) Obtaining services from a victim services organization for the employee or the employee's family member;
3) Obtaining psychological or other counseling for the employee or the employee's family member;
4) Participating in safety planning, temporarily or permanently relocating, or taking other actions to increase the safety from future domestic violence or sexual violence or to ensure the economic security of the employee or the employee's

family member;
5) Seeking legal assistance or remedies to ensure the health and safety of the employee or the employee's family member, including preparing for or participating in any civil or criminal legal proceeding related to or derived from domestic violence or sexual violence; or
6) Attending, participating in or preparing for a criminal or civil court proceeding relating to an incident of domestic or sexual violence of which the employee or the employee's family member, was a victim.

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

Leave under the NJ SAFE Act must be used in the 12-month period immediately following an instance of domestic violence or a sexually violent offense. Employees eligible to take leave under the NJ SAFE Act must, if the necessity for the leave is foreseeable, provide the Company with written notice of the need for the leave, unless an emergency or other unforeseen circumstances precludes prior notice. In all instances, notice should be provided as far in advance as reasonable and practicable under the circumstances. The Company may require the employee to provide documentation of the domestic violence or sexually violent offense that is the basis for the leave. The Company will retain any documentation provided to it in this manner in the strictest confidentiality, unless the disclosure is voluntarily authorized in writing by the employee or is authorized by a federal or New Jersey law, rule or regulation.

The unpaid leave may be taken intermittently in intervals of no less than one (1) day. Employees may elect to substitute available paid time off or any family temporary disability leave benefits during unpaid leave taken under this policy, but this substitution does not extend the length of the leave. If the employee requests leave for a reason covered by both the NJ SAFE Act and the NJ Family Leave Act, or the federal FMLA, the leave will count simultaneously against the employee's entitlement under each respective law.

The NJ SAFE Act also prohibits an employer from discharging, harassing or otherwise discriminating or retaliating or threatening to discharge, harass or otherwise discriminate against an employee with respect to the compensation, terms, conditions or privileges of employment on the basis that the employee took or requested any leave that the employee was entitled to under the NJ SAFE Act, or on the basis that the employee refused to authorize the release of information deemed confidential under the NJ SAFE Act.

To obtain relief for a violation of the NJ SAFE Act, an aggrieved person must file a private cause of action in the Superior Court within one (1) year of the date of the alleged violation.

New Jersey Family Leave (Addendum to FMLA Policy)

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

Eligibility. NJFLA leave is available to "NJFLA eligible employees." To be an NJFLA eligible employee, an employee must:

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

"Base Hours" are the hours of work for which the employee receives compensation including overtime hours and hours for which the employee receives workers' compensation benefits.

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

jeopardize the health of others.

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

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

Intermittent Leave and Reduced Leave Schedules. FMLA and/or NJFLA leave usually will be taken for a period of consecutive days, weeks or months. Under the NJFLA, intermittent leave must be taken in increments of at least one week and reduced schedule leave must be at least one work day over a period of 12 consecutive months. Additionally, under NJFLA, employees may take intermittent leave for bonding with the employee’s child after birth or placement of the child for adoption or as a foster child. NJFLA also may be taken intermittently in the case of leave taken due to an epidemic of a communicable disease, a known or suspected exposure to the communicable disease, or efforts to prevent spread of the communicable disease, if: (1) the covered individual provides the Company with prior notice of the leave as soon as practicable; and (2) the covered individual makes a reasonable effort to schedule the leave so as not to unduly disrupt the operations of the Company and, if possible, provide the Company, prior to the commencement of the intermittent leave, with a regular schedule of the day or days of the week on which the intermittent leave will be taken.

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

Substitute Paid Leave for Unpaid FMLA and NJFLA Leave. Employees may use any accrued paid time off while taking unpaid FMLA and/or NJFLA leave, except that employees will not be required to use any paid time off during any leave also covered under the New Jersey SAFE Act. The substitution of paid time for unpaid FMLA and/or NJFLA leave time does not extend the length of FMLA and/or NJFLA leaves and the paid time will run concurrently with an employee's FMLA and/or NJFLA entitlement.

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

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

Reviewed 1.1.24

NEW MEXICO SUPPLEMENT

About This New Mexico Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, New Mexico employees will receive the Company's national handbook ("Handbook") and the New Mexico Supplement to the Handbook ("New Mexico Supplement") (together, the "Employee Handbook").

The New Mexico Supplement applies only to New Mexico employees. It is intended as a resource containing specific provisions derived under New Mexico law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the New Mexico Supplement are different from or more generous than those in the Handbook, the policies in the New Mexico Supplement will apply.

The New Mexico Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

New Mexico Earned Sick Leave

Eligibility. The Company provides earned sick leave to employees who work in New Mexico. For employees who work in New Mexico who are eligible for sick time under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing earned sick leave pursuant to this policy on July 1, 2022 or at the start of employment, whichever is later. Employees accrue one (1) hour of earned sick leave for every thirty (30) hours worked. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case earned sick leave accrues based upon that normal workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may use earned sick leave immediately. Earned sick leave may be used in 15 minute increments. An employee may not use more than sixty four (64) hours of earned sick leave in any year.

Employees may use earned sick leave for absences due to:

5) An employee's mental or physical illness, injury or health condition; an employee's medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; an employee's preventive medical care;
6) Care of a family member of the employee for mental or physical illness, injury or health condition; care of a family member of the employee for medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; care of a family member of the employee for preventive medical care;
7) Meetings at the employee's child's school or place of care related to the child's health or disability
8) Absences necessary due to domestic abuse, sexual assault or stalking suffered by the employee or a family member of the employee provided that the leave is for the employee to:
    a. obtain medical or psychological treatment or other counseling;
    b. relocate;
    c. prepare for or participate in legal proceedings; or
    d. obtain services or assist a family member of the employee with any of the activities set forth in Subparagraphs (a) through (c).

For purposes of this policy, family member includes an employee's spouse or domestic partner or a person related to an employee or an employee's spouse or domestic partner as: (1) a biological, adopted or foster child, a stepchild or legal ward, or a child to whom the employee stands in loco parentis; (2) a biological, foster, step or adoptive parent or legal guardian, or a person who stood in loco parentis when the employee was a minor child; (3) a grandparent; (4) a grandchild; (5) a biological, foster, step or adopted sibling; (6) a spouse or domestic partner of a family member; or (7) an individual whose close association with the employee or the employee's spouse or domestic partner is the equivalent of a family relationship. A domestic partner includes an individual with whom another individual maintains a household and a mutual committed relationship without a legally recognized marriage.

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

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available earned sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have earned sick leave available.

Notice & Documentation. When an employee needs to use earned sick leave, the employee or an individual acting on the employee's behalf must make an oral or written request to their manager/supervisor to use the leave. When possible, the request must

include the expected duration of the sick leave absence. When the need to use earned sick leave is foreseeable, the employee must make a reasonable effort to provide advance notice before using the earned sick leave and must make a reasonable effort to schedule use of earned sick leave in a way that does not disrupt the Company's operations. When the need to use earned sick leave is not foreseeable, the employee must notify their manager/supervisor as soon as practicable

Employees may be required to provide reasonable documentation for the use of earned sick leave if the employee used earned sick leave for two or more consecutive workdays. Where sick leave is requested for reasons 1 or 2 above, documentation signed by a health care professional indicating the sick leave taken is necessary will be considered reasonable documentation. Where sick leave is requested for reason 4 above, an employee may provide one of the following: a police report; a court-issued document; or a signed statement by a victim services organization, clergy member, attorney, advocate, the employee, a family member, or any other person. The signed statement does not have to be notarized or be in any particular format. It only needs to affirm the employee took earned sick leave for one of the purposes specified by the Act. An employee is allowed up to fourteen (14) days from the date they return to work to provide the documentation. The documentation does not need to explain the nature of any medical condition or the details of the domestic abuse, sexual assault, or stalking. The Company will never delay the use of earned sick leave because the employer has not yet received documentation. All information and documentation received about an employee's reasons for taking earned sick leave is confidential. The Company will not disclose the above-referenced information except with the employee's permission or as necessary for validation of disability insurance claims, accommodations consistent with the federal Americans with Disabilities Act (ADA), as required by the Healthy Workplaces Act, or by Court Order.

Payment. Earned sick leave will be paid at the same hourly rate and with the same benefits the employee normally earns during hours worked at the time the employee uses such time, but no less than the applicable minimum wage. Use of earned sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to sixty four (64) hours of accrued, unused earned sick leave to the following year. Unused earned sick leave will not be paid at separation.

Enforcement & Retaliation. Retaliation against an employee who requests or uses earned sick leave is prohibited. An employee has the right to file a complaint with the New Mexico Department of Workforce Solutions, Labor Relations Division if earned sick leave as required by law is denied by an employer or if the employee is subjected to retaliation for requesting or taking earned sick leave. The New Mexico Department of Workforce Solutions, Labor Relations Division can be reached by calling (505) 841-4400, visiting www.dws.state.nm.us, or going to a New Mexico Workforce Connections Office.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Reviewed 1.1.24

NEW YORK SUPPLEMENT

About This New York Supplement

The Company is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, New York employees will receive the Company's national handbook ("Handbook") and the New York Supplement to the Handbook ("New York Supplement") (together, the "Employee Handbook").

The New York Supplement applies only to New York employees. It is intended as a resource containing specific provisions derived under New York law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the New York Supplement are different from or more generous than those in the Handbook, the policies in the New York Supplement will apply.

The New York Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Sexual Harassment (Addendum To Sexual and Other Unlawful Harassment Policy)

The Company does not tolerate and prohibits sexual harassment of or against our employees, applicants, and interns by another employee, supervisor, vendor, customer, or any third party. The policy also protects contractors, subcontractors, vendors, consultants, or anyone else providing services in our workplace. These individuals include persons commonly referred to as independent contractors, gig workers, and temporary workers. Also included are persons providing equipment repair, cleaning services, or any other services through a contract with the Company.

Bystander Intervention. Any employee witnessing harassment as a bystander is encouraged to report it. There are five standard methods of bystander intervention that can be used when anyone witnesses harassment or discrimination and wants to help.

1. A bystander can interrupt the harassment by engaging with the individual being harassed and distracting them from the harassing behavior;
2. A bystander who feels unsafe interrupting on their own can ask a third party to help intervene in the harassment;
3. A bystander can record or take notes on the harassment incident to benefit a future investigation;

4. A bystander might check in with the person who has been harassed after the incident, see how they are feeling and let them know the behavior was not ok; and
5. If a bystander feels safe, they can confront the harassers and name the behavior as inappropriate. When confronting harassment, physically assaulting an individual is never an appropriate response.

Though not exhaustive, and dependent on the circumstances, the guidelines above can serve as a brief guide of how to react when witnessing harassment in the workplace. Any employee witnessing harassment as a bystander is encouraged to report it. A supervisor or manager that is a bystander to harassment is required to report it.

Written complaints can be submitted internally using the form provided with this policy. Use of this written complaint form is not required. For anyone who would rather make a complaint verbally, or by email, these complaints will be treated with equal priority. A verbal or otherwise written complaint (such as an email) on behalf of oneself or another employee is also acceptable.

Legal Protections and External Remedies. An employee or covered individual who prefers not to report harassment to their manager or employer may choose to pursue external legal remedies. Complaints may be made to both the employer and a government agency. Aside from the internal complaint process at the Company, employees may choose to pursue external legal remedies with the following governmental entities based on the noted federal, state and local protections.

State Human Rights Law (HRL)

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

Complaints of sexual harassment may be filed in either forum any time within three years from the time of the incident(s) that gave rise to the claim. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

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

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your

employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees, punitive damages and civil fines.

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

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

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a digital complaint process that can be completed on your computer or mobile device from start to finish. The website also has a complaint form that can be downloaded, filled out, and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred. If the EEOC determines that the law may have been violated, the EEOC will try to reach a voluntary settlement with the employer. If the EEOC cannot reach a settlement, the EEOC (or the Department of Justice in certain cases) will decide whether to file a lawsuit. The EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court if the EEOC closes the charge, is unable to determine if federal employment discrimination laws may have been violated, or believes that unlawful discrimination occurred but does not file a lawsuit.

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

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

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

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they work to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 3rd Floor, New York, New York 10007; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department if you wish to pursue criminal charges.

New York City Supplemental Gender Discrimination Policy.

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

In furtherance of this policy:

- The Company gives employees the option of indicating their preferred name, pronoun and gender title regardless of the individual's sex assigned at birth, anatomy, gender, medical history, appearance, or the sex indicated on the individual's identification except in the limited circumstance where federal, state, or local law requires otherwise (e.g., for purposes of employment eligibility verification with the federal government). This also applies to the Company's systems which do not limit such identifications to male and female only.
- All employees and other individuals are permitted to use single-gender facilities – such as bathrooms and locker rooms - and participate in single-gender programs consistent with their gender identity, regardless of their sex assigned at birth, anatomy, medical history, appearance, or the sex indicated on their identification. To the extent possible, the Company provides single-occupancy restrooms and provides private space within multi-user facilities for individuals with privacy concerns, but will not require use of a single-occupancy restroom because an individual is transgender or gender non-conforming.
- The Company's dress code and grooming standards are gender neutral, and therefore do not differentiate or impose restrictions or requirements based on gender.

- The Company's benefit plans apply equally to all employees regardless of gender and do not provide health benefit plans that exclude coverage for transgender care, also known as transition-related care or gender-affirming care.
- The Company evaluates all requests for accommodations for disability or other request for changes to the terms and conditions of an individual's employment, or participation in a program offered by the Company, which may include additional medical or personal leave or schedule changes in a fair and non-discriminatory manner without regard to gender. To that end, the Company will treat leave requests to address medical or health care needs related to an individual's gender identity in the same manner as requests for all other medical conditions and will provide reasonable accommodations to individuals undergoing gender transition, including medical leave for medical and counseling appointments, surgery and recovery from gender affirming procedures, surgeries and treatments as they would for any other medical condition.
- Employees who engage with the public as part of their job duties are required to do so in a respectful, non-discriminatory manner by respecting gender diversity and ensuring that members of the public are not subject to discrimination (including discrimination with respect to single-sex programs and facilities).

Employees with issues or concerns regarding gender discrimination or who feel they have been subjected to such discrimination can contact Human Resources. The Company prohibits and does not tolerate retaliation against employees who report issues or concerns of gender discrimination pursuant to this policy in good faith.

New York City Reasonable Accommodations & Cooperative Dialogue Policy

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

Any individual who would like to request an accommodation based on any of the reasons set forth above should contact Human Resources, who can provide the requesting employee with an accommodation request form. If an individual who has requested an accommodation has not received an initial response within five (5) business days, the individual should contact the Vice President, Human Resources.

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

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

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

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

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

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

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

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

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

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

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

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

Individuals with questions regarding this policy should contact Human Resources.

Lactation Accommodation Policy

Pursuant to New York City, New York State, and federal law, employees have a right to express breast milk in the workplace and the right to request access to a lactation room for purposes of expressing breast milk.

Employees who are nursing are provided with reasonable unpaid break time for thirty minutes and or permitted to use existing paid break time or meal time for time in excess of thirty minutes to express breast milk for the employee's nursing child each time such employee has a reasonable need to express break milk for up to three (3) years after the birth of a child.

The Company will provide a lactation room to such employees.

For purposes of this policy, the term lactation room means a sanitary place, other than a restroom or toilet stall, that can be used to express breast milk shielded from view and free from intrusion and that includes at minimum an electrical outlet, a chair, a surface on which to place a breast pump and other personal items, and nearby access to running water. Unless doing so poses an undue hardship and such undue hardship exception is permitted by applicable law, the Company will provide (i) a lactation room in reasonable proximity to the employee's work area and (ii) a refrigerator suitable for breast milk

storage in reasonable proximity to such employee's work area. If the room designated by the Company to serve as a lactation room is also used for another purpose, the sole function of the room will be as a lactation room while an employee is using the room to express breast milk. While an employee is using the room to express milk, the Company will provide notice to other employees that the room is given preference for use as a lactation room.

An employee may submit a request for a lactation room by contacting Human Resources. The Company will respond to such requests within five (5) business days. If two or more employees need to use the lactation room at the same time, the employees should discuss with Human Resources so that arrangements can be made to ensure all employees are provided with access to the lactation room amenities. Options may include: finding an alternative clean space free from intrusion; sharing the space among multiple users; or creating a schedule for use.

Where compliance with the lactation room requirements set forth above is impracticable because it would impose an undue hardship on the Company by causing significant difficulty or expense when considered in relation to the size, financial resources, nature, or structure of the Company's business and such undue hardship exception is permitted by applicable law, the Company will make reasonable efforts to provide a room or other location, other than a restroom or toilet stall, that is in close proximity to the work area where an employee can express breast milk in privacy and otherwise engage in a cooperative dialogue with the employee to discuss reasonable alternatives with the employee in an attempt to accommodate the employee's needs.

If the workplace has access to refrigeration, the Company will extend such access to refrigeration for the purposes of storing the expressed milk.

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

For additional details, please refer to the New York State Department of Labor's Policy on the Rights of Employees to Express Breast Milk in the Workplace.

New York City Temporary Schedule Change

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

A temporary schedule change may last up to one (1) business day on two (2) separate occasions or up to two (2) business days on one (1) occasion each calendar year. A business day is any twenty four (24) hour period during which an employee is required to work any amount of time.

A temporary change means an adjustment to an employee's usual schedule including in the hours, times or locations an employee is expected to work. The change can include using short-term unpaid leave, paid time off, working remotely, or swapping or shifting working hours with a co-worker. The Company has the option of granting unpaid leave in lieu of the temporary change requested by the employee.

A "personal event" includes the following:

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

For purposes of this policy a "family member" includes: a child (biological, adopted, or foster child; legal ward; child of an employee standing in loco parentis); a grandchild; a spouse (current or former regardless of whether they reside together); a domestic partner (current or former regardless of whether they reside together); a parent; a grandparent; a child or parent of an employee's spouse or domestic partner; a sibling (including a half, adopted, or step sibling); any other individual related by blood to the employee; and any individual whose close association with the employee is the equivalent of family.

