

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		1 OF 49	10-12-2018

US EMPLOYMENT MANUAL

Approved by: Paula Breeze 10-12-2018

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		2 OF 49	10-12-2018

TABLE OF CONTENTS

1.	Purpose	7
1.1	Document Purpose.....	7
1.2	“At Will” Employment.....	7
2.	Employment.....	8
2.1.1	Regular Full-Time Employees.....	8
2.1.2	Regular Part-Time Employees.....	8
2.1.3	Temporary Employees	8
2.1.4	Contract Workers	8
2.2	Fair Labor Standards Act (“FLSA”) Classifications	8
2.2.1	Non-Exempt Employee	9
2.2.2	Exempt Employee.....	9
2.3	Employment Offers	9
2.4	Internal Transfers/Promotions	10
2.5	Employment References	10
2.6	Employment Records	10
2.7	Nepotism, Employment and Personal Relationships.....	10
2.8	Orientation and Training.....	10
2.9	Termination of Employment.....	10
2.9.1	Voluntary Resignations	10
2.9.2	Involuntary Resignations	11
2.9.3	Termination Process.....	11
3.	Diversity and Anti-Discrimination, Anti-Harassment and Retaliation Policy.....	12
3.1	Equal Employment Opportunity Policy	12
3.2	Scope	12
3.3	Discrimination	12
3.4	Harassment	12
3.4.1	Sexual Harassment	13

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA’S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		3 OF 49	10-12-2018

3.5	Investigations	14
3.6	Determinations	14
3.7	False Claims	14
3.8	Discipline	14
4.	Workplace Safety	14
4.1.1	Purpose	14
4.1.2	Scope	15
4.1.3	Organization Units Affected	15
4.1.4	Definitions	15
4.1.5	Policy Objectives	17
4.1.6	Policy	17
4.1.7	Searches and Inspections	17
4.1.8	Authorized Use of Prescribed or Over-the-Counter (“OTC”) Drugs	18
4.1.9	Prohibitions	18
4.1.10	Testing	19
4.1.11	Testing Required	19
4.1.12	Medical Review Officer (MRO) – third party	22
4.1.13	Re-Test/Appeals Procedures	22
4.1.14	Consequences for Violations of the Drug and Alcohol Policy	23
4.2	Drug and Alcohol Policy, Appendix A DOT	23
4.2.1	Purpose	23
4.2.2	Scope	24
4.2.3	Definitions	24
4.2.4	Prohibitions	25
4.2.5	Testing	27
4.2.6	Testing Required	27
4.2.7	Result of Positive Test/Refusal to Test	29
4.2.8	Records	29
4.3	Health, Safety, and Environmental Policy	29

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA’S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		4 OF 49	10-12-2018

4.4	Weapons Policy	30
4.5	Security/Visitors	30
4.6	Smoke Free Workplace	30
5.	Workplace Expectations	30
5.1	Outside Employment	30
5.2	Business Hours	30
5.3	Attendance	30
5.4	Dress Code and Personal Appearance	31
5.5	Social Media Policy	31
5.5.1	Using Social Media at Work	32
5.5.2	Confidential Information	32
5.5.3	Be Honest and Accurate	32
5.5.4	Be Respectful	32
6.	Information Technology-Acceptable Use Policy	33
6.1	Purpose	33
6.2	Scope	33
6.3	Usage	33
6.4	Unacceptable Usage	33
6.4.1	Network Activities	33
6.4.2	Local Computer Activities	34
6.5	E-Mail Usage	34
6.6	Mobile Phones and Other Personal Devices	35
6.7	Security	35
6.8	Passwords	36
6.9	Privacy	36
6.10	Enforcement	36
7.	Compensation	36
7.1	Paydays and Manner of Payment	36
7.2	Payroll Timekeeping	37

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		5 OF 49	10-12-2018

7.3	Overtime Pay	37
7.4	Garnishments and Other Deductions	37
7.4.1	Deductions For Exempt Employees Pay	38
7.4.2	Company Policy Regarding Improper Deductions	38
7.4.3	What To Do If An Improper Deduction Occurs	38
7.5	Expense Reimbursement Policy.....	39
7.5.1	Purpose.....	39
7.5.2	Scope.....	39
7.5.3	Definitions	39
7.5.4	Policy.....	40
7.5.5	Responsibility	40
7.5.6	Enforcement	40
7.5.7	General Guidelines	40
7.5.8	Meals – Employee Only.....	41
7.5.9	Meals or Entertainment – Group.....	41
7.5.10	Dues, Memberships, Conferences, And Training	42
7.5.11	Office Supplies.....	42
7.5.12	Travel Guidelines.....	42
7.5.13	Non-Reimbursable Expenses	43
8.	Time Off / Leave of Absences	43
8.1	Holidays	43
8.2	Paid Time Off (PTO) Policy	44
8.2.1	Purpose and Scope	44
8.2.2	Roles and Responsibilities	44
8.2.3	Policy.....	44
8.2.4	PTO Administration.....	45
8.3	Bereavement Policy	47
8.4	Military Leave of Absence.....	47
8.5	Jury Duty.....	48

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		6 OF 49	10-12-2018

8.6	The Family and Medical Leave Act (FMLA) Policy	49
9.	Signing Authority Policy	49
10.	Department of Transportation (DOT)	49
11.	Reporting Gifts from Vendors	49
12.	Benefits Plan	49
13.	Retirement	49

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		7 OF 49	10-12-2018

1. Purpose

1.1 Document Purpose

The purpose of this US Employment Manual (this “Manual” or the “Employment Policies Manual”) is to establish and maintain a uniform system for managing employee matters; to comply with applicable employment law; and to provide for the standards, terms, and conditions of employment with CEDA and any of its direct or indirect subsidiaries (collectively “CEDA” or the “Company”). It is further intended that these policies and procedures, as amended from time to time serve as a guide for employees of the Company in their routine work activities so the objectives of both the Company and individual employees may be achieved.

The policies and procedures set forth in this Manual describe the terms, conditions, and standards of employee operations for the Company, the content of which is neither contractually binding upon the Company nor restrictive in terms of amendment or interpretation by the Company. Employees are expected to acquaint themselves fully with the content of this Manual.

The policies contained in this Manual shall be effective January 2, 2018 and shall be subject to modification by the Company with or without notice as circumstances dictate. These policies supersede and control any prior or pre-existing policies, written or oral.

If any policy or provision contained herein is contrary to law or public policy, the non-enforceability of such policy or provision shall not affect the continuing validity and enforceability of all other policies or provisions.

Please read these policies carefully. If you have any questions regarding the policies stated herein, please contact the Human Resources Department.

1.2 “At Will” Employment

The Company is an "at will" employer. This means that the employment relationship can be terminated with or without cause, with or without notice, at any time, at the option of either the Company or yourself, except as otherwise provided by law. The Company's status as an “at will” employer may not be modified in any way by statements contained in the Employment Policies Manual or any other handouts, guidebooks, employment applications, Company recruiting materials, Company memoranda, or any other materials provided to applicants or employees in connection with their employment. No representative of the Company has the authority to modify this policy for any applicant or employee or to enter into any oral agreement contrary to this policy. Further, only an officer of the Company has the authority

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		8 OF 49	10-12-2018

2. Employment

2.1 Employment Status Categories

The Company categorizes the status of employees in order to make distinctions in benefits and conditions of employment among out employees. Every individual who is in an active work status and receives a paycheck from the Company is considered and active employee.