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

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

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

If the employee requested the schedule change orally (for example, in person or by phone), the employee must submit a written request no later than the second business day after the employee returns to work. The employee should include in the written

request the date of the temporary schedule change and that the change was due to a personal event.

The Company will provide a written response to any written request for temporary schedule change within fourteen (14) days. The response will include:

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

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

Employees with questions concerning this policy should contact Human Resources.

New York Paid Sick Leave

Eligibility. The Company provides paid sick leave and paid prenatal personal leave (effective January 1, 2025) to employees who work in New York. For employees who work in New York who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick leave pursuant to this policy at the start of employment. Employees will accrue one (1) hour of paid sick leave for every thirty (30) hours worked, up to a maximum accrual of fifty-six (56) hours each calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid sick leave accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued paid sick leave immediately. Paid sick leave may be used in the smallest increment of time tracked by the Company's payroll system. An employee may not use more than fifty-six (56) hours of accrued paid sick leave in any calendar year.

Employees may use accrued paid sick leave:

1) For a mental or physical illness, injury, or health condition of such employee or such employee's family member, regardless of whether such illness, injury, or

health condition has been diagnosed or requires medical care at the time that such employee requests such leave;

2) For the diagnosis, care, or treatment of a mental or physical illness, injury or health condition of, or need for medical diagnosis of, or preventive care for, such employee or such employee's family member; or
3) For an absence from work due to any of the following reasons when the employee or employee's family member has been the victim of domestic violence, a family offense, sexual offense, stalking, or human trafficking:
    a. to obtain services from a domestic violence shelter, rape crisis center, or other services program;
    b. to participate in safety planning, temporarily or permanently relocate, or take other actions to increase the safety of the employee or employee's family members;
    c. to meet with an attorney or other social services provider to obtain information and advice on, and prepare for or participate in any criminal or civil proceeding;
    d. to file a complaint or domestic incident report with law enforcement;
    e. to meet with a district attorney's office;
    f. to enroll children in a new school; or
    g. to take any other actions necessary to ensure the health or safety of the employee or the employee's family member or to protect those who associate or work with the employee.

A person who has committed such domestic violence, family offense, sexual offense, stalking, or human trafficking will not be eligible for paid sick leave for situations in which the person committed such offense and was not a victim, notwithstanding any family relationship.

For purposes of this policy, “family member” means an employee’s child (biological, adopted, or foster child, a legal ward, or a child of an employee standing in loco parentis), spouse, domestic partner, parent (biological, foster, step, adoptive, legal guardian, or person who stood in loco parentis when the employee was a minor child), sibling, grandchild, or grandparent; and the child or parent of an employee’s spouse or domestic partner.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

Notice and Documentation. Employees must make requests to use paid sick leave orally or in writing to their supervisor.

The Company may require supporting documentation for the use of paid sick leave where the employee uses sick leave for three or more consecutive or previously scheduled work days or shifts, to the extent permitted by applicable law. Requests for documentation

should not specify the reason for leave but should be limited to: (i) an attestation from a licensed medical provider supporting the existence of a need for sick leave, the amount of leave needed, and a date that the employee may return to work; or (ii) an attestation from an employee of their eligibility to leave. The Company will not require the disclosure of confidential information relating to a mental or physical illness, injury, or health condition of such employee or such employee's family member, or information relating to absence from work due to domestic violence, a sexual offense, stalking, or human trafficking, as a condition of providing paid sick leave. The Company will not require an employee to pay any costs or fees associated with obtaining medical or other verification of eligibility for use of sick leave.

Payment. Paid sick leave will be paid at the employee's regular rate of pay or the applicable state minimum wage, whichever is greater. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over accrued, unused paid sick leave under this policy to the following calendar year. Accrued but unused paid sick leave under this policy will not be paid at separation.

Effective January 1, 2025: Additional Paid Prenatal Personal Leave. In addition to paid sick leave as set forth above, employees may take up to twenty (20) hours of paid prenatal personal leave during any 52-week calendar period. Paid prenatal personal leave may be taken in hourly increments. Paid prenatal personal leave may be used for the health care services received by an employee during their pregnancy or related to such pregnancy, including physical examinations, medical procedures, monitoring and testing, and discussions with a health care provider related to the pregnancy. The Company will not require the disclosure of confidential information as a condition of providing paid prenatal personal leave. Paid prenatal personal leave will be paid at the employee's regular rate of pay, or the applicable minimum wage rate, whichever is greater. Use of paid prenatal personal leave is not considered hours worked for purposes of calculating overtime. Unused prenatal personal leave under this policy will not be paid at separation.

Enforcement & Retaliation. Employees will not be discharged, threatened, penalized or in any other manner discriminated or retaliated against because such employee has exercised their rights to paid sick leave and paid prenatal personal leave (effective January 1, 2025) under this policy and applicable law including, but not limited to, requesting paid sick leave or paid prenatal personal leave (effective January 1, 2025) and using paid sick leave or paid prenatal personal leave (effective January 1, 2025) , consistent with this policy and applicable law.

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

New York City Earned Safe and Sick Time (For Employees Also Covered under the New York Paid Sick Leave Law)

Eligibility. The Company provides paid safe/sick time and paid prenatal personal leave (effective January 1, 2025) to employees who work in New York City. For employees who work in New York City who are eligible for safe and sick time under a general paid time off or paid sick leave policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than a general paid time off or paid sick leave policy, if applicable.

Accrual. Employees begin accruing paid safe/sick time pursuant to this policy at the start of employment. Eligible employees will accrue one (1) hour of paid safe/sick time for every thirty (30) hours worked, up to a maximum accrual of fifty-six (56) hours each calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid safe/sick time accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued paid safe/sick time immediately. Paid safe/sick time may be used in the smallest increment of time tracked by the Company's payroll system. An employee may not use more than fifty-six (56) hours of accrued paid safe/sick time in any calendar year.

Employees may use accrued paid safe/sick time for absences due to:

1) The employee's mental or physical illness, injury or health condition or need for medical diagnosis, care or treatment of a mental or physical illness, injury or health condition or need for preventive medical care;
2) The care of the employee's family member who needs medical diagnosis, care or treatment of a mental or physical illness, injury or health condition or who needs preventive medical care;
3) Closure of the employee's place of business by order of a public official due to a public health emergency or such employee's need to care for a child whose school or childcare provider has been closed by order of a public official due to a public health emergency; or
4) The employee or a family member of the employee being the victim of domestic violence, family offense matters, sexual offenses, stalking, or human trafficking:
    a. To obtain services from a domestic violence shelter, rape crisis center, or other shelter or services program for relief from domestic violence, a family offense matter, sexual offense, stalking, or human trafficking;
    b. To participate in safety planning, temporarily relocate, or take other actions to increase the safety of the employee or employee's family members from future domestic violence, family offense matters, sexual offenses, stalking, or human trafficking;
    c. To meet with a civil attorney or other social service provider to obtain information and advice on, and prepare for or participate in any criminal or

civil proceeding, including but not limited to, matters related to domestic violence, a family offense matter, sexual offense, stalking, human trafficking, custody, visitation, matrimonial issues, orders of protection, immigration, housing, discrimination in employment, housing or consumer credit;

d. To file a complaint or domestic incident report with law enforcement;
e. To meet with a district attorney's office;
f. To enroll children in a new school; or
g. To take other actions necessary to maintain, improve, or restore the physical, psychological, or economic health or safety of the employee or employee's family member or to protect those who associate or work with the employee.

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

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

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available safe/sick time for absences for reasons set forth above and employees will be paid for such absences to the extent they have safe/sick time available.

Employees will be advised of the amount of safe/sick time accrued and used during a pay period and total balance of accrued safe/sick available for use time on the employee's pay statement or other form of written documentation provided each pay period.

Notice and Documentation. Employees must make requests to use paid safe/sick time orally or in writing to their supervisor.

The Company may require supporting documentation if the employee uses accrued paid safe/sick time for more than three (3) consecutive work days, to the maximum extent permitted by applicable law. Requests for documentation should not specify the reason for leave but should be limited to: (i) an attestation from a licensed medical provider supporting the existence of a need for the amount of safe/sick time taken; or (ii) an attestation from an employee of their eligibility for safe/sick time. The Company will not require an employee to pay any costs or fees associated with obtaining medical or other verification of eligibility for use of safe/sick time and will reimburse the employee to the

extent the employee is charged a fee for providing supporting documentation requested by the Company. The Company will not require the disclosure of confidential information relating to a mental or physical illness, injury, or health condition of such employee or such employee's family member, or information relating to absence from work due to domestic violence, a sexual offense, stalking, or human trafficking, as a condition of providing safe/sick time. Moreover, the Company will not ask the employee to provide details about the medical condition that led the employee to use sick time, or the personal situation that led the employee to use safe time Any information the Company receives about the employee's use of safe/sick time will be kept confidential and not disclosed to anyone without the employee's written permission or as required by law.

Payment. Paid safe/sick time will be paid at the employee's regular rate of pay at the time the employee uses such time, unless otherwise required by applicable law, but no less than the applicable minimum wage. Safe/Sick time will be paid no later than the payday for the next regular payroll period beginning after the safe/sick time was used by the employee. Use of paid safe/sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over accrued, unused paid safe/sick time under this policy to the following calendar year. Accrued but unused paid safe/sick time under this policy will not be paid at separation.

Effective January 1, 2025: Additional Paid Prenatal Personal Leave. In addition to paid sick leave as set forth above, employees may take up to twenty (20) hours of paid prenatal personal leave during any 52-week calendar period. Paid prenatal personal leave may be taken in hourly increments. Paid prenatal personal leave may be used for the health care services received by an employee during their pregnancy or related to such pregnancy, including physical examinations, medical procedures, monitoring and testing, and discussions with a health care provider related to the pregnancy. The Company will not require the disclosure of confidential information as a condition of providing paid prenatal personal leave. Paid prenatal personal leave will be paid at the employee's regular rate of pay, or the applicable minimum wage rate, whichever is greater. Use of paid prenatal personal leave is not considered hours worked for purposes of calculating overtime. Unused prenatal personal leave under this policy will not be paid at separation.

Enforcement & Retaliation. Employees have the right to request and use paid safe/sick time and paid prenatal personal leave (effective January 1, 2025) and may file a complaint for alleged violations of this policy with the New York City Department of Consumer and Workforce Protection or the New York State Department of Labor. The Company prohibits retaliation or the threat of retaliation against an employee for exercising or attempting to exercise any right provided in this policy, or interference with any investigation, proceeding or hearing related to or arising out of employee's rights pursuant to this policy and applicable law.

Employees with questions concerning this policy should contact Human Resources.

Westchester County Safe Time Leave

Eligibility. The Company provides safe time leave to employees who work in Westchester County for more than 90 days in a calendar year and are victims of domestic violence or human trafficking, as defined by below. For employees who work in Westchester County who are eligible for safe time under a general paid time off policy, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy, if applicable.

Available Leave. Eligible employees are entitled to take up to forty (40) hours of paid safe time leave in any year. For purposes of this policy, the year is the 12-month period beginning January 1st and ending on December 31st.

Usage. Employees can begin to use their safe time leave after their 90th calendar day of employment. Safe time leave can be taken in full days and/or in increments.

Employees who are victims of domestic violence or victims of human trafficking may use safe time leave for the following reasons:

1) To attend and/or testify in criminal court proceedings relating to domestic violence or human trafficking;
2) To attend and/or testify in civil court proceedings relating to domestic violence or human trafficking; or
3) To move to safe location.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available safe time leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have safe time leave available.

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

Notice and Documentation. Notice to the employee's supervisor may be given orally, in writing, or by electronic means. When possible, the request should include the expected duration of the absence. When the use of safe time leave is foreseeable, the employee shall make a good faith effort to provide notice to their supervisor in advance and, when possible, shall make a reasonable effort to schedule the use of safe time leave in a manner that does not unduly disrupt the operations of the Company.

Employees may be required to provide reasonable documentation that the safe time leave has been used for one of the enumerated purposes above. Documentation provided by the employee may include any one of the following:

1. a court appearance ticket or subpoena;
2. a copy of a police report;

3. an affidavit from an attorney involved in the court proceeding relating to the issue of domestic violence and/or human trafficking; or
4. an affidavit from an authorized person from a reputable organization known to provide assistance to victims of domestic violence and victims of human trafficking (such as My Sisters' Place).

Payment. Safe time leave is paid at the hourly rate the employee normally earns from employment at the time the employee uses such time, unless otherwise required by applicable law. Use of safe time leave is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Unused safe time leave does not carry over from year to and will not be paid upon separation.

Enforcement & Retaliation. Retaliation against employees who request or use safe time leave is prohibited. Employees have the right to file a complaint with the Department of Weights and Measures – Consumer Protection if they believe they have been denied safe time leave, retaliated against, or that their rights to safe time leave has been otherwise interfered with or restrained; or may bring a civil action in the event of retaliation.

Employees with questions or concerns regarding this policy can contact Human Resources.

Blood Donation Leave

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

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

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

New York State Paid Family Leave

Eligibility Requirements. Employees who have a regular work schedule of 20 or more hours per week and have been employed at least 26 consecutive weeks prior to the date paid family leave (“PFL”) begins (or who have a regular work schedule of less than 20 hours per week and have worked at least 175 days prior to the date PFL begins) are eligible for PFL. Paid time off can be counted toward an employee’s eligibility

determination. Employees are eligible for PFL regardless of citizenship and/or immigration status. An employee has the option to file a waiver of PFL and therefore not be subject to deductions when their regular employment schedule is: (i) 20 or more hours per week but the employee will not work 26 consecutive weeks; or (ii) less than 20 hours per week and the employee will not work 175 days in a 52 consecutive week period.

Entitlement. PFL is available to eligible employees for up to twelve (12) weeks within any 52 consecutive week period: (a) to participate in providing care, including physical or psychological care, for the employee's family member (child, spouse, domestic partner, parent, grandchild grandparent or sibling as each of such family members are defined under applicable law) with a serious health condition; or (b) to bond with the employee's child during the first twelve months after the child's birth, adoption or foster care placement; or (c) for qualifying exigencies, as interpreted by the Family and Medical Leave Act (FMLA), arising out of the fact that the employee's spouse, domestic partner, child, or parent is on active duty (or has been notified of an impending call or order to active duty) in the armed forces of the United States. The 52 consecutive week period is determined retroactively with respect to each day for which PFL benefits are currently being claimed.

PFL benefits are financed solely through employee contributions via payroll deductions. The weekly monetary benefit will be 67% of the employee's average weekly wage or 67% of the state average weekly wage, whichever is less.

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

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

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

Definition of a Serious Health Condition. A serious health condition is an illness, injury, impairment, or physical or mental condition, including transplantation, preparation and recovery from surgery related to organ or tissue donation, that involves: (a) inpatient care in a hospital, hospice or residential health care facility; or (b) continuing treatment or continuing supervision by a health care provider.

Use of Leave. An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently in daily increments. Leave taken on an intermittent basis will not result in a reduction of the total amount of leave to which an employee is entitled beyond the amount of leave actually taken.

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

Employees must provide sufficient information to make the Company aware of the qualifying event and the anticipated timing and duration of the leave. Employees must specifically identify the type of family leave requested. Employees also must provide medical certifications and periodic recertification or other supporting documentation or certifications supporting the need for leave. An employee requesting paid family leave must submit a completed Request for Paid Family Leave or PFL-1 form and additional certification form(s) as follows to Sentry Insurance: (1) Bonding Certification: PFL-2 Form plus documentation; (2) Health Care Provider Certification: PFL-4 Form plus Personal Health Information (PHI) Release (PFL-3 Form); or (3) Military Qualifying Event: PFL-5 Form plus documentation. To obtain the PFL claim forms, employees must contact the Company's PFL Carrier, Sentry Insurance at 800-473-6879.

To submit a request for PFL, employees must populate the employee's portion of Carrier's PFL-1 Form, and submit it to the Company at Benefits@CreativeCircle.com.The Company will populate its section of the form, and will return it to employees within 3 business days. If the Company fails to respond, employees may submit all materials directly to Sentry Insurance. Depending on the type of PFL leave employees are seeking, employees will be required to complete additional PFL forms as described in the notice employees will receive from Sentry Insurance. Employees must submit the completed PFL forms to Sentry Insurance before or within 30 days after the start of their leave. Sentry Insurance must pay or deny leave requests within 18 calendar days of receiving an employee's completed forms.

Job Benefits and Protection. During any PFL taken pursuant to this policy, the Company will maintain coverage under any existing group health insurance benefits plan as if the employee had continued to work. The employee must make arrangements with Human Resources prior to taking leave to pay their portion of any applicable health insurance premiums each month.

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

Any employee who exercises their right to PFL will receive job protection. This means that upon the expiration of that leave, the employee will be entitled to be restored to the position held by the employee when the leave commenced, or to a comparable position with comparable benefits, pay, and other terms and conditions of employment. The taking of leave covered by PFL will not result in the loss of any employment benefit accrued prior to the date on which the leave commenced. The taking of leave covered by PFL will not result in the loss of any employment benefit accrued prior to the date on which the leave commenced. You will not accrue paid time off and be paid for office closures while on paid family leave.

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

Questions and/or Complaints about PFL. If employees have any questions regarding this policy, they should contact Human Resources. For additional information concerning leave entitlements and obligations that might arise when PFL is either not available or exhausted, please consult the Company's other leave policies or contact Benefits@CreativeCircle.com.The Company is committed to complying with the PFL and shall interpret and apply this policy in a manner consistent with the PFL. Employees who disagree with a denial of their claim for PFL may submit their dispute to arbitration. Employees will be provided with information about how to request arbitration.

Employees are protected from discrimination and retaliation for requesting or taking PFL. If employees believe their rights have been violated and/or denied job restoration as a result of requesting and/or taking PFL, they must send Human Resources (HumanResources@CreativeCircle.com) a formal request for job reinstatement using the *Formal Request For Reinstatement Regarding Paid Family Leave (Form PFL-DC-119)*, which can be found in the forms section of https://www.ny.gov/PaidFamilyLeave. Employees must file the completed form with the Company and send a copy to: Paid Family Leave, P.O. Box 9030, Endicott, NY 13761-9030. If the Company does not comply with an employee's request for reinstatement within 30 days, the employee may file a PFL discrimination complaint with the Workers' Compensation Board using the *Paid Family Leave Discrimination Complaint (Form PFL-DC-120)*, which is also available on the New York Paid Family Leave website. Once an employee's complaint is received, the Board will assemble the employee's case and schedule a preliminary hearing in front of a Workers' Compensation Law Judge.

Updated 6.1.24

SEXUAL HARASSMENT COMPLAINT FORM – NEW YORK

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

General Information

Your Name / Job Title:

Your Department / Supervisor:

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

Complaint Information

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

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

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

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

This last question is optional, but may help the investigation

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

Signature: _____ Date: _____

New York Supplement to Anti-Harassment and Discrimination Policy

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, this New York Supplement to the Anti-Harassment and Discrimination Policy is being provided to New York employees. It is intended to be read together with the Anti-Harassment and Discrimination Policy ("Policy") and is intended as a resource containing specific provisions derived under New York anti-sexual harassment laws. The Policy and this New York Supplement will be referred to below collectively as the "Policy."

APPLICABILITY

The Company does not tolerate and prohibits sexual harassment of or against our employees, applicants, and interns by another employee, supervisor, vendor, customer, or any third party. The policy also protects contractors, subcontractors, vendors, consultants, or anyone else providing services in our workplace. These individuals include persons commonly referred to as independent contractors, gig workers, and temporary workers. Also included are persons providing equipment repair, cleaning services, or any other services through a contract with the Company. In the remainder of this document, the term "employees" refers to this collective group.

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment includes, but is not limited to, making unwelcome sexual advances, requests for sexual favors, and/or other unwelcome conduct which is either sexual in nature or which is directed at an individual because of that individual's sex when:

- submission to such conduct is made an explicit or implicit term or condition of an individual's employment;
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment, even if the reporting individual is not the intended target of the sexual harassment.

EXAMPLES OF SEXUAL HARASSMENT

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;

    - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
    - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
    - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
    - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
    - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
    - Sabotaging an individual's work;
    - Bullying, yelling, name-calling.

RETALIATION PROHIBITED

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in "protected activity." Protected activity occurs when a person has:

- made a complaint of sexual harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other law;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

SUPERVISORY RESPONSIBILITIES

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to the Human Resources Department.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

BYSTANDER INTERVENTION

Any employee witnessing harassment as a bystander is encouraged to report it. There are five standard methods of bystander intervention that can be used when anyone witnesses harassment or discrimination and wants to help.

- A bystander can interrupt the harassment by engaging with the individual being harassed and distracting them from the harassing behavior;
- A bystander who feels unsafe interrupting on their own can ask a third party to help intervene in the harassment;
- A bystander can record or take notes on the harassment incident to benefit a future investigation;
- A bystander might check in with the person who has been harassed after the incident, see how they are feeling and let them know the behavior was not ok; and
- If a bystander feels safe, they can confront the harassers and name the behavior as inappropriate. When confronting harassment, physically assaulting an individual is never an appropriate response.

Though not exhaustive, and dependent on the circumstances, the guidelines above can serve as a brief guide of how to react when witnessing harassment in the workplace. Any employee witnessing harassment as a bystander is encouraged to report it. A supervisor or manager that is a bystander to harassment is required to report it.

COMPLAINT AND INVESTIGATION OF SEXUAL HARASSMENT

All complaints about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner, and will be confidential to the extent possible. Any harassing conduct, even a single incident, can be addressed under this Policy. Employees who are reporting sexual harassment on behalf of other employees should use the Harassment and Discrimination Complaint Form included with this Policy, and note that it is on another employee's behalf.

An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced in a timely manner and completed as soon as possible. All persons involved, including complainants, witnesses and alleged

harassers, will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

All employees, including managers and supervisors, are required as needed to cooperate with any internal investigation of suspected sexual harassment. The Company will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy. Any employee who retaliates against anyone involved in a harassment investigation will be subjected to disciplinary action, up to and including termination.

While the process may vary from case to case, investigations will generally include the following steps. When the Human Resources Department receives a complaint, it will conduct a timely review of the allegations, and take interim actions, if any, that may be appropriate. If the complaint is verbal, the individual will be encouraged to complete the Harassment and Discrimination Complaint Form in writing. If the individual declines to complete the Harassment and Discrimination Complaint Form, information regarding the allegations will be gathered through an interview with the individual. If there are any documents, emails or phone records that are relevant to the investigation, steps will be taken to obtain, preserve, and review them. All parties involved, including any relevant witnesses, will be interviewed. Written documentation of the investigation, which contains all relevant information, will be prepared, and will be kept in a secure and confidential location. Once a final determination is made, the individual who reported and the individual(s) about whom the complaint was made will be notified, and corrective actions, if any, will be implemented.

LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Sexual harassment is not only prohibited by the Company, but is also prohibited by state, federal, and, where applicable, local law. The summary below describes the applicable statutory provisions concerning sexual harassment, and legal remedies employees may also choose to pursue with governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek legal advice from an attorney of your own choosing, at your own expense.

State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court. You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

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

Complaining internally to the Company does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

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

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov. If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Local Police Department
If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department if you wish to pursue criminal charges.

Updated 5.18.23

Harassment and Discrimination Complaint Form

Name: _____

Office/Recruiter: _____

Type of Complaint: _____

Date incident reported: _____ Reported to: _____

Please describe the specific incident(s) that you feel constitute harassment, discrimination, or retaliation.

What is/are the date/s the incident occurred? _____

Please describe the incident including what occurred, when it occurred, and whether there were any witnesses other than yourself to the event(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 harassment, discrimination, 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.

OREGON SUPPLEMENT

About This Oregon Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Oregon employees will receive the Company's national handbook ("National Handbook") and the Oregon Supplement to the National Handbook ("Oregon Supplement") (together, the "Employee Handbook").

The Oregon Supplement applies only to Oregon employees. It is intended as a resource containing specific provisions under Oregon law that apply to the employee's employment. It should be read together with the National Handbook and, to the extent that the policies in the Oregon Supplement are different from or more generous than those in the National Handbook, the policies in the Oregon Supplement will apply.

The Oregon Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Oregon Supplement to Anti-Harassment and Discrimination Policy

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

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

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

Breaks & Meal Periods (For Non-Exempt Employees)

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

Rest breaks should be taken approximately the middle of each work period of four hours or major fraction thereof as is feasible. Employees are paid for all rest break periods and do not need to clock out when taking a rest break. Rest breaks may not be added to the usual meal period or deducted from the beginning or end of the work period to reduce the overall length of the total work period. Each rest break must be a separate break, meeting the requirements described above. If any work is performed during a rest break, or if the rest break is interrupted for any work-related reason, the employee is entitled to another uninterrupted paid rest break.

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

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

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

Those employees who use a time clock must clock out for their meal periods. Employees are required to clock back in and promptly return to work at the end of any meal period. Employees who record their time manually must accurately record their

meal periods by recording the beginning and end of each work period. Employees are to immediately notify Human Resources if they believe that they are prevented by the nature of their work from taking a timely and/or complete meal period.

No Working During Rest Breaks and Meal Periods. Non-exempt employees are completely relieved of all work duties during their rest breaks and meal periods. All rest breaks and meal periods must be taken outside employees' work areas, such as in a break room. Employees may not leave the premises during rest breaks and meal periods. Employees are not expected to remain "on call" or available to respond to messages, monitor radios, telephones, email or other devices during meal periods and rest breaks. Employees should not visit or socialize with employees who are working while taking their rest break or meal period. Employees are required to take all mandated breaks. Failure to do so may request in discipline, up to and including termination.

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

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

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

Oregon Paid Sick Time

Eligibility. The Company provides paid sick time to eligible employees who work in Oregon. For employees who work in Oregon who are eligible for sick time under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick time pursuant to this policy at the start of employment. Eligible employees accrue 1 hour of paid sick time for every thirty (30) hours worked, up to a maximum accrual of forty (40) hours each year. Exempt employees will be presumed to work forty (40) hours in each workweek for accrual purposes unless their normal workweek is less than forty (40) hours, in which case accrual will be based on that normal workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued paid sick time on the 91st calendar day of employment. Paid sick time may be used in hourly increments. An employee may not use more than forty (40) hours of accrued paid sick time in any year.

An employee may use paid sick time for the following reasons:

1) For an employee's or a family member's mental or physical illness, injury or health condition, need for medical diagnosis, care or treatment of a mental or physical illness, injury or health condition or need for preventive medical care;
2) For any covered purpose under the Oregon Family Leave Act:
    a) to recover from or seek treatment for a serious health condition, as defined under Oregon law, that renders the employee unable to perform at least one of the essential functions of the employee's regular position;
    b) to care for a family member with a serious health condition, as defined under Oregon law;
    c) to care for an infant or newly adopted child under 18 years of age, or for a newly placed foster child under 18 years of age, or for an adopted or foster child older than 18 years of age if the child is incapable of self-care because of a mental or physical disability, within twelve (12) months after the child's birth or placement;
    d) to care for a child who is suffering from an illness, injury or condition that is not a serious health condition but that requires home care; or
    e) for bereavement purposes, e.g., to deal with the death of a family member by attending a funeral (or alternative to a funeral), making related arrangements, or grieving, within 60 days of the date on which the employee received notice of the death of the family member; or
3) For reasons relating to domestic violence, harassment, sexual assault, or stalking of an employee or an employee's minor child or dependent, in accordance with Oregon law, such as:
    a) to seek legal or law enforcement assistance or remedies to ensure the health and safety of the employee or the employee's minor child or dependent, including preparing for and participating in protective order proceedings or other related civil or criminal legal proceedings;
    b) to seek medical treatment for or to recover from related injuries;
    c) to obtain, or to assist a minor child or dependent in obtaining, counseling from a licensed mental health professional;
    d) to obtain services from a victim services provider; or
    e) to relocate or take steps to secure an existing home to ensure the health and

safety of the eligible employee or the employee's minor child or dependent; or

4) In the event of a public health emergency, which includes, but is not limited to:
    a) closure of the employee's place of business, or the school or place of care of the employee's child, by order of a public official due to a public health emergency;
    b) a determination by a lawful public health authority or by a health care provider that the presence of the employee or the family member of the employee in the community would jeopardize the health of others, such that the employee must provide self-care or care for the family member;
    c) the exclusion of the employee from the workplace under any law or rule that requires the employer to exclude the employee from the workplace for health reasons.
    d) an emergency evacuation order of level 2 (SET) or level 3 (GO) issued by a public official with the authority to do so, if the affected area subject to the order includes either the location of the employer's place of business or the employee's home address; or
    e) a determination by a public official with the authority to do so that the air quality index or heat index are at a level where continued exposure to such levels would jeopardize the health of the employee.

For purposes of this policy, family members includes a: spouse; same-gender domestic partner; custodial, non-custodial, in loco parentis, adoptive, foster, biological, or step parent; parent-in-law; parent of a same-gender domestic partner; grandparent; grandchild; biological, adopted, foster, or step child, whether a minor an adult; or child of a same-gender domestic partner.

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick time for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick time available.

Paid sick time will run concurrently with any applicable law for which the employee qualifies, including the Oregon Family Leave Act (reason 2 above) and the Oregon leave law for victims of domestic violence, harassment, sexual assault, or stalking (reason 3 above).

Notice and Documentation. If the need to use paid sick time is foreseeable, reasonable advance notice to employee's supervisor or manager, not to exceed ten (10) days prior to the date the paid sick time is to begin, or as soon as otherwise practicable, is required when requesting time off pursuant to this policy. Employees must make a reasonable attempt to schedule the use of paid sick time in a manner that does not unduly disrupt the Company's operations. If possible, employees must include the anticipated duration of their absence when requesting paid sick time, and must inform the Company of any change in the expected duration of the absence. If the need to use paid sick time is unforeseeable (such as a sudden illness, an emergency, or an accident), notice to the employee's supervisor or manager is required before the start of

the employee's shift or, when circumstances prevent such notice, as soon as practicable. If an employee takes more than three (3) consecutively scheduled workdays of paid sick time for reasons 1 through 3 above, the Company may require documentation of the need for the paid sick time in the form of verification from a health care provider or certification such as:

1) A copy of a police report indicating that the employee or the employee's minor child or dependent was a victim of domestic violence, harassment, sexual assault or stalking;
2) A copy of a protective order or other evidence from a court, administrative agency or attorney that the employee appeared in or was preparing for a civil, criminal or administrative proceeding related to domestic violence, harassment, sexual assault or stalking; or
3) Documentation from an attorney, law enforcement officer, health care professional, licensed mental health professional or counselor, member of the clergy or victim services provider that the employee or the employee's minor child or dependent was undergoing treatment or counseling, obtaining services or relocating as a result of domestic violence, harassment, sexual assault or stalking.

If foreseeable paid sick time is projected to last more than three (3) scheduled work days, the verification/certification which may be requested above should be provided before the sick time commences or as soon as otherwise practicable. If an employee needs to take paid sick time but was not able to provide prior notice, medical verification permitted under this policy must be provided to the Company within fifteen (15) calendar days of the Company's request for such verification. Certification for paid sick time used for reason 3 must be provided to the Company within a reasonable time after the Company's request for such certification.

Additionally, if the Company suspects an employee is abusing this policy, the Company may require verification from a health care provider, regardless of whether the employee has used paid sick time for more than three (3) consecutive days. Conduct that may indicate a pattern of abuse under this policy includes, but is not limited to, repeated uses of unscheduled paid sick time on or adjacent to weekends, holidays, vacation days or payday.

Payment. Sick time will be paid at the regular hourly rate that an employee earns for the workweek in which sick time was used, which will be no less than the applicable minimum wage rate. The Company reserves the right to delay payment for paid sick leave if an employee fails to provide verification or certification within the required timeframe. Use of paid sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. Up to forty (40) hours of accrued, unused paid sick time under this policy can be carried over to the following year. Accrued but unused paid sick time under this policy will not be paid at separation.

Enforcement & Retaliation. The Company will not deny, interfere with, restrain or fail

to pay for sick time to which an employee is entitled pursuant to this policy and/or applicable law, or retaliate or discriminate against an employee who requests or takes time off pursuant to this policy or participates in any manner in an investigation, proceeding, or hearing related to this policy and/or applicable law. Employees may file a complaint with the Commissioner of the Bureau of Labor and Industries.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Oregon Family Leave (Addendum to FMLA Policy)

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

Eligibility. OFLA leave is available to "OFLA eligible employees." To be an OFLA eligible employee, an employee must:

1) Have been employed by the Company for at least 180 days immediately preceding the day the leave begins*;
2) Have worked an average of at least twenty-five (25) hours per week during that 180-day period (unless the leave is to care for a newborn child or newly placed foster or adopted child, in which case the weekly hour requirement is inapplicable)*; and
3) Be employed by an employer with at least twenty-five (25) employees in Oregon (including part-time employees and employees on leave) during each working day of twenty (20) or more calendar workweeks in the year in which the leave will be taken, or in the preceding year.

*****In the event of a public health emergency, employees who have worked for the Company for at least 30 days and averaged 25 hours per week during that 30-day period are eligible to take leave for any OFLA-covered reason.

An employee who separates from employment with the Company, irrespective of any reason, remains eligible for OFLA leave upon rehire if the employee: (i) is eligible to take OFLA leave at the time the employee separates; and (ii) is reemployed by the Company within 180 days of separation from employment. Additionally, an employee who has a temporary cessation of scheduled hours remains eligible for OFLA leave if the employee: (i) is eligible to take OFLA leave at the beginning of a temporary cessation of scheduled hours of 180 days or less; and (ii) returns to work at the end of the temporary cessation of scheduled hours of 180 days or less. Any OFLA leave taken by the employee within any one-year period continues to count against the length of time of OFLA leave the employee is entitled. The amount of time that an employee is deemed to have worked for the Company prior to a break in service due to a separation

from employment or a temporary cessation of scheduled hours will be restored to the employee when the employee is reemployed by the Company within 180 days of separation from employment or when the employee returns to work at the end of the temporary cessation of scheduled hours of 180 days or less.

Reasons for Leave. OFLA leave may be taken:

1) For the employee's own serious health condition, including pregnancy related conditions;
2) For the serious health condition of the employee's family member;
3) To care for or bond with a newborn, newly adopted, or newly placed foster child ("parental leave");
4) For the non-serious health condition of a child requiring home care or who requires home care due to the closure of the child's school or child care provider as a result of a public health emergency ("sick child leave"); and
5) To deal with the death of a family member by (i) attending the funeral (or alternative) of the family member; (ii) making arrangements necessitated by the death of a family member; or (iii) grieving the death of a family member.

For purposes of OFLA leave, "family member" includes a spouse; parent; parent-in-law; grandparents; grandchildren; biological, adopted or foster children; and a same sex domestic partner (and the parent or child of a same-sex domestic partner).

For purposes of OFLA leave, a "serious health condition" means: (a) an illness, injury, impairment or physical or mental condition that requires inpatient care in a hospital, hospice or residential medical care facility; (b) an illness, disease or condition that in the medical judgment of the treating health care provider poses an imminent danger of death, is terminal in prognosis with a reasonable possibility of death in the near future, or requires constant care; (c) any period of disability due to pregnancy, or period of absence for prenatal care; or (d) any period of absence for the donation of a body part, organ or tissue, including preoperative or diagnostic services, surgery, post-operative treatment and recovery.

Length of Leave. Under the OFLA, eligible employees are entitled to a maximum of twelve (12) weeks leave per year, subject to the following exceptions:

1) A birthing employee who takes leave for a pregnancy-related disability (including routine prenatal care) may take up to an additional twelve (12) weeks for any OFLA-qualifying purpose; and
2) Employees who use a full twelve (12) weeks of "parental leave" may use up to twelve (12) additional weeks in the same leave year for "sick child leave."

Two family members working for the same employer are permitted to each take up to twelve (12) weeks of parental leave, but in some situations may be required to stagger the leave. An eligible employee is entitled to take a maximum of two weeks of leave per death of a family member, up to a maximum of twelve (12) weeks per leave year. The leave must be completed within sixty (60) days after the date on which the employee receives notice of the death of the family member.