2.1.1 Regular Full-Time Employees

Regular full-time employees are those that regularly work a minimum of forty (40) hours per week on a continuous basis or in accordance with rotation or calendar schedules.

2.1.2 Regular Part-Time Employees

Regular part-time employees are established into two categories: 1) those that regularly work at least 30 to 39 hours per week on a continuous basis; and 2) those that regularly work 20 to 29 hours per week on a continuous basis.

2.1.3 Temporary Employees

Temporary employees are those that are hired by the Company for a specific, limited period. Contractors or direct service providers are third-party labor support for a specified, limited period.

2.1.4 Contract Workers

Under certain circumstances it may be necessary to hire temporary employees on a contract basis for a specified period of time for a specified project. Contract workers are not employees of the Company, and as such are not party to the terms and conditions of employment stated herein. They are paid strictly for time worked and are not entitled to any other benefits of employments.

Contract workers shall enter into independent contractor agreements with the Company prior to performing any services for the Company. The supervisor should ensure that the contract worker's assignments meet the federal guidelines for independent contractor status and should consult the Human Resources Department if any questions exist. Independent contractors must abide by all federal, state or locally legislated occupational health, safety and environmental requirements. Independent contractors are also responsible for filing all of their own tax reports and making their own contractors are also responsible for filing all of their own tax reports and making their own insurance and tax payments. All temporary and contract workers working at a Company site may be subject to the same background verifications and drug screens as regular, active employees of the Company

2.2 Fair Labor Standards Act ("FLSA") Classifications

The Fair Labor Standards Act (FLSA) is a federal law which requires that most employees in the United States be paid at least the federal minimum wage for all hours worked and overtime pay at time and one-half the regular rate of pay for all hours worked over 40 hours in a workweek.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		9 OF 49	10-12-2018

However, Section 13(a)(1) of the FLSA provides an exemption from both minimum wage and overtime pay for employees employed as bona fide executives/managers, certain administrative employees, professionals and outside sales employees. Section 13(a)(1) and Section 13(a)(17) also exempt certain computer employees. To qualify for exemption, employees generally must meet certain tests regarding their job duties and be paid on a “salary basis” at not less than \$455 per week. Job titles do not determine exempt status. In order for an exemption to apply, an employee’s specific job duties and salary must meet all the requirements of the Department of Labor’s regulations.

Being paid on a “salary basis” means an employee regularly receives a predetermined amount of compensation each pay period on a weekly, or less frequent, basis. The predetermined amount cannot be reduced because of variations in the quality or quantity of the employee’s work. Subject to exceptions listed in the Wage and Salary Policies Section that follows this section, an employee who is paid on a “salary basis” under the FLSA must receive the full salary for any workweek in which the employee performs any work, regardless of the number of days or hours worked. Unless they are taking paid leave, “salary basis” employees do not need to be paid for any workweek in which they perform no work. If the employer makes deductions from an employee’s predetermined salary, i.e., because of the operating requirements of the business, that employee is not paid on a “salary basis.” If the employee is ready, willing and able to work, deductions may not be made for time when work is not available.

2.2.1 Non-Exempt Employee

Non-Exempt Employee denotes any temporary employee or a full-time employee who is not exempt under the FLSA sections described above. All non-exempt employees are required to submit time reports. If you are a "non-exempt" employee and you perform overtime work, you will be paid overtime pay as more fully described in the applicable section of this Manual.

2.2.2 Exempt Employee

Exempt Employee denotes those whose job duties and salaries bring them within one of the FLSA, exemptions. If you are classified as "exempt" you are not entitled to overtime compensation for hours worked in excess of a forty (40) hour workweek.

If you have a question as to whether you are classified as an "exempt" or "non-exempt" employee, please contact the Human Resources Department.

2.3 Employment Offers

All offers of employment are conditional, subject to an applicant's satisfactory results of a background investigation, reference check, production of documents sufficient to demonstrate identity and authorization to work in the United States as required by the Immigration Reform and

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA’S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY		DOCUMENT ID	
	US EMPLOYMENT MANUAL		TM-DC-CORP-001	
			PAGE	REVISION DATE
			10 OF 49	10-12-2018

Control Act, and pre-employment alcohol and drug tests and/or physical assessments, when applicable. The Company's Standard of Practice (SOP) will be to use the North American Substance Abuse Program (NASAP) for Drug & Alcohol Screening and "ExxonMobil – Baytown- General – NABSC" for Background checks, however additional background checks may be required as per client requirements.

2.4 **Internal Transfers/Promotions**

To be considered for a transfer or promotion, employees must meet the minimum qualifications, have a satisfactory performance record and have no disciplinary actions during the last 12 months. Management retains the discretion to make exceptions to the policy.

2.5 **Employment References**

CEDA does not supply employment references.

2.6 **Employment Records**

If you wish to examine your employee file, you must contact the Human Resources Department and review the file with an HR Representative. The contents of the employee file are considered property of the Company and will not be released to the employee.

2.7 **Nepotism, Employment and Personal Relationships**

In general, employment of immediate family members is allowed, provided Vice-President prior approval is obtained prior to extending an offer and there is no direct or indirect reporting conflict of interest. The Company reserves the right to review and take action for any situation where a perceived or actual conflict of interest may exist.

2.8 **Orientation and Training**

Each supervisor is responsible for ensuring that their employees are scheduled for new employee orientation. The Company will provide special training programs for safety and health matters when considered necessary or as required by government regulations.

2.9 **Termination of Employment**

While we hope that your employment with the Company will be long lasting, the employment relationship can be terminated with or without cause, with or without notice, at any time, at the option of either the Company or yourself, except as otherwise provided by law.

2.9.1 **Voluntary Resignations**

Voluntary resignations are classified into the following three (3) categories:

- Written or verbal notification to your supervisor indicating intent to resign;
- Failure to call or show up for work on your scheduled workday within a timely manner for three consecutive workdays; and/or

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		11 OF 49	10-12-2018

- Failure to call or show up for work within a timely manner after being released to work by a doctor from any type of approved medical leave of absence.

You are expected to notify your supervisor that you will be late or unable to report to work before the start of your scheduled workday. While failure to call or show up for work on your scheduled workday within a timely manner for three consecutive workdays is considered a voluntary resignation, in the event that you do not contact your supervisor between the start and end of a single workday, you may be terminated.

Employees are expected to provide a minimum of two weeks' notice to their manager of their intention to separate from the company. It is expected that written notification will be provided to the employee's manager. Quitting without proper notice may result in ineligibility for rehire.

2.9.2 Involuntary Resignations

Involuntary terminations are management initiated terminations. This may include, but are not limited to, employee misconduct, layoffs, reductions and divestitures.

It is impossible to list all specific forms of employee misconduct that are considered unacceptable in the workplace that may lead to an involuntary termination. However, types of misconduct considered inappropriate, include, but are not limited to, poor behavior, tardiness, absenteeism, unsatisfactory performance, dishonesty, insubordination, theft (including company time), damage or misuse of company property, safety violations and policy violations.

In some cases, opportunities to improve behavior or performance may be provided via coaching, verbal counseling, written disciplinary action or performance improvement plans. However, the Company reserves the right to take appropriate disciplinary action up to and/or including termination as determined to be necessary without prior warning or discipline.

2.9.3 Termination Process

Upon termination, your supervisor is responsible for submitting a Termination Form to the Human Resources Department upon earliest notification of termination, voluntary or involuntary. Should you resign without providing notice, your last day worked shall be recorded as the final day of employment. Paid time off will not be granted during the final notice period. Employees are not eligible for any paid holiday which occurs after the last day of work.

Any property issued by the Company must be returned prior to the time the final paycheck is provided. The final paycheck will be issued on the next regular scheduled payday unless mandated otherwise by state law. Final pay will consist of all hours worked from the last pay period to the last day and hour of work, in addition to any accrued hours deemed compensable under Company policy. The final paycheck may be reduced by the amount or value of other setoffs as allowed by

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		12 OF 49	10-12-2018

law and normal deductions required. Upon termination, the Company will withhold the amount of insurance premiums necessary to maintain benefit coverage through the end of the month in which termination occurs. An employee must be actively employed to be eligible for any additional incentive programs and payments.

In addition, all benefits shall cease upon termination with the exception of those indicated in the paragraph above and that may be continued by law under the Consolidated Omnibus Budget Reconciliation Act ("COBRA").

3. Diversity and Anti-Discrimination, Anti-Harassment and Retaliation Policy

3.1 Equal Employment Opportunity Policy

The Company believes that all persons are entitled to equal employment opportunities and does not discriminate against employees or applicants because of race, color, religion, sex (including transgender status, gender identify, or pregnancy), national origin, age, physical or mental disability, protected veteran status, ancestry, genetic information or any other basis protected by federal, state or local law. Equal employment opportunities will be extended to all persons in all aspects of the employer-employee relationship, including recruitment, hiring, benefits, training, promotion, transfer, discipline, layoff and termination.

All employees are required to comply with our Equal Employment Opportunity Policy. Managers and supervisors are expected to cooperate fully in meeting our equal employment opportunity objectives.

3.2 Scope

Any person an employee encounters during the normal course of business is covered by this policy. This includes all applicants and employees regardless of position, title, grade, seniority or function, as well as clients, temporaries, visitors, independent contractors, direct service providers and vendors. No one is exempt from this policy.

3.3 Discrimination

All employment decisions; such as hiring, promoting, training and rewarding, will be made exclusively on the basis of job-related criteria (e.g., employees' knowledge, skills, abilities and performance). Disciplinary actions will be taken solely on the basis of employees' behavior and performance. Discrimination of any kind based on of race, color, age, national origin, sex (including transgender status, gender identity, and pregnancy), religion, veteran status, disability (perceived or actual), genetic information, sexual orientation, marital status, political affiliation, or status as a parent, is prohibited and subject to appropriate disciplinary action.

3.4 Harassment

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		13 OF 49	10-12-2018

Harassment consists of any verbal, written, visual, or physical acts that are offensive in nature, intimidating, unwelcoming, or that could reasonably be perceived as objectionable or interfering with work performance. For example, if an employee engages in conduct intended to provoke someone else, or makes inappropriate comments about a person's race, color, age, national origin, sex (including transgender status, gender identity, and pregnancy), religion, veteran status, disability (perceived or actual), genetic information, sexual orientation, marital status, political affiliation, or status as a parent or the like, those actions likely constitute harassment or discrimination, and therefore, violate this policy. Harassment of any sort by supervisors, managers, co-workers, contractors or vendors will not be tolerated. All employees should maintain a productive and professional work environment characterized by mutual respect.

3.4.1 Sexual Harassment

Sexual harassment refers to behavior of a sexual nature which is unwelcome and personally offensive to its recipient or other witnesses. Sexual harassment is a form of employee misconduct which is demeaning to another person and undermines the integrity of the employment relationship. It is illegal and strictly against the Company's policy for any employee, male or female, to harass another employee by making or subjecting any person to unwelcome sexual advances or requests for sexual favors, or to engage in any unsolicited verbal or physical conduct of a sexual nature. Such actions of a sexual nature constitute "sexual harassment" when:

- submission to such conduct is made explicitly or implicitly a condition of an individual's employment;
- submission to or rejection of such conduct is used as a basis for an employment decision affecting the employee; or
- the harassment has the purpose or effect of unreasonably interfering with the employee's work performance or creating an environment which is intimidating, offensive, or hostile to the employee or other witnesses.

Some examples include, but are not limited to, intentional physical contact that is sexual in nature, sexually oriented propositions, sexual jokes and innuendo (innuendos include suggestive sexual comments), sexual advances or requests for sexual favors, verbal abuse of a sexual nature, commentary about an individual's body, sexual prowess or sexual deficiencies, leering, touching, sexually based obscene comments or gestures, display of sexually suggestive objects or pictures and any other type of physical, verbal or visual conduct of a sexual nature.

Sexual harassment may occur through various methods including, but not limited to, personal contact, in writing, over the telephone, through e-mail, texting and on the intranet. In addition, faxing, emailing, or texting sexually explicit or suggestive materials (to include cartoons) may constitute sexual harassment if the one who sees it is offended, or if someone whom you do not

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		14 OF 49	10-12-2018

intend to see it does see it and is offended. The means by which sexually harassing behavior is conducted does not change its inappropriateness.

3.5 Investigations

In most cases, a prompt investigation will follow the reporting of behavior believed to constitute policy violations. Any such investigation will be designed to address the allegations made, but will usually include interviews of the persons directly involved, witnesses, and review of any documentary items that tend to support or refute the allegations. Investigations will be kept as confidential as practical, but confidentiality cannot be guaranteed.

3.6 Determinations

In instances where sufficient information is available, the Company will promptly make factual and disciplinary determinations about the alleged conduct; however, employees should keep in mind that some inappropriate behavior might not be reflected in documents or witnessed by other people. In those situations, individual credibility determinations will be made. The Company will do its best to gather the most accurate information needed to make a fair and just decision. These credibility issues should not discourage an employee from reporting harassment, intimidation or discrimination, but should illustrate the importance of having documents, witnesses and other information available to assist the Company in reaching its determination. All determinations will be based upon a totality of the circumstances then known by the Company.

3.7 False Claims

Harassment, discrimination and retaliation claims are very serious matters, in part because of the way they can affect people and their careers. Accordingly, while all legitimate claims of harassment, discrimination or retaliation must be reported, such claims must never be fabricated or lodged without the utmost sincerity. Any person found to have intentionally falsified a claim of harassment or discrimination will be terminated.

3.8 Discipline

Upon determination of substantiation of claims, appropriate disciplinary action will be taken. Disciplinary actions may include a range of solutions, from oral or written warnings up to and including immediate termination. This includes first-time offenders. All disciplinary decisions will be made on a case-by-case basis.

4. Workplace Safety

4.1 Drug and Alcohol Free Workplace

4.1.1 Purpose

The policy contained herein is established to ensure a drug and alcohol free workplace at the Company in the interest of the employees and the public. The Company will strive to balance respect for individual privacy with the need to keep a safe and productive work environment;

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		15 OF 49	10-12-2018

however, the Company is committed to, and will aggressively pursue the goal of this policy: to maintain a substance abuse free workplace.

4.1.2 Scope

This document describes the current policy and practice of the Company and its subsidiaries and will be interpreted, administered and amended by the Company within its sole discretion. This procedure is not intended to and does not confer legal rights to any employee or entity or impose legal obligations on the Company. Participation in the Company's Drug and Alcohol Testing program, under both Department of Transportation ("DOT") and non-DOT testing, is a condition of continued employment.