Intermittent Leave. Under the OFLA, intermittent leave is permitted for the employee's or family member's serious medical condition, including pregnancy and prenatal care, as well as sick child leave (used for non-serious conditions). Intermittent leave is not available for parental leave (care for or bond with new child). Where applicable, intermittent leave may be taken in the shortest increments used by the Company to track absences.

Employee Responsibilities. For purposes of OFLA leave, the Company will not require medical verification for parental leave, the death of a family member or if the leave is taken to care for a child who requires home care due to the closure of the child's school or childcare provider as a result of a public health emergency. The Company may request verification for the need for leave to care for a child who requires home care due to the closure of the child's school or child care provider as a result of a public health emergency. A request for verification may include a request for: (i) the name of the child requiring home care; (ii) the name of the school or child care provider that is subject to closure; (iii) a statement from the employee that no other family member of the child is willing and able to care for the child; and (iv) a statement that special circumstances exist that require the employee to provide home care for the child during the day, if the child is older than 14 years of age.

Restoration of Employment and Benefits. At the end of OFLA leave, subject to some exceptions, employees generally must be restored to the position held prior to leave. If an employee's original position has been eliminated, the employee will be returned to an equivalent position with equivalent pay, benefits and other terms. There is no key employee exception under the OFLA.

Oregon Paid Family and Medical Leave

Eligibility Requirements. Eligible Oregon employees may apply for paid family leave, medical leave, or safe leave (collectively "PFML"). Eligibility for PFML and the amount of benefits is determined by statute and the Oregon Employment Department ("OED"), not the Company. Currently, employees who earned at least $1,000 in wages in the base year and paid program contributions during the base year are eligible. All employees are required to contribute to the Paid Leave Oregon Fund and will be subject to payroll deductions not to exceed the maximum rate established by law.

Entitlement. All eligible employees who meet the statutory contribution requirements are entitled to initiate a claim with OED and, if the claim is approved, to receive PFML. PFML benefits are available for up to twelve (12) weeks per benefit year (as determined by OED) for any of the following purposes, in any combination:

1) To care for and bond with a child during the first year after the child's birth or arrival through adoption or foster care placement ("Family leave");
2) To care for a family member who has a serious health condition ("Family leave");
3) For an employee's own serious health condition ("Medical leave"); or
4) For an employee who is the victim of domestic violence, harassment, sexual

assault or stalking or is the parent or guardian of a minor child or dependent who is a victim of domestic violence, harassment, sexual assault or stalking to seek, on the employee's behalf or on behalf of employee's minor child or dependent, legal, medical, mental health, victim services, or law enforcement assistance or remedies related to domestic violence, harassment, sexual assault or stalking ("Safe leave").

Any employee who takes any amount of paid leave under this policy as set forth above is entitled to take up to 16 weeks of leave in the benefit year for any covered reason and in any combination of paid leave (not to exceed 12 weeks and as determined by OED) and unpaid leave for any purpose under OFLA, to the extent the employee is eligible for OFLA leave. Refer to the Company's OFLA Policy for additional information. In addition, an employee may be eligible for an additional up to two weeks of paid leave for a birthing parent (as determined by OED) for limitations related to pregnancy, childbirth, or a related medical condition, including but not limited to lactation, for a total amount of leave, not to exceed 18 weeks per benefit year.

"Family member," for purposes of this policy includes an employee's spouse or domestic partner, a child (biological, adopted, stepchild, or foster child) of the employee or the employee's spouse or domestic partner, a parent (biological, adoptive, stepparent, foster parent, or legal guardian) of the employee or the employee's spouse or domestic partner, a sibling or stepsibling of the employee or the sibling's or stepsibling's spouse or domestic partner, a grandparent of the employee or the grandparent's spouse or domestic partner, a grandchild of the employee or the grandchild's spouse or domestic partner, or any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.

Benefits under this policy are in addition to any paid sick time available under Oregon law or the Company's sick time, vacation, and other paid time off policies. PFML benefits are not available for any week in which an employee is eligible to receive workers' compensation or unemployment benefits.

Use of PFML. An employee does not need to use this PFML entitlement in one block. In general, PFML benefits may be claimed for leave that is taken in increments equivalent to one workday or one work week.

Filing Claims with OED. To submit a claim for benefits, employees should visit paidleave.oregon.gov or request a paper application from OED. For additional information please visit https://www.oregon.gov/employ/PFMLI/Pages/default.aspx. If an employee's PFML claim is denied, OED will issue a decision explaining the reasons for the denial. Employees may request reconsideration and/or appeal OED's decision denying benefits by following the procedures adopted by OED. OED is solely responsible for determining if an employee is eligible for benefits.

Employee Notice to the Company. Employees must provide notice, including an explanation of the need for leave, to Human Resources before commencing a period of PFML. Any health information submitted to the Company for purposes of PFML or any

other purpose will be kept confidential in accordance with applicable law. When the PFML absence is foreseeable, employees must provide written notice at least 30 days before commencing a period of PFML leave. If the reasons for taking PFML are not foreseeable, the employee must provide oral notice within 24 hours of commencing leave and must provide written notice within three days after commencing leave. If the employee is unable to provide oral notice personally, notice may be provided by another responsible party, such as the em¬ployee's spouse, neighbor, or coworker. Failure to provide notice as required may result in a reduction of PFML benefits, in addition to other discipline up to and including termination.

Interaction with Other Leave Policies. Leave taken pursuant to PFML will run concurrently with leave taken under other applicable state and federal leave laws, including without limitation the Oregon Family Leave Act and the federal Family and Medical Leave Act of 1993, when the leave is for a qualified reason under those laws.

Job Benefits & Protection. An employee taking PFML will retain their benefits and seniority status during the period of leave. During PFML leave, the Company will maintain health coverage under any employment-related health insurance on the same terms and conditions as if the employee had continued to work. The employee must make arrangements with Human Resources prior to taking leave to pay their portion of any applicable health insurance premiums each month.

Any leave taken pursuant to this policy will be considered an excused leave of absence and will not count for purposes of considering an employee's attendance under the Company's absence control policies. Employees who have worked for the Company for at least 90 days before commencing PFML will be returned to the same position they held at the commencement of leave, unless that position was eliminated during the leave. In the event the employee's position is eliminated, the employee will be returned to an available equivalent position. Otherwise, employees taking PFML are not guaranteed job reinstatement unless they qualify for such reinstatement under federal and/or state leave laws or other applicable laws.

Questions and/or Complaints about PFML Leave. If you have questions regarding this PFML policy, please contact Human Resources. For questions about determinations by OED on leave eligibility, entitlement, and/or benefits, please contact OED directly. The Company is committed to complying with the PFML and, whenever necessary, shall interpret and apply this policy in a manner consistent with the PFML.

The PFML makes it unlawful for employers to discriminate, retaliate, threaten to retaliate or interfere with the exercise of any rights under the PFML. In addition, employers may not retaliate or threaten to retaliate against any person who has filed a complaint, has caused a complaint to be filed, has or will participate or testify in proceeding relating to a violation of the PFML, or has given or is about to give information connected to a proceeding relating to a violation of the PFML. If employees believe their PFML rights have been violated, they should contact Human Resources immediately. The Company will investigate any PFML complaints and take prompt and appropriate remedial action

to address and/or remedy any PFML violation. Employees also may file PFML complaints with the Department alleging PFML violations.

For additional information regarding your rights, visit https://paidleave.oregon.gov/DocumentsForms/Paid-Leave-ModelNotice-Poster-EN.pdf

Updated 9.1.23

PENNSYLVANIA SUPPLEMENT

About This Pennsylvania Supplement

Creative Circle ("the Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Pennsylvania employees will receive the Company's national handbook ("Handbook") and the Pennsylvania Supplement to the Handbook ("Pennsylvania Supplement") (together, the "Employee Handbook").

The Pennsylvania Supplement applies only to Pennsylvania employees. It is intended as a resource containing specific provisions derived under Pennsylvania law that apply to the employee's employment. It should be read together with the National Handbook and, to the extent that the policies in the Pennsylvania Supplement are different from, or more generous than those in the Handbook, the policies in the Pennsylvania Supplement will apply.

The Pennsylvania Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Philadelphia Wage Theft Ordinance Notice

Employees who perform work in Philadelphia or entered into an employment contract in Philadelphia and believe they have not been paid for all of the wages they have earned may file a complaint for unpaid wages pursuant to the Philadelphia Wage Theft Ordinance. Retaliation against an employee who files such a complaint is prohibited.

City of Philadelphia Paid Sick Time

The Company provides eligible employees with paid sick time in accordance with the requirements of the Philadelphia Promoting Healthy Families and Workplaces Ordinance (PHFWO). For employees who work in Philadelphia who are eligible for sick leave under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Eligibility

Employees who work at least 40 hours per calendar year in the City of Philadelphia (excluding: independent contractors, seasonal workers, employees hired for a term of less than six months, employees covered by a bona fide collective bargaining agreement, interns, adjunct professors and pool employees) are eligible to accrue paid sick time.

Accrual of Sick Time

Employees begin accruing paid sick time pursuant to this policy at the start of employment. Eligible employees will accrue one hour for every 40 hours worked in Philadelphia, up to a maximum accrual of 40 hours in a calendar year. Salaried exempt employees will be assumed to work 40 hours in a week unless the employee's regular work week is less than 40 hours, in which case sick time accrues based upon that regular workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Use of Paid Sick Time

Eligible employees may use sick time for the following reasons:

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

- Care of a family member with a mental or physical illness, injury or health condition; care of a family member who needs medical diagnosis, care or treatment of a mental or physical illness, injury or health condition; or care of a family member who needs preventive medical care; or

- Absence due to domestic abuse, sexual assault or stalking, provided the leave is to allow the employee to obtain for the employee or the employee's family member:
    - Medical attention;
    - Services from a victim services organization;
    - Psychological or other counseling;
    - Relocation; or
    - Legal services or remedies (e.g., preparing for or participating in a civil or criminal legal proceeding).

For purposes of this policy, a “family member” includes a biological, adopted or foster child, stepchild or legal ward or a child to whom the employee stands in loco parentis; a biological, foster, stepparent or adoptive parent or legal guardian of an employee or an employee’s spouse or a person who stood in loco parentis when the employee was a minor child; a person to whom the employee is legally married under the laws of Pennsylvania; a grandparent or spouse of a grandparent; a grandchild; a biological, foster, or adopted sibling or spouse of a biological, foster or adopted sibling; and a life partner as defined under the Philadelphia Code.

Eligible employees may not use accrued paid sick time until the employee's 90th calendar day of employment.

Paid sick time may be used in one-quarter hour increments. Eligible employees may use up to 40 hours of paid sick time in any calendar year.

Requesting Sick Time/Documentation

When the need for sick time is foreseeable, employees must provide reasonable advance notice, either orally or in writing, of the need for sick leave and must make a reasonable effort to schedule sick time in a manner that does not unduly disrupt Company operations. For all other absences, employees must notify the Company before the start of their scheduled work hours, or as soon as practicable if the need arises immediately before or after the employee has reported for work. When possible, an employee's request for sick time must include the expected duration of the sick leave. To provide notice of the need to use sick time, employees should contact their Human Resources representative.

If sick time is for more than two consecutive work days, the Company may request that employees provide reasonable documentation that the sick time is being used for a permissible purpose. For absences due to the purposes described in (1) and (2) above, documentation signed by a heath care professional indicating that sick time is necessary will be considered reasonable documentation. For absences due to the purposes described in (3), documentation signed by a health care professional; a police report indicating that the employee was a victim of domestic abuse, stalking or sexual assault; a court order; or a signed statement from a representative of a victim services organization affirming that the employee was a victim of domestic abuse, stalking or sexual assault will be considered reasonable documentation. The required documentation need not explain the nature of the illness or the details of the violence.

Payment

Paid sick time will be paid at the same rate as the employee earns from the employee's employment at the time the employee uses such time, unless otherwise required by applicable law. Use of paid sick time is not considered hours worked for purposes of calculating overtime.

Leave Carryover

Employees who have accrued time remaining at the end of the year may carry over the accrued and unused time to the next calendar year. However, employees may not use more than 40 hours of sick time in a calendar year.

The Company does not offer pay in lieu of actual sick time. Accrued but unused paid sick time under this policy will not be paid at separation

Effect on Other Rights and Policies

The Company may provide other forms of leave for employees to care for medical conditions or leave related to domestic abuse, sexual assault or stalking under certain federal, state and local laws. In certain situations, leave under this policy may run at the same time as leave available under another federal, state or local law, provided eligibility requirements for that law are met. The Company is committed to complying with all applicable laws. Employees should contact their Human Resources representative for information about other federal, state and local medical, family or domestic abuse victim leave rights.

Separation from Employment

Compensation for accrued and unused paid sick time is not provided upon separation from employment for any reason.

Retaliation

The Company prohibits discrimination and/or retaliation against employees who request or use sick time for authorized circumstances protected by law, and against employees who file a complaint about an alleged violation of this policy, or inform others about their rights under this policy. Employees may file a complaint or bring a civil action if sick time as required by law is denied the employee or if the employee is retaliated against for requesting or taking sick time.

Confidentiality

The Company will, in accordance with applicable federal and state law, treat as confidential health information or information pertaining to domestic abuse, sexual assault or stalking about an employee or employee's family member. Such information will not be released without the employee's express permission, unless otherwise required by law.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Pittsburgh Pregnancy Accommodations

In compliance with the Pittsburgh City Code, the Company will not discriminate against an employee because of pregnancy, childbirth, or related medical conditions and events. The Company will endeavor to reasonably accommodate an employee affected by pregnancy, childbirth, or related medical conditions as well as an employee who is the partner of a person who is pregnant or affected by a related medical condition in order to allow the employee to perform the essential duties of their job unless doing so will impose an undue hardship on the Company's business. Such accommodations may include, but are not limited to, modifications or adjustments to an employee's work station, including seating accommodations; work schedule modifications, including additional water, bathroom, rest and lactation-related breaks; modified job requirements or job reassignment, including light duty work; or providing unpaid leave.

Any employee who needs to request an accommodation due to pregnancy, childbirth, or a related medical condition should contact Human Resources. If an employee who has requested an accommodation has not received an initial response within five (5) business days, the employee should contact their Human Resources leader.

After receiving a request for an accommodation due to pregnancy, childbirth, or a related medical condition or otherwise becoming aware that an employee requires such an accommodation, the Company will engage in an interactive process with the employee. Even if an employee has not formally requested an accommodation, the Company may initiate an interactive process under certain circumstances, such as when the Company has knowledge that an employee's performance at work has been negatively affected and a reasonable basis to believe that the issue is related to the employee's or their partner's pregnancy, childbirth, or related medical condition, in compliance with applicable law.

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

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

At the conclusion of the interactive process, the Company will provide written notice to the employee in a timely manner indicating that the Company:

1) will be able to offer and provide a reasonable accommodation,
2) will not be able to provide a reasonable accommodation to the employee because there is no accommodation available that will not cause an undue hardship on the Company's operations, or
3) will not be able to provide a reasonable accommodation to the employee because no accommodation exists that will allow the employee to perform the essential requisites of the job.

The Company will not retaliate or take any adverse employment action against an employee because the employee has requested a reasonable accommodation under this policy, opposed a discriminatory act prohibited by the Code, made a complaint of discrimination under the Code; or testified or otherwise assisted or participated in an investigation by or proceeding before the Pittsburgh Commission on Human Relations.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Allegheny County Paid Sick Time

Eligibility. The Company provides paid sick time to employees who work in the County of Allegheny for at least 35 hours in the calendar year in accordance with Article XXIV ("Paid Sick Days") of the Allegheny County Health Department Rules and Regulation (the "Ordinance"). For employees who work in the County of Allegheny who are eligible for sick time under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick time pursuant to this policy the start of employment. Employees accrue one (1) hour for every thirty-five (35) hours worked, up to a maximum accrual of forty (40) hours each calendar year and an overall accrual cap of forty (40) hours at any time. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid sick time accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may use paid sick time beginning on the 90th calendar day following commencement of employment. Paid sick time may be used in in the smaller of hourly increments or the smallest increment that the Company's payroll system uses to account for absences or use of other time. An employee may not use more than forty (40) hours of paid sick time in any calendar year.

Employees may use paid sick time for absences due to:

1) An employee's mental or physical illness, injury or health condition; an employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; an employee's need for preventive medical care;
2) Care of a family member with a mental or physical illness, injury or health condition; care of a family member who needs medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; care of a family member who needs preventive medical care; or
3) Closure of the employee's place of business by order of a public official due to a public health emergency or an employee's need to care for a child whose school or place of care has been closed by order of a public official due to a public health emergency, or care for a family member when it has been determined by the health

authorities having jurisdiction or by a health care provider that the family member's presence in the community would jeopardize the health of others because of the family member's exposure to a communicable disease, whether or not the family member has actually contracted the communicable disease.

For purposes of this policy, family member includes: a biological, adopted or foster child, stepchild or legal ward, a child of a domestic partner, or a child to whom the employee stands in loco parentis; a biological, foster, adoptive, or step-parent, or legal guardian of an employee or an employee's spouse or domestic partner or a person who stood in loco parentis when the employee was a minor child; a person to whom the employee is legally married under the laws of any state;
a grandparent or spouse or domestic partner of a grandparent; grandchild; a biological, foster, or adopted sibling; a domestic partner; or any individual for whom the employee has received permission from the employer to care for at the time of the employee's request to make use of paid sick time.

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

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick time for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick time available.

Notice & Documentation. Requests to use paid sick time may be made orally, in writing, or electronically (e.g., via email), and whenever possible, the request must include the expected duration of the employee's absence. When the use of paid sick time is foreseeable, the employee is required to make a good faith effort to provide notice of the need for such time to their manager or supervisor seven (7) days in advance of the use of the paid sick time or as early as possible under the circumstances and make a reasonable effort to schedule the use of earned paid sick time in a manner that does not unduly disrupt the Company's operations. When the use of earned sick time is not foreseeable, the employee is required to provide notice to their manager or supervisor at least one (1) hour prior to the start of the employee's workday or as soon as possible under the circumstances.

For paid sick time of three (3) or more full consecutive days, the Company may require reasonable documentation that the paid sick time has been used for a covered purpose. Documentation signed by a health care professional indicating that sick time is necessary shall be considered reasonable documentation. Documentation provided to the Company should not explain the nature of the employee's or a family member's illness or health condition.