This policy covers all applicants, rehires and current employees, including temporary employees.

Section 4.2 of this document covers additional specific requirements of the DOT and will supplement this policy. Designated CDL Drivers will be accountable under the requirements of this policy.

In order to help protect the public and employees from any individual employees who may be impaired by illegal or prescription drugs or alcohol while performing tasks that could cause serious physical harm, the Company has established the following classifications of employees who are subject to drug and alcohol testing:

Employees who engage in Safety-Sensitive activities which include, but are not limited to, Driver, Operator, Safety Personnel, Swamper, Technician, Specialist hereinafter referred to as "Safety-Sensitive Employees."

All other employees hereinafter referred to as "Other Employees."

4.1.3 Organization Units Affected

All locations are affected, including subsidiaries.

4.1.4 Definitions

- **Company Property** – any building, office, well site, rig site, job site, lease site, Company vehicles or any location where the employee is carrying out duties and responsibilities related to employment by the Company.
- **Controlled Substance Abuse** – includes drugs for which the employee does not have a current, valid prescription or prescribed drugs not being used for prescribed purposes or in a prescribed manner that could have a negative impact on the employee's safety or the safety of others.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		16 OF 49	10-12-2018

- **Designated Employer Representative ("DER")** – an individual designated by the Company to receive communications from the Medical Review Officer ("MRO") concerning drug and alcohol testing. Employees may contact the DER concerning any questions about the Company's DOT and Non-DOT drug and alcohol testing policies.
- **Illegal Drugs** – certain controlled substances, the possession of which is unlawful, pursuant to the laws or regulations of any federal, state or local jurisdiction, or that are legally obtainable but have not been legally obtained, including prescription drugs obtained without a valid prescription, any drug legally prescribed in one jurisdiction but being used in another jurisdiction in which it is currently illegal, or synthetic or other intoxicants where the usage of such may impair a person's judgment or ability to perform safety-sensitive functions are considered to be illegal. For the purposes of this policy, should two jurisdictions overlap and have opposing regulations, laws or rules regarding the legality of a drug, the Company will side with the jurisdiction that is most strict or supersedes the opposing jurisdiction, for example, if a drug is legal in the state of Texas but illegal federally, the Company will side with federal law.

Examples of Illegal Drugs as listed in Schedule 1 of the Controlled Substances Act, include street drugs such as, but not limited to, cocaine, heroin, marijuana, and phencyclidine; controlled substances such as amphetamines, methamphetamines, opiates and barbiturates; and synthetic and other intoxicants such as K-2, Spice, synthetic cannabis, bath salts and Kratom.

- **Incident** – an unplanned, unwanted event that results in loss (i.e. injury/illness, environment release, property/equipment damage, accident or business interruption).
- **Medical Review Officer ("MRO")** – a licensed physician who is responsible for receiving and reviewing laboratory results generated by the Company's drug and alcohol testing program and evaluating medical explanations for certain test result.
- **Other Employees** – employees that do not engage in Safety-Sensitive activities.
- **Random Pool** – for selection purposes, the employee's classification and/or the Company shall mandate which random pool the employee is placed into. The company pool will include all employees designated in a DOT or safety sensitive position as defined in this manual.
- **Random Testing** – includes all Safety-Sensitive Employees of the Company. Employees covered by DOT requirements may also be included in the Company random program. Random testing will be administered at a 50% annualized rate and spread reasonably throughout the calendar year. Accordingly, the total number of tests conducted during any twelve (12) month period will equal at least 50% of each pool of covered employees.

NOTE: Individuals who are not employees of the Company but who are on Company premises as a contractor, direct service provider (DSP) or subcontractor of a Company or as employees of those entities in designated positions will be subject to random drug and alcohol testing at any time pursuant to the previously-referenced Contractor Policy.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		17 OF 49	10-12-2018

- **Safety-Sensitive** – high risk actions or activities in which a mistake could create hazardous conditions that could cause bodily injury and/or property damage. Examples of positions that are Safety-Sensitive include, but are not limited to: Drivers, Operators, Swampers, Safety Personnel, Specialists, Technicians and/or employees who are assigned to a Company vehicle or regularly drive any vehicle on Company business.
- **Sample** – a urine, saliva, hair, breath or blood specimen provided by an individual for the purposes of drug and alcohol testing pursuant to this policy.

4.1.5 Policy Objectives

Employees who use Illegal Drugs or engage in controlled substance or alcohol abuse on or off-duty tend to be less productive, less reliable, and prone to greater absenteeism, resulting in the potential for increased cost, delay and risk in the Company's business. Each employee of the Company has the right to work in a drug-free environment. For these reasons, the Company does not tolerate Illegal Drug use, sale, possession, or Controlled Substance Abuse by any employee, contractor, subcontractor, DSP or temporary employee.

In addition, this policy is intended to comply with the requirements of the Omnibus Transportation Employee Testing Act, the drug-free work force rules declared by the US Department of Transportation, and all other federal agencies, as well as all local, state and federal laws and regulations.

To the extent any portion of this policy is determined to be contrary to the requirements of any of those applicable local, state or federal laws, rules or regulations, it is the intent of the Company to conduct its program prohibiting drug and alcohol abuse in the workplace and any alcohol or substance screening in connection therewith and in accordance with those legal guidelines, and the Company may do so even if this policy has not been modified to address such inconsistencies. Any exceptions to this policy must be approved by the Executive Vice-President of US Operations or COO.

4.1.6 Policy

Upon receipt of the Company's Drug and Alcohol Policy, each manager shall post the policy in a prominent location that is readily accessible to all employees. An employee who is or may be subject to the provisions of this policy will be provided with a copy of the policy prior to its implementation and/or at the time of hire. The Company will also make copies of the policy available to an employee upon request.

4.1.7 Searches and Inspections

The Company reserves the right at all times and without prior announcement to have authorized personnel conduct searches and inspections of an employee's personal effects, including but not

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		18 OF 49	10-12-2018

limited to, lockers, baggage, vehicles and quarters located on Company Property for the purpose of determining if an employee is in possession of any illegal or unauthorized items. These searches will be conducted from time to time without prior announcement. Such illegal and unauthorized items discovered may be taken into custody and turned over to the proper law enforcement authorities. An employee who refuses to be searched or who is found to be in violation of the policy may face disciplinary action up to and including termination. This policy applies to all employees, contractors, DSPs including temporary employees working for the Company.

While working on a client's site, the client has the right to conduct unannounced searches of personnel and property and any refusal to cooperate with the searches will result in the removal of the employee from the client's property.

4.1.8 **Authorized Use of Prescribed or Over-the-Counter ("OTC") Drugs**

An employee undergoing medical treatment with any drugs, whether prescribed or OTC, that may impair his/her physical or mental ability to safely perform his/her duties should immediately report this treatment to his or her supervisor, a safety representative, or a human resources representative. The Company will determine whether a temporary change should be made to the employee's job assignment during the period of treatment. If the use is on-going in connection with a disability (as defined under the Americans with Disabilities Act), the Company will engage in a dialogue with the employee to determine what reasonable accommodation, if any, might be provided.