Payment. Paid sick time will be paid at the same base rate of pay and with the same benefits, including health care benefits, as an employee would have earned at the time of their use of the paid sick time, but no less than the applicable minimum wage, unless

otherwise required by applicable law. Use of paid sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused paid sick time to the following calendar year. Unused paid sick time will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliation or discrimination against an employee because the employee has exercised rights protected under the Ordinance. Such rights include but are not limited to the right to use sick time pursuant to the Ordinance; the right to file a complaint with a Department or other County Agency designated by the Allegheny County Manager to effectuate the provisions of the Ordinance or court; the right to inform any person about any employer's alleged violations of the Ordinance; and the right to inform any person of the employee's potential rights under the Ordinance. Employees may file a complaint if sick time is denied or if they are subjected to retaliation for requesting or taking sick time.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Pittsburgh Paid Sick Time (For Employees Also Covered under the Allegheny County Paid Sick Time Ordinance).

Eligibility. The Company provides paid sick time to employees who work in the City of Pittsburgh for at least thirty-five (35) hours in a calendar year in accordance with the Paid Sick Days Act (the "Ordinance") and the County of Allegheny in accordance with Article XXIV ("Paid Sick Days") of the Allegheny County Health Department Rules and Regulation (the "County Ordinance"). For employees who work in the City of Pittsburgh who are eligible for sick time under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing paid sick time pursuant to this policy at the start of employment. Employees accrue one (1) hour for every thirty five (35) hours worked, up to a maximum accrual of forty (40) hours each calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case paid sick time accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may use paid sick time on the 90th calendar day following commencement of employment. Paid sick time may be used in in the smaller of hourly increments or the smallest increment that the Company's payroll system uses to account for absences or use of other time. An employee may not use more than forty (40) hours of paid sick time in any calendar year.

Employees may use paid sick time for absences due to:

4) An employee's mental or physical illness, injury or health condition; an employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; an employee's need for preventive medical care;
5) Care of a family member with a mental or physical illness, injury or health condition; care of a family member who needs medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; care of a family member who needs preventive medical care; or
6) Closure of the employee's place of business by order of a public official due to a public health emergency or an employee's need to care for a child whose school or place of care has been closed by order of a public official due to a public health emergency, or care for a family member when it has been determined by the health authorities having jurisdiction or by a health care provider that the family member's presence in the community may jeopardize the health of others because of the family member's exposure to a communicable disease, whether or not the family member has actually contracted the communicable disease.

For purposes of this policy, family member includes: a biological, adopted or foster child, stepchild or legal ward, a child of a domestic partner, or a child to whom the employee stands in loco parentis; a biological, foster, stepparent or adoptive parent or legal guardian of an employee or an employee's spouse or domestic partner or a person who stood in loco parentis when the employee was a minor child; a person to whom the employee is legally married under the laws of any state; a grandparent or spouse or domestic partner of a grandparent; a grandchild; a biological, foster or adopted sibling; a domestic partner; or any individual for whom the employee has received oral permission from the employer to care for at the time of the employee's request to make use of sick time.

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

Unless the employee advises the Company otherwise, we will assume, subject to applicable law, that employees want to use available paid sick time for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick time available.

Notice & Documentation. Requests to use paid sick time may be made orally, in writing, or electronically (e.g., via email), and whenever possible, the request must include the expected duration of the employee's absence. When the use of paid sick time is foreseeable, the employee is required to make a good faith effort to provide notice of the need for such time to their supervisor or manager seven (7) days in advance of the use of the paid sick time or as early as possible under the circumstances and make a reasonable effort to schedule the use of earned paid sick time in a manner that does not unduly disrupt the Company's operations. When the use of earned sick time is not foreseeable, the employee is required to provide notice to their supervisor or manager at least one (1) hour prior to the start of the employee's workday or as soon as possible

under the circumstances.

For paid sick time of three (3) or more full consecutive days, the Company may require reasonable documentation that the paid sick time has been used for a covered purpose. Documentation signed by a health care professional indicating that sick time is necessary shall be considered reasonable documentation. Documentation provided to the Company should not explain the nature of the employee's or a family member's illness or health condition.

Payment. Paid sick time will be paid at the same base rate of pay and with the same benefits, including health care benefits, as an employee would have earned at the time of their use of the paid sick time, but no less than the applicable minimum wage, unless otherwise required by applicable law. Use of paid sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over up to forty (40) hours of accrued, unused paid sick time to the following calendar year. Unused paid sick time will not be paid at separation.

Enforcement & Retaliation. The Company prohibits retaliation or discrimination against an employee because the employee has exercised rights protected under the Ordinance or County Ordinance. Such rights include but are not limited to the right to use sick time pursuant to the Ordinance and County Ordinance; the right to file a complaint with the Mayor's Office of Equity or the Department or other County Agency designated by the Allegheny County Manager to effectuate the provisions of the County Ordinance or court; the right to inform any person about any employer's alleged violations of this Ordinance or County Ordinance; and the right to inform any person of their potential rights under the Ordinance or County Ordinance. Employees may file a complaint if sick time is denied or if they are subjected to retaliation for requesting or taking sick time.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Reviewed 1.1.24

RHODE ISLAND SUPPLEMENT

About This Rhode Island Supplement

Creative Circle is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Rhode Island employees will receive the Company's national handbook ("Handbook") and the Rhode Island Supplement to the Handbook ("Rhode Island Supplement") (together, the "Employee Handbook").

The Rhode Island Supplement applies only to Rhode Island employees. It is intended as a resource containing specific provisions derived under Rhode Island law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Rhode Island Supplement are different from or more generous than those in the Handbook, the policies in the Rhode Island Supplement will apply.

The Rhode Island Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have questions about any of these policies below, they should contact their Human Resources representative.

GENERAL EMPLOYMENT PRACTICES

Whistleblower Protections

Employees have the right under the Rhode Island Whistleblowers' Protection Act to complain of workplace practices or policies that they believe to be in violation of law, against public policy and/or fraudulent or unethical.

The Company will not take any adverse employment action or otherwise retaliate against any employee (or a person acting on behalf of the employee) who:

- Reports (or is about to report) to the employee's supervisor or a public body a violation of law, regulation or rule promulgated under the law, which the employee knows or reasonably believes has occurred or is about to occur;
- Is requested by a public body to testify or participate in an investigation, hearing or inquiry held by the public body or in a court action; or
- Refuses to violate or assist in violating federal, state or local law, rule or regulation.

Employees who wish to report such violations should contact Human Resources, the anonymous toll-free hotline or any of the other contacts listed in the Handbook's Reporting and Anti-Retaliation Policy. Employees should also consult the Reporting and Anti-Retaliation Policy set forth in the Handbook for further information about reporting potential misconduct and protections from retaliation

Supplemental Policy regarding Sexual and Other Unlawful Harassment

The Company complies with Rhode Island law and maintains a strict policy prohibiting sexual harassment and harassment against employees or applicants for employment based on race, color, religion, sex (including pregnancy, childbirth or related medical conditions), country of ancestral origin, disability, age (40 and over), sexual orientation, gender identity or expression, homelessness, genetic information, HIV/AIDS status, lawful use of tobacco products outside of the workplace, military/reservist status and any other category protected under applicable federal, state or local law.

While the Sexual and Other Unlawful Harassment policy in the main Handbook sets forth the Company's goals of promoting a workplace that is free of harassment, the policy is not designed or intended to limit the Company's authority to discipline or take remedial action for workplace conduct that we deem unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment.

Sexual harassment in the workplace is unlawful. It is also unlawful to retaliate against an employee for filing a complaint of harassment, including a complaint of sexual harassment, or for cooperating in an investigation of a complaint for harassment, including sexual harassment.

Any employee who believes that they have been harassed or discriminated against should provide a written or verbal report to their supervisor, another member of management, or to Human Resources as soon as possible. The responsibility to investigate complaints of harassment has been assigned to Human Resources.

Employees who believe they have been harassed or discriminated against may also file a formal complaint with either or both of the government agencies listed below:

- The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment complaints, including claims of sexual harassment. The EEOC can be reached at:

  John F. Kennedy Federal Building
  475 Government Center
  Boston, MA 02203
  Tel: 800-669-4000
  Fax: 617-565-3196
  TTY: 800-669-6820

- The Rhode Island Commission for Human Rights (RICHR) is the state agency responsible for handling complaints of harassment, including sexual harassment. The RICHR can be reached at:

  180 Westminster Street, 3rd Floor
  Providence, RI 02903
  Tel: 401-222-2661
  Fax: 401-222-2616
  TTY: 401-222-2664

Pregnancy Accommodations

The Company will not discriminate against an employee in relation to pregnancy, childbirth and related conditions.

The Company will endeavor to provide reasonable accommodations for conditions related to pregnancy, childbirth or related conditions, unless the accommodation would pose an undue hardship on the Company's business. Such accommodations include, but are not limited to: more frequent or longer breaks; time off to recover from childbirth; acquisition or modification of equipment or seating; temporary transfer to a less strenuous or hazardous position; job restructuring; light duty; assistance with manual labor; break time and private non-bathroom space for expressing breast milk; or modified work schedules.

The Company will not require an individual with a need related to pregnancy, childbirth, or a related medical condition to accept an accommodation that the individual chooses not to accept. This includes, but is not limited to taking leave if another reasonable accommodation can be provided to an employee's condition related to the pregnancy, childbirth, or a related medical condition.

The Company will not deny employment opportunities to an employee or prospective employee, if such denial is based on the Company's inability to reasonably accommodate an employee's or prospective employee's condition related to pregnancy, childbirth, or a related medical condition.

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

Rhode Island Paid Sick and Safe Leave

Eligibility. This Company provides paid sick and safe leave time ("PSSL") to employees in Rhode Island. For employees whose primary place of work is in Rhode Island and are eligible for paid time off under a general paid time off policy or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing PSSL pursuant to this policy at the start of

employment. Employees accrue one hour of PSSL for every thirty-five (35) hours worked and all hours paid by the Company while collecting paid time off benefits, including, but not limited to holiday pay, personal time, sick time and vacation time, up to a maximum of forty (40) hours per calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case PSSL accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees, other than temporary employees, may begin using PSSL on the 90th calendar day of employment. Temporary Employees may begin using PSSL on the 180th calendar day of employment. Paid sick time may be used in one-quarter hour increments. An employee may not use more than forty (40) hours of PSSL in a calendar year.

Employees may use PSSL for:

1) An employee's mental or physical illness, injury or health condition; an employee's need for medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; an employee's need for preventive medical care;
2) Care of an employee's family member with a mental or physical illness, injury or health condition; care of a family member who needs medical diagnosis, care, or treatment of a mental or physical illness, injury or health condition; care of a family member who needs preventive medical care;
3) Closure of the employee's place of business by order of a public official due to a public health emergency or an employee's need to care for a child whose school or place of care has been closed by order of a public official due to a public health emergency, or care for oneself or a family member when it has been determined by the health authorities having jurisdiction or by a health care provider that the employee's or family member's presence in the community may jeopardize the health of others because of their exposure to a communicable disease, whether or not the employee or family member has actually contracted the communicable disease; or
4) Time off needed when the employee or an employee's family member is a victim of domestic violence, sexual assault or stalking.

For purposes of this policy, family member includes: a child; parent (including a biological, foster, or adoptive parent, a stepparent, a legal guardian, or other person who stands in loco parentis to the employee or the employee's spouse or domestic partner when they were a child); spouse; parent-in-law, grandparent, grandchild, domestic partner, sibling, care recipient, or other member of the employee's household (person that resides at the same physical address as the employee or a person that is claimed as a dependent by the employee for federal income tax purposes).

An employee's use of PSSL will not be conditioned upon searching for or finding a replacement worker.

Notice & Documentation. When the use of PSSL is foreseeable, employees are required to make a reasonable effort to schedule the use of PSSL in a manner that does not unduly disrupt the Company's operations. When the use of PSSL is not foreseeable, the employee must notify the Company before the start of their scheduled work hours, or as soon as practicable if the need arises immediately before or after the employee has reported for work. To provide notice of the need to use sick time, employees should contact their Human Resources representative.

For PSSL of more than three (3) consecutive work days, the Company requires reasonable documentation that the PSSL has been used for a covered purpose. For reason #1 and #2 above, documentation signed by a heath care professional indicating that PSSL is necessary is reasonable, but should not explain the nature of the employee's or a family member's health condition or the details of the domestic violence, sexual violence, abuse or stalking. For reason #4 above, any of the following types of documentation selected by the employee are reasonable:

1) An employee's written statement that the employee or the employee's family member is a victim of domestic violence, sexual assault, or stalking and that the leave taken was for one of the purposes in reason #4 above.
2) A police report indicating that the employee or employee's family member was a victim of domestic violence, sexual assault, or stalking;
3) A court document indicating that the employee or employee's family member is involved in legal action related to domestic violence, sexual assault, or stalking; or
4) A signed statement from a victim and witness advocate affirming that the employee or employee's family member is receiving services from a victim services organization or is involved in legal action related to domestic violence, sexual assault, or stalking.

An employee is not required to provide documentation to the Company if it would result in an unreasonable burden or expense, or exceed privacy or verification requirements otherwise established by law.

PSSL may not be used as an excuse to be late for work without an authorized purpose. If an employee is committing fraud or abuse by engaging in an activity that is not consistent with allowable purposes for PSSL, the employee will be disciplined, up to and including termination of employment for misuse of PSSL.

If an employee is exhibiting a clear pattern of taking leave on days just before or after a weekend, vacation, or holiday, the Company may discipline the employee for misuse of PSSL, unless the employee provides reasonable documentation that the PSSL has been used for a purpose listed above.

Employees must provide written documentation for an employee's use of PSSL that occurs within two (2) weeks prior to an employee's final scheduled day of work before termination of employment.

Payment. PSSL will be paid at the same hourly rate and with the same benefits, including health care benefits, as the employee normally earns during hours worked, but no less than the applicable minimum wage.

Carryover & Payout. An employee may carry over accrued, unused PSSL to the following calendar year. Unused PSSL will not be paid at separation.

Enforcement & Retaliation. Retaliation or discrimination against an employee who requests PSSL or uses PSSL, or both, is prohibited, and employees may file a complaint with the Rhode Island Department of Labor and Training against an employer who retaliates or discriminates against the employee.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Paid Temporary Caregiver Insurance Benefits & Leave

An employee may be eligible for up to six (6) weeks of caregiver leave and temporary caregiver benefits within any 52-week period to care for a seriously ill child, spouse, domestic partner, parent, parent-in-law, or grandparent or to bond with a newborn child, new adopted child, or new foster-care child. Temporary caregiver benefits are available through the Rhode Island "Temporary Caregiver Insurance" ("TCI") program, which is administered by the Rhode Island Department of Labor and Training ("DLT"). Temporary caregiver benefits only are available to an employee exercising their right to take a leave while covered by the TCI program. These benefits are financed solely through employee contributions to the TCI program. That program is solely responsible for determining if an employee is eligible for such benefits.

An employee may be eligible for temporary caregiver benefits for any week in which they are unable to perform their regular and customary work because they are (1) bonding with a newborn child or a child newly placed for adoption or foster care with the employee or domestic partner (available during the first twelve (12) months of parenting only); or (2) caring for a child, a parent, parent-in-law, grandparent, spouse, or domestic partner, who has a serious health condition, subject to a waiting period.

Employees may use accrued paid time off during any eligibility waiting period.

An employee must file a written intent with the Company with a minimum of thirty (30) days' notice prior to commencement of the caregiver leave. Failure by the employee to provide the written intent may result in delay or reduction in the claimant's benefits, except in the event the time of the leave is unforeseeable or the time of the leave changes for unforeseeable circumstances.

An individual who exercises their right to leave covered by the temporary caregiver insurance program must file a certificate form with the DLT containing all information required by the DLT. For leave for reason of caring for a seriously ill family member, an employee must file a certificate with the DLT that must contain:

1) A diagnosis and diagnostic code prescribed in the international classification of diseases, or where no diagnosis has yet been obtained, a detailed statement of symptoms;
2) The date if known, on which the condition commenced;
3) The probable duration of the condition;
4) An estimate of the amount of time that the licensed qualified health care provider believes the employee is needed to care for the family member;
5) A statement that the serious health condition warrants the participation of the employee to provide care for the employee's family member. "Warrants the participation of the employee" includes, but is not limited to, providing psychological comfort, arranging third-party care for the family member as well as directly providing, or participating in the medical and physical care of the patient; and
6) A certificate filed to establish medical eligibility of the serious health condition of the employee's family member will be made by the family member's treating licensed qualified heath care provider.

In the case of a parent, or persons who are in loco parentis caring for the serious health condition of a foster care child, the employee must submit all required information, with a written request to the department of children, youth and families for the release of medical information by the child's treating licensed qualified health care provider. The department of children, youth and families will transmit the requested medical information, pending all properly submitted forms, to the DLT, within ten (10) business days of request. In the absence of the requested transmitted medical information by the department of children, youth and families within ten (10) business days, the employee may request the licensed qualified healthcare provider to directly transmit the medical eligibility of the serious health condition to the DLT.

Any employee who exercises their right to leave covered by temporary caregiver insurance will, upon the expiration of that leave, be entitled to be restored by the Company to the position held by the employee when the leave commenced, or to a position with equivalent seniority, status, employment benefits, pay, and other terms and conditions of employment including fringe benefits and service credits that the employee had been entitled to at the commencement of leave.

During any caregiver leave taken pursuant to this policy, the Company will maintain any existing health benefits of the employee in force for the duration of the leave as if the employee had continued in employment continuously from the date the employee commenced the leave until the date the caregiver benefits terminate; provided, however, that the employee will continue to pay any employee shares of the cost of health benefits as required prior to the commencement of the caregiver benefits.

The Company may require an employee who is entitled to leave under the FMLA and/or the RIPFLA, who exercises their right to benefits under the temporary caregiver insurance program, to take any temporary caregiver benefits received, concurrently, with any leave taken pursuant to the FMLA and/or RIPFLA.

Rhode Island Parental and Family Leave (Addendum to FMLA Policy)

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

Eligibility. RIPFLA leave is available to "RIPFLA eligible employees." To be a RIPFLA eligible employee, an employee must have been employed:

1) For at least twelve (12) consecutive months;
2) On a full-time basis for an average of thirty (30) or more hours per week; and
3) By an employer that has fifty (50) or more employees in Rhode Island.

Basic Family and Medical Leave Entitlement. The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons. The RIPFLA provides eligible employees up to thirteen (13) consecutive workweeks of unpaid leave for certain parental and family reasons during a 24-month period. The twelve (12) month FMLA period and the 24-month RIPFLA period is determined based on a rolling period measured backwards from the date the employee's leave will be taken.

In addition to the entitlements outlined in the FMLA policy, under the RIPFLA, leave also may be taken to care for the employee's parent-in-law who has a serious health condition. Unlike FMLA, RIPFLA does not cover leave for certain qualifying exigencies or to care for the employee's child after placement for foster care.

Spouses Employed by the Same Company. Unlike the FMLA, which provides that spouses employed by the same Company are limited to a combined total of twelve (12) workweeks in a 12-month period if the leave is taken for the birth and care of a newborn child, for placement of a child for adoption or foster care, or to care for a parent who has a serious health condition, no such limitation applies to RIPFLA.

Intermittent Leave and Reduced Leave Schedules. Unlike the FMLA, which entitles employees to take FMLA leave intermittently (in separate blocks of time) or on a reduced leave schedule (reducing the usual number of hours the employee works each workday) when medically necessary due to a serious health condition of the employee or covered family member, no such entitlement exists under the RIPFLA.

Restoration of Employment and Benefits. As with FMLA leave, at the end of RIPFLA leave, subject to some exceptions, employees generally have the right to return to the same or equivalent position with equivalent pay, benefits and other terms. There is no key employee exception under the RIPFLA.

Reviewed 1.1.24

SOUTH CAROLINA SUPPLEMENT

About This South Carolina Supplement

Creative Circle (the "Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, South Carolina employees will receive the Company's national handbook ("Handbook") and the South Carolina Supplement to the Handbook ("South Carolina Supplement") (together, the "Employee Handbook").

The South Carolina Supplement applies only to South Carolina employees. It is intended as a resource containing specific provisions derived under South Carolina law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the South Carolina Supplement are different from, or more generous than those in the Handbook, the policies in the South Carolina Supplement will apply.

The South Carolina Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Pregnancy Accommodations

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

Reasonable accommodations may include, but are not limited to:

- making existing facilities readily accessible to and usable by such employees, including acquiring or modifying equipment or devices necessary for performing essential job functions;
- providing more frequent or longer break periods;
- providing more frequent bathroom breaks;
- providing a private place, other than a bathroom stall for the purpose of expressing milk;

- modifying the Company's food or drink policy;
- modifying work schedules;
- providing seating or allowing the employee to sit more frequently;
- providing assistance with manual labor and limits on lifting;
- temporarily transferring an employee to a less strenuous or hazardous vacant position, if qualified; or
- providing job restructuring or light duty, if available.

The Company will not:

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

Updated 1.1.23

TENNESSEE SUPPLEMENT

About This Tennessee Supplement

Creative Circle (the "Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Tennessee employees will receive the Company's national handbook ("Handbook") and the Tennessee Supplement to the Handbook ("Tennessee Supplement") (together, the "Employee Handbook").

The Tennessee Supplement applies only to Tennessee employees. It is intended as a resource containing specific provisions derived under Tennessee law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Tennessee Supplement are different from, or more generous than those in the Handbook, the policies in the Tennessee Supplement will apply.

The Tennessee Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Parental Leave

Employees working in Tennessee for an employer with one hundred (100) or more employees at their job site or location in Tennessee may request a maternity/paternity leave in the event of pregnancy, if the employee has been employed full-time for at least twelve (12) consecutive months. Eligible employees may be absent from employment for a period not to exceed four (4) calendar months for pregnancy, childbirth, and nursing the infant, where applicable (such a period is referred to as "maternity/paternity leave"), or for adoption. With respect to adoptions, the leave period begins with the employee receives custody.

To qualify for this leave, advance notice to the Company is required. The Company must be notified of the anticipated date of departure for maternity/paternity leave, the length of the maternity/paternity leave and the intended date of return to full-time employment. If a medical emergency arises pertaining to an employee's pregnancy, the Company should be notified concerning the intended date of return to full-time employment. Employees who provide three (3) months' notice will be reinstated to the same or similar position after returning from leave. Employees do not forfeit their rights and benefits if they are

prevented from giving three (3) months' notice due to a medical emergency or because notice of the adoption was received fewer than three months in advance.

The Company cannot guarantee that an employee's position will be available if the employee is unable to return to work after the 4-month period. Leave runs concurrently with any other leave provided by the Company to the extent permitted by applicable law. Employees may substitute accrued paid time during unpaid leave under this policy, but this substitution does not extend the length of the leave.

Abusive Conduct Prevention Policy

The Company does not tolerate and prohibits abusive conduct in the workplace. These behaviors are unacceptable in the workplace and in any work-related settings such as business trips and Company sponsored social functions. All employees have the right to be treated with dignity and respect.

Abusive Conduct Defined. Abusive conduct is defined under this policy as acts or omissions that would cause a reasonable person, based on the severity, nature, and frequency of the conduct, to believe that an employee was subject to an abusive work environment, which can include but is not limited to: (i) Repeated verbal abuse in the workplace, including derogatory remarks, insults, and epithets; (ii) Verbal, nonverbal, or physical conduct of a threatening, abusive, violent, intimidating, or humiliating nature in the workplace; or (iii) The sabotage or undermining of an employee's work performance in the workplace.

Abusive conduct does not include: (1) Disciplinary procedures in accordance with adopted Company policies, (2) Routine coaching and counseling, including feedback about and correction of work performance, (3) Reasonable work assignments, including shift, post, and overtime assignments, (4) Individual differences in styles of personal expression, (5) Passionate, loud expression with no intent to harm others, (6) Differences of opinion on work-related concerns, and (7) The non-abusive exercise of managerial prerogative.

Reporting Procedures. If an employee believes someone has violated this policy, the employee should promptly bring the matter to the immediate attention of Human Resources. Every supervisor who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy, must immediately report the issues raised or conduct to Human Resources

Investigation Procedures. Upon receiving a complaint, the Company will promptly conduct an investigation into the facts and circumstances of any claim of a violation of this policy. Employees who file complaints will not suffer negative consequences for reporting others for inappropriate behavior. To the extent possible, the Company will endeavor to keep each party involved in the investigation confidential. However, complete confidentiality may not be possible in all circumstances. Employees are required to cooperate in all investigations conducted pursuant to this policy. The

Company will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination.

Retaliation. The Company will not tolerate retaliation, including any act of reprisal, interference, restraint, penalty, discrimination, intimidation, or harassment against an individual or individuals exercising their rights under this policy.

Reviewed 1.1.24

UTAH SUPPLEMENT

About This Utah Supplement

Creative Circle (the "Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Utah employees will receive the Company's national handbook ("Handbook") and the Utah Supplement to the Handbook ("Utah Supplement") (together, the "Employee Handbook").

The Utah Supplement applies only to Utah employees. It is intended as a resource containing specific provisions derived under Utah law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Utah Supplement are different from, or more generous than those in the Handbook, the policies in the Utah Supplement will apply.

The Utah Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Reasonable Accommodations Relating to Pregnancy, Childbirth, Breastfeeding, or Related Conditions

The Company will endeavor to provide reasonable accommodations to employees working in Utah affected by pregnancy, childbirth, or related medical conditions as required by law, unless such accommodations would result in an undue hardship on the operations of the Company. The Company will not require an employee to terminate employment if another reasonable accommodation can be provided for the employee's pregnancy, childbirth, breastfeeding, or related conditions unless the accommodation would create an undue hardship on the operations of the Company or deny employment opportunities to an employee if the denial is based on the need of the Company to make reasonable accommodations related to the pregnancy, childbirth, breastfeeding, or related conditions of an employee unless the accommodation would create an undue hardship on the operations of the Company.

The Company may require an employee to provide a certification from the employee's health care provider concerning the medical advisability of a reasonable accommodation including the following information:

- the date the reasonable accommodation becomes medically advisable;

- the probable duration of the reasonable accommodation; and
- an explanatory statement as to the medical advisability of the reasonable accommodation.

A certification from the employee's health care provider is not required if the reasonable accommodation requested is either more frequent restroom, food, or water breaks. The Company is not required to permit an employee to bring the employee's child to the workplace for purposes of accommodating pregnancy, childbirth, breastfeeding, or related conditions.

If employees have questions regarding this policy or would like to request a reasonable accommodation pursuant to this policy, they can contact Human Resources.

Reviewed 1.1.24

VERMONT SUPPLEMENT

About This Vermont Supplement

Creative Circle (the "Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Vermont employees will receive the Company's national handbook ("Handbook") and the Vermont Supplement to the Handbook ("Vermont Supplement") (together, the "Employee Handbook").

The Vermont Supplement applies only to Vermont employees. It is intended as a resource containing specific provisions derived under Vermont law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Vermont Supplement are different from, or more generous than those in the Handbook, the policies in the Vermont Supplement will apply.

The Vermont Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Sexual Harassment (Addendum to Discrimination, Harassment, & Retaliation Prevention Policy)

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below. Using the Company's complaint process does not prohibit an employee from filing a complaint with these agencies:

Vermont Attorney General's Office
Civil Rights Unit, 109 State Street
Montpelier, VT 05609
(802) 828-3657 (voice/TDD)

(Federal) Equal Employment Opportunity Commission (EEOC)
JFK Federal Building
15 New Sudbury Street, Room 475
Boston, MA 02203
(617) 565-3200 (voice)

Employees may file a complaint with the agencies noted above within 300 days of the date of alleged sexual harassment.

Vermont Earned Sick Time

Eligibility. The Company provides earned sick time to eligible employees who work for an average of at least 18 hours per week during a year. For employees who work in Vermont who are eligible for sick time under the general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any other applicable sick time/leave law or ordinance.

Accrual. Employees begin accruing earned sick time at the start of employment. Eligible employees will accrue one (1) hour of earned sick time for every fifty-two (52) hours worked, up to a maximum accrual of forty (40) hours each year. Exempt employees will be presumed to work forty (40) hours in each workweek for accrual purposes unless their normal workweek is less than forty (40) hours, in which case accrual will be based on that normal workweek. For purposes of this policy, the year is the consecutive 12-month period beginning January 1st and ending on December 31st.

Usage. Employees may begin using accrued earned sick time after completion of one (1) year of employment. Earned sick time may be used in a minimum increment of a quarter hour. An employee may not use more than forty (40) hours of accrued earned sick time in a year.

An employee may use accrued earned sick time for the following reasons:

1) Illness, injury, or to obtain professional diagnostic, preventive, routine, or therapeutic health care;
2) to care for a sick or injured parent, grandparent, spouse, child, brother, sister, parent-in-law, grandchild, or foster child, including helping that individual obtain diagnostic, preventive, routine, or therapeutic health treatment, or accompanying the employee's parent, grandparent, spouse, or parent-in-law to an appointment related to their long-term care;
3) To arrange for social or legal services or obtain medical care or counseling for the employee or for the employee's parent, grandparent, spouse, child, brother, sister, parent-in-law, grandchild, or foster child, who is a victim of domestic violence, sexual assault, or stalking or who is relocating as the result of domestic violence, sexual assault, or stalking;
4) To care for a parent, grandparent, spouse, child, brother, sister, parent-in-law, grandchild, or foster child, because the school or business where that individual is normally located during the employee's workday is closed for public health or safety reasons.

Employees who are absent for a covered reason(s) are required to use available earned sick time during the absence.

Notice and Documentation. Employees must notify their supervisor or manager as soon as practicable of the intent to take earned sick time as well as the expected duration of the absence. Employees must make reasonable efforts to avoid scheduling routine or preventive health care during regular work hours. The Company may require an employee to provide reasonable proof that the employee's use of earned sick time is for one of the reasons covered under this policy.

Payment. Earned sick time will be paid at the employee's normal hourly wage rate or the state minimum wage rate, whichever is greater, unless otherwise required by applicable law. Use of earned sick time is not considered hours worked for purposes of calculating overtime.

Carryover & Payout. An employee may carry over accrued, unused earned sick time under this policy to the following year. Accrued but unused earned sick time under this policy will not be paid at separation.

Vermont Parental & Family Leave (Addendum to FMLA Policy)

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

Eligibility. VPFLA leave is available to "VPFLA eligible employees." To be VPFLA eligible employee, an employee must:

1) Have worked for the Company for an average of at least thirty (30) hours a week for twelve (12) consecutive months; and
2) Be employed by an employer doing business in or operating within the state of Vermont, which:
   a) For parental leave purposes, employs ten (10) or more employees for an average of at least thirty (30) hours per week for twelve (12) consecutive months; and for
   b) For family leave purposes, employs fifteen (15) or more employees for an average of at least thirty (30) hours per week for twelve (12) consecutive months.

Basic Family and Medical Leave Entitlement. The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons. The VPFLA provides eligible employees:

1) Up to twelve (12) weeks of unpaid leave for pregnancy, birth, adoption of a child

16 or under, or serious illness of themselves or close family members in any 12-month period (i.e., Parental/Family Leave); and

2) Up to four (4) hours of unpaid leave in any 30-day period and not to exceed twenty-four (24) hours in any 12-month period for participation in school activities or conferences, accompany immediate family member to medical or professional services appointments to include routine or care and well-being, or to respond to medical emergency involving family member (i.e., Short Term Family Leave).

For purposes of VPFLA leave, family member includes an employee's child, stepchild, or ward who lives with the employee, foster child, parent, spouse, or parent of spouse. Spouse includes the employee's civil union partner.

For purposes of VPFLA leave, "serious illness" is defined as an accident, disease, or physical or mental condition that poses imminent threat of death; requires inpatient care in a hospital; or requires continuing in-home care under direction of a physician.

For adoption, leave may be taken any time within one (1) year of the initial placement of the child with the employee.

Short Term Family Leave must be taken in a minimum of 2-hour increments.

An employee's use of Short Term Family Leave is counted separately from the employee's use of parental or family leave.

Notice Requirements. Generally, employees must give reasonable written notice of their intent to take VPFLA leave, including the date leave is expected to commence and the estimated duration. In the case of serious illness of the employee or a member of the employee's family, the Company may require certification from a physician to verify the condition and the amount and necessity for the leave requested. With respect to Short Term Family Leave, employees must notify the Company as early as possible, but in no event later than seven (7) days before leave is expected to be taken except in cases of emergency. Employees must also provide reasonable notice of any intent to extend leave.

Spouses Employed by the Same Company. Unlike the FMLA, which provides that spouses employed by the same Company are limited to a combined total of twelve (12) workweeks in a 12-month period, if the leave is taken for the birth and care of a newborn child, placement of a child for adoption or foster care, or care of a parent with a serious health condition, no such limitation applies to VPFLA.

Restoration of Employment and Benefits. As with FMLA leave, at the end of VPFLA leave, subject to some exceptions, employees generally have the right to return to the same or equivalent position with equivalent pay, benefits and other terms. There is no key employee exception under the VPFLA

VIRGINIA SUPPLEMENT

About This Virginia Supplement

Creative Circle ("Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Virginia employees will receive the Company's national handbook ("Handbook") and the Virginia Supplement to the Handbook ("Virginia Supplement") (together, the "Employee Handbook").

The Virginia Supplement, however, applies only to Virginia employees. It is intended as a resource containing specific provisions derived under Virginia law that apply to the employee's employment. It should be read together with the Handbook and, to the extent that the policies in the Virginia Supplement are different from or more generous than those in the l Handbook, the policies in the Virginia Supplement will apply.

The Virginia Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative.

Virginia Pregnant Workers Fairness Act

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

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

accommodation can be provided to the known limitations related to the pregnancy, childbirth, or related medical conditions of such employee.

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

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

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

Reasonable Accommodation for Persons with Disabilities

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

Under the Act, the Company may not:

- Refuse to make reasonable accommodation to the known physical and mental impairments of an otherwise qualified person with a disability, if necessary to assist such person in performing a particular job, unless the employer can demonstrate that the accommodation would impose an undue hardship on the Company.
- Take adverse action against an employee who requests or uses a reasonable accommodation pursuant to this section.
- Deny employment or promotion opportunities to an otherwise qualified applicant or employee because such employer will be required to make reasonable accommodation for a person with a disability.
- Require an employee to take leave if another reasonable accommodation can be provided to the known limitations related to the disability.
- Fail to engage in a timely, good faith interactive process with an employee who has requested an accommodation pursuant to this section to determine if the requested accommodation is reasonable and, if such accommodation is determined not to be reasonable, discuss alternative accommodations that may be provided.

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

- Hardship on the conduct of the Company's business, considering the nature of the Company's operation, including composition and structure of the Company's workforce;

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

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

Reviewed 1.1.24

WASHINGTON SUPPLEMENT

About This Washington Supplement

Creative Circle ("Company") is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Washington employees will receive the Company's national handbook ("Handbook") and the Washington Supplement to the Handbook ("Washington Supplement") (together, the "Employee Handbook").

The Washington Supplement applies only to Washington employees. It is intended as a resource containing specific provisions derived under Washington law that apply to Washington employees' employment. It should be read together with the Handbook and, to the extent that the policies in the Washington Supplement are different from or more generous than those in the Handbook, the policies in the Washington Supplement will apply.

The Washington Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the CEO or the Board of Directors of the Company has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company.**

Please click on your state at this link to review the other labor law postings that may be applicable to you: State and Federal Labor Law Postings and Notices.

If employees have any questions about these policies, they should contact their Human Resources representative

Breaks & Meal Periods (For Non-Exempt Employees)

Rest Breaks. Non-exempt employees who work at least four (4) hours per workday are allowed to take one (1) 10-minute rest break for every four hours worked in one work period. For example, if an employee works four (4) or more hours, but not more than eight (8) hours in a workday, the employee is required to take one (1) 10-minute rest break during the first four hours of the shift. If an employee works eight (8) hours or more, but no more than twelve (12) hours in a day, the employee is required to take two (2) 10-minute rest breaks, and so on.