4.1.9 **Prohibitions**

The Company's Drug and Alcohol Policy prohibits the following:

Use, possession (including in body fluids or tissue), manufacture, distribution, dispensation or sale of Illegal Drugs, equipment and paraphernalia or Controlled Substance Abuse, whether on or off Company Property and whether during working or non-working hours;

- Storing any Illegal Drug in a locker, desk, automobile or other repository on Company Property;
- Testing positive for Illegal Drugs;
- Use, possession (including in body fluids, tissue or breath), sale or distribution of alcohol, or being under the influence of alcohol on Company Property, or in Company supplied vehicles, whether during working or non-working hours, except as authorized by the Company;
- Refusal to consent to or provide a Sample of a drug and/or alcohol test as required by this policy;
- For Safety-Sensitive Employees, being convicted under any criminal drug or alcohol statute for a violation occurring in the workplace or outside the workplace and failing to notify the Company of any indictment or conviction under any criminal drug or alcohol statute

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		19 OF 49	10-12-2018

immediately after the event or before performing any Safety-Sensitive duties for the Company;

- Tampering with or adulterating any Sample submitted for testing, or submitting a false Sample for testing;
- Failure to immediately notify the Company of use of any prescribed or OTC medication which contains warnings or restrictions indicating that use of the medication may jeopardize the employee's ability to safely perform his/her duties; and
- Failure to comply with rules and regulations promulgated under any testing program maintained by the Company pursuant to such rules and regulations.

4.1.10 Testing

The Company has established a testing program for Alcohol, Illegal Drugs and Controlled Substances for all applicants, Safety-Sensitive Employees, and Other Employees.

The Drug and Alcohol Testing Panel, Screen and Confirmatory Test Levels for which the Company tests are listed in Section 4.3 Appendix B.

The Company will use Substance Abuse and Mental Health Services Administration ("SAMHSA") Certified Laboratories for both Non-DOT and DOT testing. All collections will be performed at facilities and/or by on-site technicians that have been trained in proper collection protocols, utilizing the standards established by the DOT.

The Company shall pay all costs associated with initial testing for both Non-DOT and DOT testing. Employees and applicants are responsible for paying the costs of the analysis of any secondary urine specimen which they request under Section 4.1.13 of this Policy, except as otherwise required by applicable state law

4.1.11 Testing Required

The Company reserves the right to conduct Pre-Employment, Return-to-Duty, Pre-Transfer, Random, For Cause/Reasonable Suspicion, Post-Incident, Scheduled-Periodic, Post-Rehabilitation Follow-up, and testing for drugs and alcohol.

Pre-Employment / Return-to-Duty/ Pre-Transfer Testing

The Company will test all applicants for Safety-Sensitive positions, including new employees, rehires, or employees returning to duty. Each offer of employment for a Safety-Sensitive position shall be conditioned upon the successful completion of a test for Illegal Drugs and Controlled Substance Abuse as defined by this policy. Any applicant who is confirmed positive by the Company's Medical Review Officer ("MRO") shall be rejected and may be ineligible for hire for twelve (12) months. If an employee has not previously held a Safety-Sensitive position, the employee will be considered to be an applicant for employment when offered a transfer to a

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		20 OF 49	10-12-2018

Safety-Sensitive position. In that event, to the extent permitted by applicable law, the employee will be tested in connection with the transfer into a Safety-Sensitive position.

Random Testing

All Safety-Sensitive Employees will be subject to random drug and alcohol testing at any time with no advance notice. Each random draw from the pool will ensure each employee in the pool an equal chance of selection. Any Safety-Sensitive Employee may be tested at random more than once per year.

For Cause/Reasonable Suspicion Testing

When the Company has reasonable belief that an employee, whether Safety-Sensitive or Other Employees, has used Illegal Drugs or engaged in Controlled Substance Abuse or prohibited alcohol use, whether during working hours or non-working hours, on or off Company Property, the Company may require the employee to submit a Sample for testing For Cause/Reasonable Suspicion, as outlined by the Company policy.

The decision to test must be based on a reasonable and an articulated belief that the employee is using an Illegal Drug, Controlled Substance or prohibited alcohol on the basis of specific, contemporaneous physical, behavioral, or performance indicators of probable Illegal Drug use, Controlled Substance Abuse or prohibited alcohol use.

In making a determination of reasonable belief, the factors that may be considered include, but are not limited to, the following:

- Adequately documented pattern of unsatisfactory work performance (including excessive or unexplained absenteeism or tardiness), for which no apparent non-impairment related reason exists, or change in an employee's prior pattern of work performance, especially where there is some evidence of drug-related behavior on or off the work site;
- Physical signs and/or symptoms consistent with Illegal Drug or prohibited on-the-job alcohol use or Controlled Substance Abuse or a report of drug or alcohol use while at work or on duty;
- Other evidence of Illegal Drug use, possession, sale, or delivery while on or off duty or other evidence of on-the-job alcohol use or Controlled Substance Abuse;
- An Incident or an occurrence of a serious or potentially serious Accident that may have been caused by human error, or any violation of established safety, security, or other operational procedures.
- Reasonable Suspicion testing will be based on similar factors in those jurisdictions where that category of testing is controlled by applicable statutes.

Post-Incident Testing

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		21 OF 49	10-12-2018

Provided the criteria for an Incident is met, the Company shall take all reasonable steps to test employees whose performance either contributed to the Incident or cannot be completely discounted as a contributing factor to the Incident. As such, any employee, whether Safety-Sensitive or Other Employees, is required to undergo Post-Incident drug and alcohol testing as soon as possible when the employee or another person has sustained a work-related injury or property has been damaged, including damage to equipment. Unless impossible due to the circumstances, the drug test must be conducted no later than thirty-two (32) hours after the incident and the alcohol test must be conducted within two (2) hours after the incident. If the alcohol test is not conducted within two (2) hours, the supervisor must document the reason the test was not administered and should conduct the test no later than eight (8) hours after the incident. In the event of unforeseen circumstances, if the drug and alcohol tests are not conducted within thirty-two (32) hours and eight (8) hours respectively, the supervisor shall prepare and maintain written documentation as to why the tests were not performed within the maximum time limits. For purposes of this section, property shall include, but not be limited to: personal, government, company, customer or any other type of property.

If an employee is injured, unconscious, or otherwise unable to provide consent to the test, the Company will request that the hospital or medical facility obtain a sample (i.e., urine, blood, saliva, breath, hair). If an employee is conscious and he or she is able to provide consent to the test, the sample shall be collected. If an employee who is subject to Post-Incident testing is conscious, able to provide a test Sample normally (in the opinion of a medical professional) and refuses to be tested, that employee may be terminated.

While waiting for a reasonable cause or post-Incident drug or alcohol test result, the employee involved in the incident, whether directly or indirectly, may be removed from his/her Safety-Sensitive duties and not allowed to return to work on a client's premises until documentation has been received showing the negative result. For purposes of Workers Compensation or Unemployment Compensation, no employee who tests positive for the presence of Illegal Drugs or alcohol or Controlled Substance Abuse shall be eligible for such compensation unless the employee proves by a preponderance of the evidence that the Illegal Drug or alcohol use or Controlled Substance Abuse was not the proximate cause of the injury or accident.

If the employee has been removed from performing his/her Safety-Sensitive duties and/or a client's work site and the test result is negative, then the employee may return to performing his/her Safety-Sensitive duties and a client site immediately.