Rest breaks should be taken as close to the middle of each work period of four hours as is practical but in no event shall employees work more than three (3) consecutive hours without a rest break. Employees must take their rest breaks; and are prohibited from working during their rest breaks. Employees are paid for all rest break periods and do not need to clock out when taking a rest break.

Rest breaks may not be combined with each other or with the meal period. In addition, rest breaks may not be taken at the beginning or end of the workday to arrive late or leave

early. Unless otherwise instructed, rest breaks are self-directed and unscheduled, and may be taken as time allows on either a continuous or intermittent basis (e.g., two to three ""mini" breaks totaling ten (10) minutes). Examples of "mini" rest breaks are personal phone calls, eating a snack, having a cup of coffee, personal conversations, smoke breaks, and whenever an employee has the opportunity to take a break for a few minutes or more during a shift. It is a mandatory job duty for employees to advise Human Resources if they feel they do not have adequate opportunity for rest breaks, if they miss a rest break, or if they feel pressured to skip their rest breaks, so they can be properly compensated.

Meal Periods. Non-exempt employees who work more than five (5) consecutive hours in a workday are provided an unpaid, off-duty and uninterrupted meal period of at least thirty (30) minutes which must be taken between the second and fifth hour of the work period. Thereafter, a meal period of at least thirty (30) minutes is required for each five consecutive hours worked during the workday.

Employees working three (3) or more hours longer than their normal workday will be allowed one thirty (30) minute meal period prior to or during the overtime. For purposes of this requirement, a normal workday is the shift an employee is regularly scheduled to work.

Employees are responsible for scheduling their own meal periods, but should discuss strategies and plans for ensuring their meal periods with their supervisor(s) as needed. When scheduling meal periods, employees should try to anticipate their workflow and deadlines, but must take their meal periods no later than at the end of each five (5) hour period worked. During a meal period, employees are relieved of all duties and should not work during this time. When taking a meal period, employees should completely stop working for at least thirty (30) minutes. Employees are prohibited from working "off the clock" during their meal period.

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

If any employee's meal period is interrupted due to the employee performing a task, upon completion of the task, the meal period will be continued until the employee has received thirty (30) minutes total of mealtime (with the entire meal period being paid and reported as hours worked, and the time spent performing the task not being considered part of the meal period).

Meal Period Waiver. Non-exempt employees are encouraged to take their meal periods. However, with the company's permission, employees may be allowed to voluntarily waive their meal periods, and if they wish to do so on a standing basis, should complete a form

documenting the same. Employees who execute a standing waiver can revoke this waiver at any time, either on a one-off or continuing basis. See Human Resources to obtain this waiver form.

No Working During Rest Breaks and Meal Periods. Non-exempt employees are completely relieved of all work duties and responsibilities during their rest breaks and meal periods. Where practicable, rest breaks and meal periods should be taken outside employees' work areas, such as in a break room. Employees may leave the premises during meal periods, but may not leave the premises during rest periods. Employees should not visit or socialize with employees who are working while taking their rest break or meal period. Employees are required to notify Human Resources immediately if they believe they are being pressured or coerced by any manager, supervisor, or other employee to forego any portion of a provided rest break or meal period.

Summary Chart. Below is a chart that generally summarizes the number of rest breaks and meal periods provided to employees (these figures may vary depending on the timing of an employee's breaks).

Hours of Work	Rest Breaks	Meal Breaks
Less than 4 hours	0	0
4 hours - 4 hours 59 min	1	0
5 hours – 7 hours 59 min	1	1
8 hours – 9 hours 59 min	2	1
10 hours – 11 hours 59 min	2	2
12 hours – 14 hours 59 min	3	2
15 hours – 15 hours 59 min	3	3
16 hours – 19 hours 59 min	4	3
20 hours – 23 hours 59 min	5	4

Washington Paid Sick Leave

The Company provides paid sick and safe leave to eligible employees in compliance with Washington State's paid sick and safe leave law (PSSLL). If a Washington employee works in Seattle or Tacoma, the Company will comply with all applicable requirements of the paid sick leave ordinances of those cities that are more favorable to employees. Washington employees who are eligible for sick time under the Company's general paid time off policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid time off policy and/or any applicable sick time/leave law or ordinance.

Eligibility

All employees (including full-time, part-time and temporary employees) who work in Washington are eligible to accrue paid sick and safe leave, except for employees who do not meet the definition of “employee” under the Washington Minimum Wage Act, such as employees employed in executive, administrative, professional and outside sales capacities.

Accrual and Use of Paid Sick and Safe Leave

Eligible employees begin accruing paid sick and save leave pursuant to this policy at the start of employment.

Paid sick and safe leave accrues at a rate of one hour for every 40 hours worked, including overtime hours.

Employees will not accrue paid sick and safe leave while using paid sick and safe leave or other paid time off. Employees also will not accrue paid sick and safe leave during an unpaid leave of absence.

Employees may begin to use their accrued paid sick and safe leave on the 90th calendar day after they begin working for the Company. Employees can use paid sick and safe leave for an absence on any day for which they were required to work.

Paid sick and safe leave may be used in increments of one quarter of an hour or greater to cover all or just part of a workday.

Employees are not required to find an employee to cover their work when they take paid sick and safe leave. Paid sick and safe leave taken in accordance with this policy will not be counted as an absence or occurrence that may result in discipline under any Company policy.

Reasons Sick and Safe Leave May be Used

Eligible employees may use paid sick and safe leave for the following reasons:

- Because of the employee’s or the employee’s family member’s mental or physical illness, injury or health condition;
- For the diagnosis, care or treatment of the employee’s or the employee's family member's mental or physical illness, injury or health condition;
- For preventive medical care for the employee or the employee’s family member;
- If either the employee's place of business or the employee's child's school or place of care is closed by order of a public official for a health-related reason (i.e., a serious public health concern that could result in bodily injury or exposure to an infectious agent, biological toxin or hazardous material; a closure for inclement weather is not a health-related reason);
- Absences that qualify for leave under the state’s domestic violence leave law due to in incident of domestic violence, sexual assault or stalking of the employee or the employee’s family member to:

- Seek legal or law enforcement assistance or remedies to ensure the health and safety of the employee or the employee's family members;
- Seek treatment by a health care provider for physical or mental injuries caused by domestic violence, sexual assault or stalking;
- Attend to health care treatment for a victim who is the employee's family member;
- Obtain, or assist a family member in obtaining, services from a domestic violence shelter, rape crisis center or other social services program for relief from domestic violence, sexual assault or stalking;
- Obtain, or assist a family member in obtaining, mental health counseling related to an incident of domestic violence, sexual assault or stalking in which the employee or the employee's family member was a victim of domestic violence, sexual assault or stalking; or
- Participate in safety planning, temporarily or permanently relocate or take other actions to increase the employee's safety or the safety of the employee's family members from future domestic violence, sexual assault or stalking.

Eligible family members include:

- A spouse or registered domestic partner;
- A biological, adopted or foster child; stepchild; legal ward; or child to whom the employee stands in *loco parentis,* is a legal guardian, or is a de facto parent, regardless of age or dependency status;
- A biological, adoptive, de facto or foster parent, stepparent or legal guardian of the employee or employee's spouse or registered domestic partner; or a person who stood in *loco parentis* when the employee was a minor child;
- A sibling;
- A grandparent; or
- A grandchild.

For absences related to the employee's or family member's status as a victim of domestic violence, sexual assault or stalking, "family member" also includes an individual with whom the employee has a dating relationship.

Requesting Paid Sick and Safe Leave/Documentation

When the need for paid sick and safe leave is foreseeable, employees must provide reasonable advance notice to their supervisor. The employee should provide notice as soon as practicable and must provide notice at least 10 calendar days before the date sick or safe leave will begin. If the need for paid sick and safe leave is unforeseeable, employees must provide notice to their supervisor of the need to use the time as soon as practicable. In all circumstances, employees should specify that the requested time off is for sick or safe leave reasons (as opposed to, for example, vacation time), so that the absence may be designated accordingly.

If it is impracticable for an employee to provide notice of the need for sick and safe leave, another person can provide notice on the employee's behalf.

For absences exceeding three consecutive days (for all or a portion of the time that an employee is required to work), the Company may require employees to provide verification that their use of paid sick and safe leave is for an authorized purpose. Employees must submit any required documentation within ten calendar days following the first day of paid sick and safe leave. For employees using paid sick and safe leave related to the employee's or family member's status as a victim of domestic violence, sexual assault or stalking, employees must provide the requested verification in a timely manner after the Company requests it. If an employee anticipates that providing required documentation will create an unreasonable burden, the employee can provide an oral or written explanation to the Company, which asserts that the use of paid sick and safe leave was for an authorized purpose and explains why the requested verification creates an unreasonable burden or expense for the employee. Within ten calendar days of the employee providing an explanation to the Company, the Company will make a reasonable effort to identify and provide alternatives for the employee to meet the verification requirement in a manner that does not result in unreasonable burden or expense on the employee.

The Company may request documentation related to the absence for other reasons as required or permitted under federal, state or other local law including but not limited to for family medical leave or related to a reasonable accommodation.

Rate of Pay for Sick and Safe Leave/Overtime

Sick and safe leave will be paid at the employee's regular and normal rate of pay at the time the employee uses the leave, or at minimum wage, whichever is greater. Employees will not receive overtime pay for sick and safe leave.

Carryover

Accrued but unused paid sick and safe leave may be carried from year to year, up to a maximum of 40 hours. If, at the end of the benefit year, an employee has accrued more than 40 hours of paid leave the employee may carry over only 40 hours to the next benefit year, and the remaining accrued leave will be forfeited.

Separation From Employment

Compensation for accrued and unused sick and safe leave is not provided upon separation from employment for any reason. If an employee is rehired by the Company within 12 months of separation from employment, previously accrued but unused sick and safe leave will immediately be reinstated and the previous period of employment will be counted for purposes of determining the employee's eligibility to use paid sick and safe leave. If the employee is being rehired during the benefit year following the year in which their employment ended, the amount of reinstated paid sick and safe leave will be capped at a maximum of 40 hours. Upon rehire, the Company will provide notification to the employee of the amount of accrued, unused paid sick and safe leave available for use by the employee.

Confidentiality

The Company will keep confidential the medical or other personal information about an employee or employee's covered family member and treat such information in accordance with applicable privacy laws.

Effect on Other Rights and Policies

The Company may provide other forms of leave for employees to care for medical conditions or for issues related to domestic violence under certain federal, state and municipal laws. In certain situations, leave under this policy may run at the same time as leave available under another federal, state or municipal law, provided eligibility requirements for that law are met. The Company is committed to complying with all applicable laws. Employees should contact their Human Resources for information about other federal, state and municipal domestic violence, medical or family leave rights.

No Discrimination or Retaliation

The Company will not interfere with, restrain or deny an employee's rights under the PSSLL and will not discriminate or retaliate against an employee because they exercise those rights. The Company also will not discriminate or retaliate against an employee who files an action or otherwise institutes a proceeding under or related to the PSSLL or who testifies or intends to testify in any such proceeding related to any protected rights under the PSSLL.

Seattle Paid Sick and Safe Leave (Seattle)

The Company provides eligible employees who perform work in Seattle with paid sick and safe time ("Sick Time" and "Safe Time," collectively "Sick and Safe Time") in accordance with the requirements of Seattle's Paid Sick and Safe Time Ordinance ("SPSSTO"). The Company also complies with Washington's Paid Sick and Safe Leave Law (PSSLL) and will comply with all applicable requirements of the PSSLL that are more favorable to employees. For employees who work in Seattle who are eligible for sick time under the Company's general sick time or leave policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid sick time or leave policy and/or any applicable sick time/leave law or ordinance.

The guidelines set forth in this policy do not supersede applicable federal law regarding leaves of absence, including leave taken under the Family and Medical Leave Act (FMLA) and/or as a reasonable accommodation under the Americans with Disabilities Act (ADA) the Americans with Disabilities Act Amendments Act of 2008 (ADAAA) or any other applicable federal, state or local law, including those prohibiting discrimination and harassment.

Eligibility

All exempt, nonexempt, full-time and part-time employees who perform work within Seattle city limits (Seattle) are eligible for leave under this policy. Paid interns (other than work study participants) who work in Seattle are also eligible, as are temporary employees other than those supplied to the Company by a staffing agency or similar entity. Employees who are based outside of Seattle but who work in Seattle on an occasional, irregular basis inside Seattle ("Occasional Employees") are eligible for Sick and Safe Time once they have worked more than 240 hours in Seattle within an anniversary year. If an Occasional Employee works more than 240 hours in an anniversary year, they will remain eligible to accrue Sick and Safe Time for the duration of their employment with the Company. In addition, all previous hours worked in Seattle during the anniversary year will count toward the accrual of paid sick and safe time. For purposes of this policy, the anniversary year is the consecutive 12-month period beginning on the employee's date of hire.

Reasons Sick and Safe Time May Be Used

Employees may use accrued Sick Time for any of the following reasons:

- The employee's mental or physical illness, injury or health condition; to allow an employee to obtain a medical diagnosis, care or treatment for the same; or for an employee's need for preventive medical care; or
- To allow an employee to care for a family member with a mental or physical illness, injury or health condition; who needs to obtain a medical diagnosis, care or treatment for the same; or who needs preventive medical care.

For use of Sick Time, "family member" means a child, grandparent, parent or parent-in-law or spouse. A "child" includes a biological, adopted or foster child; a stepchild; a legal ward; or a child for whom the employee is standing in loco parentis who is under 18 years old or is over 18 but incapable of self-care because of a mental or physical disability. A "parent" includes a biological or adoptive parent, or an individual who stood in loco parentis to an employee when the employee was a child. A "spouse" includes a husband, wife, same-sex spouse or a domestic partner registered with a city or state.

Employees may use accrued Safe Time for any of the following reasons:

- The employee's place of business has been closed by order of a public official to limit exposure to an infectious agent, biological toxin or hazardous material, or the employee needs to care for a child whose school or place of care has been closed for any of those same reasons (weather-related business or school closures are not included); or
- The employee or the employee's family member is a victim of domestic violence, sexual assault or stalking and needs time off to:
    - Seek legal or law enforcement assistance,
    - Obtain treatment by a health care provider, social services or mental health counseling;
    - Participate in safety planning;
    - Relocate; or

- Take other actions to increase the safety of the employee or the employee's family member.

For use of Safe Time, "family member" means children; stepchildren; current or former spouses; domestic partners registered with a city or state; parents; parents-in-law; stepparents; grandparents; grandchildren; persons with whom the employee has a child in common; any person related to the employee by blood, marriage or domestic partnership; and any person with whom the employee has a current or former dating or cohabitation relationship.

Accrual of Sick and Safe Leave

Company is considered a Tier 3 employer for purposes of the SPSSTO. Accordingly, eligible employees accrue paid Sick and Safe Time at the rate of one hour per 30 hours worked. There is no cap on accrual of Sick and Safe Time under this policy.

Occasional Employees only accrue Sick and Safe Time under this policy for the hours that are worked in Seattle.

Nonexempt employees will accrue Sick and Safe Time on eligible hours worked, including overtime hours. Exempt employees' accrual of Sick and Safe Time will be based on a 40-hour workweek or each employee's normal workweek, whichever is less.

Eligible employees will begin accruing Sick and Safe Time upon the commencement of employment with the Company.

The Company will provide employees with a written statement of accrued Sick and Safe Time each time wages are paid.

Employees who leave the Company and are rehired within twelve months of separation will be eligible for reinstatement of previously accrued and unused Sick and Safe Time. Similarly, employees who stop working in Seattle but are later transferred back to working in Seattle will have their previously available accrued Sick and Safe Time reinstated.

Requesting and Using Sick and Safe Time

Employees may begin using accrued Sick and Safe Time on the 90th calendar day of their employment with the Company. Occasional Employees may only use paid Sick and Safe Time under this policy during times that they are scheduled to perform work in Seattle.

Employees must provide the Company with a written request for Sick and Safe Time at least 10 days in advance, unless the need for leave is unforeseeable. If the need for leave is foreseeable, employees must schedule the leave so as not to unduly disrupt the Company's operations. When possible, the request must include the anticipated start of the leave and the anticipated duration of the absence. If the need for leave is unforeseeable, employees must provide notice as soon as practicable. If the leave is needed for reasons related to domestic violence, sexual assault or stalking, an employee must provide notice by the end

of the first day of absence. When possible, the request must include the anticipated start of the leave and the anticipated duration of the absence.

The Company will not count employees' use of Sick and Safe Time as an absence when evaluating absenteeism. Therefore, any use of Sick and Safe Time will not count as an "occurrence" under any Company policy.

The Company will allow employees to use their Sick and Safe Time in increments of one quarter of an hour**.** Exempt employees who are absent for less than one hour will not be charged Sick and Safe Time.

Verification of Sick and Safe Time

When employees use four or more consecutive days of Sick Time, the Company may require a doctor's note or other verification of the need for the absence. When employees use four or more continuous days of Safe Time, the Company may require verification of the closure order or verification that the employee or the employee's family member is a victim of domestic violence, sexual assault or stalking and that the Safe Time is for one of the purposes covered by the law.

In the event of a clear instance or pattern of abuse, the Company may require documentation that an employee's use of Sick and Safe Time is consistent with permissible reasons, regardless of whether the employee has used the leave for four or more consecutive days.

Employees have the right to assert that the verification requirement results in an unreasonable burden or expenses on the employee. If an employee anticipates that the requirement will result in an unreasonable burden or expense, the employee may provide an oral or written explanation to Human Resources which asserts that the employee's use of Sick and Safe Time was for a covered purpose and how the verification requirement creates an unreasonable burden or expense on the employee

Compensation

Paid Sick and Safe Time will be calculated based on an employee's regular hourly rate at the time of their absence.

Accrued but unused Sick and Safe Time will not be paid out upon termination of employment.

Leave Carryover

Accrued Sick and Safe Time may be carried over from year to year, up to a maximum carry-over amount of 72 hours. If, at the end of the benefit year, an employee has accrued more than 72 hours of Sick and Safe Time, the employee may carry over only 72 hours to the next benefit year, and the remaining accrued Sick and Safe Time will be forfeited.