Following a positive test the employee will be removed from client premises and not permitted to perform work on behalf of CEDA or any of its customers.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		22 OF 49	10-12-2018

Scheduled-Periodic Testing

Any employee, whether Safety-Sensitive or Other Employees, may be required to undergo drug or alcohol testing as a part of routine scheduled testing for a particular group or classification of employees, e.g., Safety-Sensitive or a group of employees in a particular location.

Post-Rehabilitation Follow-up Testing

Any employee, whether Safety-Sensitive or Other Employees, may be required to undergo drug or alcohol testing without prior notice for a period of up to two (2) years commencing with the employee's return to work following participation in a drug or alcohol dependency treatment.

Records

The Company shall maintain, as confidential records, separate from other employee records of an employee and/or an applicant, all drug and alcohol test results and related information, including, but not limited to, interviews, reports, statements and memoranda. Upon request, an employee or applicant tested shall be provided those documents for inspection and copying. Testing and all related records are the property of the Company.

4.1.12 Medical Review Officer (MRO) – third party

As a condition of employment or consideration for employment, any applicant or employee subject to testing must authorize the release of test results to the Company's MRO and the disclosure of the results by the MRO to the Company's Designated Employer Representative ("DER"). The MRO will obtain the results of the analyses and communicate or disclose such results to the Company's DER in accordance with the Company's Drug and Alcohol policy. The DER may use such information in connection with company business and for purposes of employment and disciplinary action, and disclose it when required by court or administrative order or upon written permission of the employee to government agencies and to others.

Prior to taking any action, the MRO will give any employee who tests positive the opportunity to explain in confidence the test results. If the MRO determines that a legitimate medical reason does exist, the test result will be reported to the Company as "negative." If the MRO determines that a legitimate medical reason does not exist, the test result will be reported to the Company as a "confirmed positive." Failure of any employee to adequately establish a legal or medical basis in the opinion of the MRO for the presence of any Illegal Drug or alcohol or Controlled Substance Abuse shall constitute a violation of this policy.

4.1.13 Re-Test/Appeals Procedures

If the MRO determines there is no legitimate legal explanation for a confirmed positive test result other than the unauthorized use of an Illegal Drug or alcohol or Controlled Substance Abuse, the original specimen must be re-tested if the employee or applicant submits an appeal to the DER in writing within seventy-two (72) hours of receipt of the final test result from the MRO. The applicant

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		23 OF 49	10-12-2018

or employee may specify re-testing by the original laboratory or by a second laboratory that is SAMHSA certified. The re-test will be at the employee or applicant's expense unless the re-test is negative, at which time the employee or applicant will be eligible for reimbursement for his/her cost. If the re-test comes back negative, the employee will be reinstated and receive back pay.

If the employee specifies re-testing by a second laboratory, the original laboratory must follow approved chain-of-custody procedures in transferring a portion of the specimen. Except as set forth above, there are no other rights of appeal from any personnel decisions made in connection with this Policy including the Appendices to the Policy.

4.1.14 **Consequences for Violations of the Drug and Alcohol Policy**

The Company reserves the right to take disciplinary action, up to and including termination, based on any drug or alcohol test confirmed by the MRO or any other violation of this policy.

An employee who fails a drug or alcohol test or refuses to submit to testing as required by this policy or the Company may be subject to immediate termination.

If an employee tests non-negative as a result of a Post-Accident or For Cause/Reasonable Suspicion instant or rapid test, that employee may be immediately removed from his/her Safety-Sensitive duties. The employee will not be allowed to return to his/her Safety-Sensitive duties unless the tests are confirmed negative by the MRO. If the test is confirmed positive by the MRO, the employee may be terminated.

Any employment action taken as a result of a violation of this policy will be final and not eligible for appeal.

4.2 **Drug and Alcohol Policy, Appendix A DOT**

4.2.1 **Purpose**

This Appendix supplements the Company's general Drug and Alcohol policy with the requirements of the U.S. Department of Transportation ("DOT"), Federal Motor Carrier Safety Regulations ("FMCSR") found at 49 CFR 40 and 382 for drug and alcohol programs for certain employees engaged in certain transportation related activities.

It is the Company's intention to comply fully with the DOT's regulations governing drug and alcohol use and testing, and the requirements of DOT's regulations have been incorporated into this Policy for employees and applicants subject to testing under the DOT regulations. In the event DOT's regulations are amended, this Policy and the applicable term(s), condition(s) and/or requirement(s) of this Policy shall be deemed to have been amended automatically at that time, without the need for redrafting, in order to reflect and be consistent with DOT's regulations. In

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		24 OF 49	10-12-2018

such case, the Company reserves the right to apply the amended requirements immediately, and without giving prior notice to employees, drivers and/or applicants, unless such notice is required by DOT or another applicable law. Additionally, employees may be subject to drug and/or alcohol testing in accordance with other federal statutes, regulations or other Company drug and alcohol testing programs.

4.2.2 Scope

This Appendix applies to all CDL Drivers as defined below.

4.2.3 Definitions

Actual Knowledge – for purposes of the prohibitions listed in this Appendix means knowledge by the Company that a CDL, as defined below, has used alcohol or controlled substances based on the Company's direct observation of the employee, information provided by the employee's previous employer(s), a traffic citation for driving a CDL Vehicle while under the influence of alcohol or controlled substances, or an employee's admission of alcohol or controlled substance use, except as provided in Section 382.121 of the FMCSR. Direct observation as used in this definition means observation of alcohol or controlled substance use and does not include observation of employee behavior or physical signs sufficient to warrant Reasonable Suspicion testing.

Commercial Driver's License ("CDL") – a driver's license required to operate a CDL Vehicle, as defined below.

Commercial Motor Vehicle ("CDL Vehicle") – for purposes of this Appendix, vehicle(s) used in either interstate or intrastate commerce and meeting any of the following criteria:

- Has a Gross Vehicle Weight Rating ("GVWR") greater than twenty-six thousand (26,000) pounds; or
- Has a Gross Combination Weight Rating greater than twenty-six thousand (26,000) pounds, including trailer(s) with a GVWR greater than ten thousand (10,000) pounds; or
- Is designed to transport sixteen (16) or more passengers, including the Driver; or
- Is of any size and is used to transport hazardous materials in a quantity that requires the Vehicle to have placards under the Hazardous Materials Regulations.

Commercial Driver's License Driver ("CDL Driver" or "Driver") – an employee who possess a valid Commercial Driver's License and can be expected to operate a Commercial Motor Vehicle, as defined above, that is owned, operated or leased by the Company, supervisors of such employees, and any person designated to manage or administer the Company's drug and alcohol testing programs.

Pool – a group of individuals subject to controlled substance and alcohol random testing, per the FMCSR and as identified in this Appendix; CDL Drivers shall be placed in the FMCSA Pool.

	POLICY		DOCUMENT ID	
	US EMPLOYMENT MANUAL		TM-DC-CORP-001	
			PAGE	REVISION DATE
			25 OF 49	10-12-2018

Refusal to submit - means any of the following: (a) failing to provide an adequate urine specimen for a drug test without a valid medical explanation; (b) failing to provide adequate breath for an alcohol test without a valid medical explanation; (c) failing to submit to a test as directed; (d) failing to cooperate with any part of the testing process; (e) wearing a prosthetic or other device that could be used to interfere with the collection process; (f) admitting to or adulterating or substituting the specimen; or (g) engaging in any conduct which clearly obstructs the testing process.

Safety-Sensitive Functions – for purposes of this Appendix, means:

All time from the moment the CDL Driver begins to work or is required to be in readiness to work until the time the Driver is relieved from work and all responsibility for performing work. This includes, but is not limited to:

- all time at a Company plant, terminal, facility, or other property, or on any public property, waiting to be dispatched, unless the employee has been relieved from duty by the Company;
- all time inspecting equipment as required by Sections 392.7 and 392.8 of the FMCSR or otherwise inspecting, servicing, or conditioning any CDL Vehicle at any time;
- all time spent at the driving controls of a CDL Vehicle in operation;
- all time, other than driving time, in or upon a CDL Vehicle;
- all time loading or unloading a Vehicle, supervising or assisting in the loading or unloading, attending a Vehicle being loaded or unloaded, or remaining in readiness to operate the Vehicle; and
- all time repairing, obtaining assistance, or remaining in attendance upon a disabled CDL Vehicle.

4.2.4 Prohibitions

A CDL Driver covered under this Appendix is subject to disciplinary action, up to and including termination, for violating any of the following prohibitions found in Part 382 of the FMCSR.

Alcohol concentration. No CDL Driver shall report for duty or remain on duty requiring the performance of Safety-Sensitive Functions while having a Blood Alcohol Concentration (“BAC”) of 0.04 or greater. No supervisor having Actual Knowledge that a Driver has a BAC of 0.04 or greater shall permit the Driver to perform or continue to perform Safety-Sensitive Functions.

A CDL Driver will be removed from his/her position for a period of twenty-four (24) hours for a BAC greater than 0.02 but less than to 0.04, and may be subject to disciplinary action per the Company’s Drug and Alcohol Policy.

On-duty use. No CDL Driver shall use alcohol while performing Safety-Sensitive Functions. No supervisor having Actual Knowledge that a Driver is using alcohol while performing Safety-

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		26 OF 49	10-12-2018

Sensitive Functions shall permit the Driver to perform or continue to perform Safety-Sensitive Functions.

Pre-duty use. No CDL Driver shall perform Safety-Sensitive Functions within four (4) hours after using alcohol. No supervisor having Actual Knowledge that a Driver has used alcohol within four (4) hours shall permit a Driver to perform or continue to perform Safety-Sensitive Functions.

Use following an accident. No CDL Driver required to take a post-accident alcohol test as defined by this Appendix shall use alcohol for eight (8) hours following the accident or until he/she undergoes a post-accident alcohol test.

Refusal to submit to a required alcohol or controlled substances test. No CDL Driver shall refuse to submit to a post-accident alcohol or controlled substances test, a random alcohol or controlled substances test (Employees are not required to submit to random alcohol testing), a Reasonable Suspicion alcohol or controlled substances test, or a follow-up alcohol or controlled substances test as required by the FMCSR Regs. No supervisor shall permit a Driver who refuses to submit to such tests to perform or continue to perform Safety-Sensitive Functions.

Controlled substance use. No CDL Driver or Employee shall report for duty or remain on duty requiring the performance of Safety-Sensitive Functions when the employee uses any controlled substance, except when the use is pursuant to the instructions of a licensed medical practitioner, as defined in Section 382.107 of the FMSCR, who has advised the employee that the substance will not adversely affect his/her ability to perform Safety-Sensitive Functions.

No supervisor having Actual Knowledge that a Driver has used a controlled substance shall permit the Driver to perform or continue to perform Safety-Sensitive Functions.

A Driver undergoing treatment that includes prescription medication classified as a controlled substance must immediately notify his/her supervisor. The Driver may also be required to furnish the Company a written statement from a licensed medical practitioner that the medication will not adversely affect his/her ability to perform Safety-Sensitive Functions.

Controlled substances testing. No CDL Driver shall report for duty, remain on duty or perform a Safety-Sensitive function, if the Driver tests positive or has adulterated or substituted a test specimen for a controlled substance. No supervisor having Actual Knowledge that a has tested positive or has adulterated or substituted a test specimen for a controlled substance shall permit the Driver to perform or continue to perform Safety-Sensitive Functions.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		27 OF 49	10-12-2018

Confirmed positive test. A CDL Driver who receives a confirmed positive test may be subject to disciplinary action up to and including termination or such other consequences that may be required or permitted by the FMCSR Regs.

Failure to adhere to or comply with the above prohibitions may result in disciplinary action, up to and including termination.

4.2.5 Testing

The DOT has established the following cutoff levels for controlled substance and alcohol tests. Controlled substance levels are measured in nanograms per milliliter (ng/ml). Alcohol level is measured in BAC.

<u>Substance</u>	<u>Screen Level</u>	<u>Confirmation Level</u>
Alcohol	0.02%	0.02%
6-acetylmorphine	10 ng/ml	10 ng/ml
Amphetamines	500 ng/ml	---
Amphetamine	---	250 ng/ml
Methamphetamine	---	250 ng/ml
Cocaine	150 ng/ml	100 ng/ml
Ecstasy (MDMA)*	500 ng/ml	250 ng/ml
MDMA**	---	250 ng/ml
MDEA***	---	250 ng/ml
Marijuana (THC)	50 ng/mL	15ng/mL
Opiates (including)	2000 ng/mL	---
Codeine	---	2000 ng/ml
Morphine	---	2000 ng/ml
Phencyclidine (PCP)	25 ng/ml	25 ng/ml

*Methylenedioxymethamphetamine

**Methylenedioxyamphetamine

***Methylenedioxyethylamphetamine

4.2.6 Testing Required

Pre-employment or pre-transfer

An applicant or current employee applying for a position requiring the performance of Safety-Sensitive Functions, as defined in this Appendix, must submit to a DOT pre-employment controlled substance test. A verified negative result must be received by the Company before the employee begins performing Safety-Sensitive Functions.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		28 OF 49	10-12-2018

Post-Incident

CDL Drivers are required to submit to post-accident testing. Testing for alcohol should be administered within two (2) hours of the accident, but not later than eight (8) hours. Testing for controlled substances shall be administered as soon as possible following the accident but not later than thirty-two (32) hours. If the test is not administered within the time frames described above, the supervisor shall document the reasons for not administering the test and provide this documentation to the DER.

A surviving CDL Driver involved in a CDL Vehicle accident must submit to a post-accident controlled substance and alcohol test, if the Driver was performing Safety-Sensitive Functions in a CDL Vehicle, under the following circumstances:

- The accident involves the loss of human life; or
- The employee receives a citation for a moving violation arising from the accident, if the accident involved:
- Bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or
- One or more motor vehicles incurring disabling damage as a result of the accident, requiring the motor vehicle to be transported away from the scene by a tow truck or other motor vehicle.

Random

Each CDL Driver subject to this Appendix will be placed in a random controlled substance and alcohol testing pool. Names in these pools are randomly drawn by computer by a third party approved vendor. Unannounced random selections are made throughout the calendar year. The FMCSR Regs require that at least 50% of Drivers and will be randomly tested each year for controlled substances, and at least 10% of Drivers be randomly tested each year for alcohol misuse. For CDL Drivers randomly chosen for an alcohol test, the test is administered immediately before, during, or immediately after performing Safety-Sensitive Functions.

An employee who performs both Federal Motor Carrier Safety Administration (FMCSA) functions shall be placed in the pool in which the majority of his/her work is performed. CDL Drivers may also be placed in the Company's Drug and Alcohol Policy controlled substance and alcohol random testing pool.