Effect on Other Rights and Policies

The Company may provide other forms of leave for employees to care for medical conditions or for leave related to domestic violence under certain federal, state and municipal laws. In certain situations, leave under this policy may run concurrently with leave available under another federal or state law, provided eligibility requirements for that law are met. The Company is committed to complying with all applicable laws. Employees should contact their Human Resources representative for information about other federal, state and municipal medical or family leave rights.

Confidentiality

The Company will keep confidential the fact that an employee's absence is for Sick and Safe Time and any information provided to the Company in support of a request for leave, including health information, except upon the employee's request or otherwise with the employee's consent.

Retaliation

The Company will not discriminate or retaliate against employees who request or take leave in accordance with this policy or inquire about their rights under the SPSSTO, inform others of rights under the SPSSTO, make a complaint in good faith, even if mistaken, about suspected violations of this policy or of the SPSSTO, testify in a proceeding under or related to the SPSSTO, refuse to participate in an activity that would result in a violation of city, state or federal law or otherwise engage in conduct protected under the SPSSTO.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Paid Leave Tacoma

The Company provides eligible Tacoma employees with paid leave in accordance with the requirements of the Tacoma Paid Leave Ordinance (TPLO). The company also complies with Washington's Paid Sick and Safe Leave Law (PSSLL) and will comply with all applicable requirements of the PSSLL that are more favorable to employees.

For employees who work in Tacoma who are eligible for sick time under the Company's general sick time or leave policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid sick time or leave policy and/or any applicable sick time/leave law or ordinance.

Eligibility

All employees (except for work study participants and temporary employees supplied to the Company by a staffing agency or similar entity) who work more than 80 hours per the 12-month period beginning on the date of hire in Tacoma are eligible for leave under this policy. Once employees meet the 80-hour per year threshold, they will remain eligible to accrue paid leave during that year and for one subsequent year.

Employees who are based outside of Tacoma but who work in Tacoma on an occasional, irregular basis ("Occasional Employees") are eligible for paid leave if they work more than 80 hours in Tacoma within the 12-month period beginning on the date of hire. When an Occasional Employee becomes eligible for paid leave, they will be provided with an amount of leave equal to what the employee would have accrued for hours worked to date during the current 12-month period beginning on the date of hire**.** Once an Occasional Employee meets the 80-hour threshold, they remain eligible to accrue paid leave during that year and for one subsequent year.

Reasons Paid Leave May Be Used

Eligible employees may use accrued paid leave for the following reasons:

- The employee's mental or physical illness, injury or health condition; to allow an employee to obtain a medical diagnosis, care or treatment for the same; or for an employee's need for preventive medical care; or
- To allow an employee to care for a family member with a mental or physical illness, injury or health condition; who needs to obtain a medical diagnosis, care or treatment for the same; or who needs preventive medical care.
- Bereavement for the death of a family member;
- The employee's workplace has been closed by order of a public official to limit exposure to an infectious agent, biological toxin or hazardous material;
- To care for a child whose school or place of care has been closed by order of a public official; or
- The employee or the employee's family member is a victim of domestic violence, sexual assault or stalking, and the employee needs time off to:
    - Seek legal or law enforcement assistance to ensure the employee's or family member's health and safety, including, but not limited to, preparing for or participating in any civil or criminal legal proceeding related to or derived from domestic violence, sexual assault or stalking;
    - Obtain, or assist a family member in obtaining, services from a domestic violence shelter, rape crisis center or other social services program for relief from domestic violence, sexual assault or stalking;
    - Participate in safety planning, temporarily or permanently relocate, or take other actions to increase the safety of the employee or family members from future domestic violence, sexual assault or stalking.

For purposes of this policy, "family member" means a child, grandparent, parent, spouse or domestic partner. A "child" includes a biological, adopted or foster child; a stepchild; a legal ward; or a child for whom the employee is standing in loco parentis who is under 18 years old or is over 18 but incapable of self-care because of a mental or physical disability.

A "parent" includes a biological or adoptive parent, or an individual who stood in loco parentis to an employee when the employee was a child. A "spouse" includes a husband, wife or domestic partner.

Annual Accrual of Paid Leave

Eligible employees begin to accrue paid leave on the first day of employment.

Eligible employees accrue paid leave at the rate of one hour per every 40 hours worked in Tacoma. For accrual purposes, salaried exempt employees will be assumed to work 40 hours in a week unless the employee's regular workweek is less than 40 hours, in which case paid leave accrues based upon that regular workweek.

Requesting and Using Leave

Employees may begin using accrued paid leave on the 90th calendar day of their employment with the Company.

Paid leave can be used in one quarter of an hour increments. Exempt employees who are absent for less than one hour will not be charged leave time.

The Company will not count employees' use of paid leave as an absence when evaluating absenteeism. Therefore, any use of paid leave will not count as an "occurrence" under any company policy.

If the need for leave is foreseeable, employees must provide the Company with a written request for paid leave at least 10 days in advance or, if 10 days' notice is not feasible, then as far in advance as possible. Employees must also make a reasonable effort to schedule the leave so as not to unduly disrupt the Company's operations. When possible, the request must include the anticipated start of the leave and the anticipated duration of the absence. If the need for leave is unforeseeable, employees must provide notice as soon as practicable and must generally comply with the Company's reasonable normal notice requirements or call-in procedures.

For absences exceeding four consecutive days, the Company may require employees to provide verification that their use of paid sick and safe leave is for an authorized purpose. Employees must submit any required verification within ten calendar days following the first day of paid sick and safe leave.

For Sick Time purposes, verification may include:

- A doctor's note or a signed statement by a health care provider indicating that the absence is for care of an employee or their family member (identifying the nature of the health condition is not required).

- Written notice of closure by order of a public official that the employee received regarding the employee's child's school or place of care.
- An obituary or a death certificate.

For Safe Time purposes, verification may include:

- A police report indicating that the employee or the employee's family member is a victim of domestic violence, sexual assault, or stalking,
- A court order of protection.
- Other evidence from the court or the prosecuting attorney showing that the employee or the employee's family member appeared, or is scheduled to appear, in court in connection with an incident of domestic violence, sexual or assault or stalking.
- Documentation from any of the following persons from whom an employee or their family member sought assistance in addressing domestic violence, sexual assault, or stalking indicating that the employee or the employee's family member is a victim:
    - An advocate for victims of domestic violence, sexual assault, or stalking,
    - An attorney,
    - A member of the clergy, or
    - A medical professional.
- An employee's written statement that the employee or their family member is a victim of domestic violence, sexual assault or stalking, and that PTO was used for one of the Safe Time uses covered by law.

If an employee fails to return requested verification within the timeline described in this paragraph, and does not assert (pursuant to the following paragraph) that obtaining the requested verification would result in an unreasonable burden or expense, PSSL may be denied or delayed.

If an employee anticipates that providing required verification will create an unreasonable burden or expense on the employee, the employee can provide an oral or written explanation that: (1) the employee's use of PSSL was for a permissible use of paid sick and safe leave; and (2) how the required verification creates an unreasonable burden or expense on the employee. Within ten calendar days of the employee providing an explanation to the Company, the Company will make a reasonable effort to identify and provide alternatives for the employee to meet the verification requirement in a manner that does not result in unreasonable burden or expense on the employee.

In the event of a clear instance or pattern of abuse, the Company may require documentation that an employee's use of Sick and Safe Time is consistent with permissible reasons, regardless of whether the employee has used the leave for four or more consecutive days.

Compensation

Compensation for paid leave is calculated based on the hourly rate an employee would have earned during the time leave was taken.

Leave Carryover

An employee may carry over up to forty (40) hours of accrued, unused paid leave under this policy from year to year. If, at the end of the benefit year, an employee has accrued more than 40 hours of paid leave the employee may carry over only 40 hours to the next benefit year, and the remaining accrued leave will be forfeited.

Effect on Other Rights and Policies

The Company may provide other forms of leave for employees to care for medical conditions or issues related to domestic violence under federal, state or municipal laws. In certain situations, leave under this policy may run at the same time as leave available under another federal, state or municipal law, provided eligibility requirements for the other law are met. The Company is committed to complying with all applicable laws. Employees should contact their Human Resources representative for information about other federal, state and municipal medical, family or domestic violence leave rights.

Confidentiality

The Company will treat as confidential records and documents relating to medical certifications or histories of covered employees and their family members and will maintain them in accordance with federal, state and local medical privacy laws. The Company will also treat records and information about an employee or an employee's family member related to domestic violence, harassment, sexual assault, stalking or other safety-related issues as confidential and will not release such records without express written permission from the employee, unless otherwise required by law.

Separation from Employment

Compensation for accrued and unused paid leave is not provided upon separation from employment for any reason.

Former employees who are rehired within twelve (12) months of their separation employment will have previously unused paid sick and safe leave reinstated, and the hours they worked during the previous period of employment will be counted for purposes of determining eligibility to use sick and safe leave. If the period of time an employee is separated from employment extends into a subsequent benefit year, the amount of accrued but unused paid sick and safe leave reinstated will be capped at 40 hours.

Retaliation Prohibited

The Company will not retaliate or tolerate retaliation against any employee who seeks or obtains leave under this policy, makes a complaint in good faith, even if mistaken, about suspected violations of this policy or of the TPLO or otherwise exercises their rights under the TPLO in good faith.

Questions regarding this policy may be directed to Human Resources – Benefits Team.

Washington Paid Family and Medical Leave ("PFML")

Eligibility

Employees who have worked 820 hours in the qualifying period (equal to 16 hours a week for a year) are eligible to apply for paid medical leave or paid family leave (collectively "PFML"). "Qualifying period" means the first four of the last five completed calendar quarters or, if eligibility is not established, the last four completed calendar quarters immediately preceding the application for PFML. The 820 hours are cumulative, regardless of the number of employers or jobs someone has during a year. All paid work over the course of the year counts toward the 820 hours, including part-time, seasonal, and temporary work.

Entitlement

Beginning January 1, 2020, PFML is available to eligible employees for up to twelve (12) weeks within any 52 consecutive week period:

(a) To participate in providing care, including physical or psychological care, for the employee's family member (child, grandchild, grandparent, parent, sibling, or spouse or state registered domestic partner of an employee) with a serious health condition;
(b) To bond with the employee's child after the child's birth or after the placement of a child under the age of eighteen (18) with the employee;
(c) Because of any qualifying exigency as permitted under the federal Family and Medical Leave Act ("FMLA") for the employee's family member (child, grandchild, grandparent, parent, sibling, or spouse or state registered domestic partner of an employee); or
(d) Because of an employee's own serious health condition.

For purposes of the above, unless the context clearly requires otherwise: (i) the term "child" includes biological, adopted, or foster child, a stepchild, or a child to whom the employee stands in loco parentis, is a legal guardian, or is a de factor parent, regardless of age or dependency status; and the term "parent" includes biological, adoptive, de facto, or foster parent, stepparent, or legal guardian of an employee or the employee's spouse

or state registered domestic partner, or an individual who stood in loco parentis to an employee when the employee was a child.

Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, caring for the parents of the military member on covered active duty, and attending post-deployment reintegration briefings.

If an employee faces multiple events in a year, the employee may be eligible to receive up to sixteen (16) weeks, and up to eighteen (18) weeks if the employee experiences a serious health condition during pregnancy that results in incapacity.

Leave to care for the employee's child after birth, or placement for adoption or foster care must be taken within one (1) year of the child's birth or placement. Leave for any other reason must be taken within one (1) year of the date of which the employee filed an application for the benefits.

These benefits are financed through both employee and employer contributions to the PFML program. It will be administered by the Washington Employment Security Department (ESD). Premium collection was permitted beginning January 1, 2019. In 2019 and 2020, the total premium is 0.4 percent of wages. Employers can either pay the full premium or withhold a portion of the premium from their employees. Employers who choose to withhold premiums from their employees may withhold up to about 63 percent of the total premium, or $2.44 per week for an employee making $50,000 annually. The employer is responsible for paying the other 37 percent. Businesses with fewer than 50 Washington employees are exempt from the employer portion of the premium but must still collect or opt to pay the employee portion of the premium. The Company will calculate and withhold premiums from employees' paychecks and send both employees' shares and the Company's share, if applicable, to ESD on a quarterly basis.

While on PFML, employees are entitled to partial wage replacement at a portion of their average weekly pay. There is a waiting period equal to the first seven consecutive calendar days of leave, except no waiting period is required where leave is for the birth or placement of a child. If an employee's average weekly wage is: 50% or less of the state average weekly wage, the employee's weekly benefit is 90% of the employee's average weekly wage; greater than 50% of the of the state average weekly wage, the employee's weekly benefit is the sum of: (i) 90% of 50% of the state average weekly wage; and (ii) 50% of the employee's average weekly wage that is greater than 50% of the state average weekly wage. The maximum weekly benefit for PFML that occurs on or after January 1, 2020 will be $1,000 per week. This weekly maximum will be adjusted effective January 1st of each subsequent year as determined by the state based on 90% of the state's average weekly wage. The minimum weekly benefit will be $100 per week, except that if the employees' average weekly wage at the time of PFML is less than $100 per week, the weekly benefit will be the employee's full wage. Employees will be paid benefits directly by ESD rather than the Company.

In any week in which an employee is eligible to receive benefits under Title 50 (unemployment compensation) or Title 51 (industrial insurance) of the Revised Code of Washington, or other applicable federal or state unemployment compensation, industrial insurance, or disability insurance laws, the employee is disqualified from receiving PFML.

Definition of a Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves: (i) inpatient care in a hospital, hospice, or residential medical care facility; or (ii) continuing treatment by a health care provider. Subject to certain conditions, the continuing treatment requirement may include, but is not limited to: (A) a period of incapacity of more than three consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition; (B) any period of incapacity due to pregnancy, or for prenatal care; (C) any period of incapacity or treatment for such incapacity due to a chronic serious health condition; (D) a period of incapacity which is permanent or long term due to a condition for which treatment may not be effective; or (E) any period of absence to receive multiple treatments, including any period of recovery from the treatments, by a healthcare provider or by a provider of health care services under orders of, or on referral by, a health care provider, either for: (I) restorative surgery after an accident or other injury; or (II) a condition that would likely result in a period of incapacity of more than three consecutive, full calendar days in the absence of medical intervention or treatment, such as cancer, severe arthritis, or kidney disease.

Use of PFML

An employee does not need to use this PFML entitlement in one block. PFML can be taken intermittently in minimum increments of eight (8) consecutive hours. PFML taken on an intermittent basis will not result in a reduction of the total amount of PFML to which an employee is entitled beyond the amount of PFML actually taken. Successive periods of PFML caused by the same or related injury or sickness are deemed a single period of family and medical PFML only if separated by less than four months.

Employee Notice to the Company

An employee must provide the Company at least thirty (30) days' written notice before PFML is to begin if the need for PFML is foreseeable based on an expected birth, placement of a child, or planned medical treatment for a serious health condition. An employee must provide the Company written notice as soon as is practicable when thirty (30) days' notice is not possible, such as because of a lack of knowledge of approximately when PFML will be required to begin, a change in circumstances, or a medical emergency. An employee must provide the Company written notice as soon as is practicable for foreseeable PFML due to a qualifying exigency, regardless of how far in advance such PFML is foreseeable. When the need for PFML is not foreseeable, an employee must provide written notice to the Company as soon as is practicable under the facts and circumstances of the particular situation. If the employee is unable to provide

notice personally, written notice may be given by another responsible party, such as the employee's spouse, neighbor, or coworker.

An employee must provide written notice to make the Company aware that the employee may need PFML. The notice must contain at least the anticipated timing and duration of the PFML. Written notice includes, but is not limited to, handwritten or typed notices, and all forms of written electronic communications such as text messages and email.

Whether PFML is to be continuous or is to be taken intermittently or on a reduced schedule basis, written notice need only be given one time, but the employee must inform the Company as soon as is practicable if dates of the scheduled PFML change, are extended, or were initially unknown.

Filing Claims with the ESD

An employee may apply for PFML benefits by: (a) using the ESD online services; (b) contacting the paid family and medical leave customer care center by telephone; or (c) alternate methods authorized by ESD.

When an employee submits an application for PFML benefits, the employee must provide information sufficient for ESD to determine eligibility for benefits. This information includes, but is not limited to, information identifying the employee, the type and anticipated duration of PFML, as well as certification or documentation to validate the qualifying event. If an employee is in a claim year and has need for successive periods of benefits for the same qualifying event beyond what was originally approved, the employee must update the application. If an employee experiences a new qualifying event during a claim year, the employee must reopen the claim and provide additional information required by the department before benefits can be paid. Any time an employee applies for PFML benefits, the application must be supported by documentation or certification as required by applicable law. For example, when PFML is taken because of an employee's own serious health condition or the serious health condition of a family member, certification from a health care provider will be required.

The ESD is solely responsible for determining if an employee is eligible for benefits.

Supplemental Benefits During PFML

Company does not offer supplemental benefits to employees who are receiving PFML.

Job Benefits and Protection

Employees may keep their health insurance while on PFML. Employees who contribute to the cost of their health insurance, must continue to pay their portion of the premium cost while on PFML.

Employees who return from PFML generally will be restored to a same or equivalent job if they work for an employer with 50 or more employees, have worked for this employer

for at least 12 months, and have worked 1,250 hours in the 12 months before taking PFML (about 24 hours per week, on average). Otherwise, employees taking PFML are not guaranteed job reinstatement unless they qualify for such reinstatement under federal and/or state leave laws or other applicable laws.

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

PFML Concurrent with FMLA

Any time off for PFML purposes will run concurrently with Family and Medical Leave Act (FMLA), if applicable, with the exception of any leave for sickness or temporary disability because of pregnancy or childbirth, which is in addition to leave under PFML. Please see the "Family and Medical Leave" policy for eligibility requirements.

Retaliation Prohibited

The Company will not retaliate or tolerate retaliation against any employee who seeks or obtains leave under this policy, makes a complaint in good faith, even if mistaken, about suspected violations of this policy or of the PFML or otherwise exercises their rights under the PFML in good faith.

Questions about PFML

For more information on PFML, employees may go to paidleave.wa.gov or speak with their Human Resources representative.

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