Reasonable Suspicion

A supervisor who has successfully completed the training requirements in Section 382.603 of the FMCSR Regs may direct a CDL Driver subject to this Appendix to undergo a Reasonable Suspicion controlled substance and/or alcohol test. The decision to test under this part is made by a supervisor's direct observation of the Driver's behavior that suggests controlled substance or alcohol use; before testing, the supervisor must concur with another supervisor. The concurrence

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		29 OF 49	10-12-2018

by both supervisors can be accomplished by phone, by discussions, or by having another supervisor travel to the job site, if only one trained supervisor is available at that particular job site.

Return-to-Duty

A return-to-duty test must be conducted and passed after a CDL Driver successfully completes an education and/or treatment program directed by a qualified Substance Abuse Professional ("SAP") and before any Safety-Sensitive Function is performed.

Follow-up

Follow-up tests are conducted after a CDL Driver begins performing Safety-Sensitive Functions subsequent to education and/or treatment for substance abuse. Follow-up testing is done at a rate determined by the SAP, but at a minimum includes at least six (6) unannounced tests during the first twelve (12) month period after returning to duty. The SAP may direct testing be done on a more frequent basis and also determines the type(s) of tests to be done.

4.2.7 **Result of Positive Test/Refusal to Test**

Any employee subject to DOT testing who violates these provisions will be subject to disciplinary action mandated by the DOT. A CDL Driver whose test result is confirmed positive for drugs will be considered unqualified to perform or continue performing his or her functions safely and will be immediately terminated. In addition, a CDL driver whose test result is confirmed positive for drugs will also be subject to civil and criminal penalties imposed by DOT.

A driver who, after providing an adequate breath specimen, has a confirmatory test which registers 0.04 or greater will, at a minimum, be suspended without pay until his or her next regularly-scheduled duty period, but for no less than twenty-four (24) hours, and will be subject to additional disciplinary action by the Company, up to and including termination.

Any CDL Driver who has a verified positive controlled substances test result, has an alcohol concentration of 0.04 or greater or refuses to submit will be subject to additional disciplinary action by the Company, up to and including termination.

4.2.8 **Records**

All controlled substance and alcohol test results are kept strictly confidential by the Company and will be released only in accordance with DOT and/or FMCSA Regs. See Sections 40.321, 382.405 of the FMCSA for more information. DOT test records will be maintained separately from Non-DOT test records.

4.3 **Health, Safety, and Environmental Policy**

US employees are covered by all CEDA Parent policies. Health, safety and environmental policies are available on the company intranet through your local administration.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		30 OF 49	10-12-2018

4.4 Weapons Policy

The Company strictly prohibits the carrying or possession of a weapon, ammunition or explosives, whether concealed or unconcealed, by an employee, guest, or invitee anywhere on Company property, in Company vehicles, or while on Company business (exceptions to this policy may apply and are described below). Violation of this policy is cause for disciplinary action, up to and including termination. All employees are responsible for notifying the Vice President of Operations, a supervisor or the Human Resources Department about any potential violations of this Policy. If at any time you feel that you are in imminent danger, please contact 911.

4.5 Security/Visitors

Employees are expected to exercise reasonable care to maintain the safety and security of the Company's and their own personal property. In order to ensure the safety and security of Company employees, visitors, and property, and to ensure that only authorized personnel have access to Company property, visitors at any of the Company office locations are required to check in and must be escorted by an employee at all times.

4.6 Smoke Free Workplace

Smoking or vaping is only allowed in designated areas. Smoking or vaping is not permitted anywhere in the Company's office buildings, vehicles or shops. If you smoke or vape, you must do so only in the designated areas or off Company premises.

5. Workplace Expectations

5.1 Outside Employment

The Company expects that the Company is the sole employment for all full-time employees. Any outside activity must not interfere with the employee's ability to properly perform his or her job duties at the Company. If you have outside employment, you are required to disclose this in writing to your manager who will thoroughly evaluate any potential conflict to make sure that there will not be any interference with your employment responsibilities with the Company. Your Vice President reserves the right, in his or her sole discretion, to accept or decline your outside employment if a conflict of interest is established.

5.2 Business Hours

The Company reserves the right to establish the time and duration of working hours as required by work load, the efficient management of human resources, and any applicable laws.

5.3 Attendance

Attendance at work is a vital portion of every person's position. Staff members are expected to arrive at work as scheduled by the business and be prepared to begin the work day.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		31 OF 49	10-12-2018

Patterns of absenteeism, tardiness or unscheduled time off may result in discipline even if the employee has not yet exhausted available paid time off. Absences due to illnesses or injuries that qualify under the Family and Medical Leave Act (FMLA) will not be counted against an employee's attendance record. Medical documentation within the guidelines of the FMLA may be required in these instances.

Employees are expected to notify his/her supervisor if the Employee will be late or unable to report to work before the start of his/her scheduled workday. In the event the Employee fails to contact his/her supervisor between the start of his/her scheduled workday and the end of the workday, the Employee may be terminated. Failure to call or show up for work on time on his/her scheduled workday for three consecutive workdays is considered voluntary resignation and will be regarded as job abandonment. However, CEDA reserves the ability to terminate employment for failing to call or show up for work on time on any occasion.

5.4 **Dress Code and Personal Experience**

Employees are expected to dress appropriately according to the requirements of their positions while working at the Company. It should be a matter of personal pride with every employee to keep clean and neat at all times while they are in the employ of the Company. Shorts, ripped or disheveled clothing, athletic wear or clothing which displays vulgar, racially expressive or sexually explicit wording or pictures is strictly prohibited. Sandals and similarly inappropriate shoes are not acceptable. All field, shop and hourly employees are expected to dress in compliance with safety standards including the usage of Company approved Fire Resistant Clothing and other personal protective equipment, when required, while on the job site. If an employee is visiting or located in the Houston corporate office, the employee must follow the corporate clothing guidelines.

5.5 **Social Media Policy**

The Company understands that social media is a common way to share your life and opinions with family, friends and co-workers. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

This Policy applies to all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with the Company, as well as any other form of electronic communication ("Social Media Communication"). Illustrative examples of social media sites include, but are not limited to, Facebook, Instagram, Twitter, LinkedIn, Wikipedia, Blogger, Instant Messenger, SnapChat, MySpace, FourSquare, YouTube, Vimeo, online forums, and many more.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		32 OF 49	10-12-2018

This Policy applies to any Social Media Communication, whether it occurs during working hours or non-working hours. This Policy applies to any Social Media Communication, whether transmitted or received on personal devices and networks or transmitted or received through devices and networks provided by the Company. The Company reserves the right to monitor and review any Social Media Communications as permitted by law.

5.5.1 **Using Social Media at Work**

Refrain from using social media while on working time or on equipment the Company provides, unless it is work-related as authorized by your manager. Use of social media which interferes with or detracts from job performance is prohibited. Do not use the Company's email addresses to register on social networks, blogs or other online tools utilized for personal use.

5.5.2 **Confidential Information**

Maintain the confidentiality of the Company's trade secrets, confidential information, customer information or attorney-client privileged information. This may include, but is not necessarily limited to, information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.

5.5.3 **Be Honest and Accurate**

Make sure you are always honest and accurate when posting information or news. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about the Company, fellow employees, business associates, customers, suppliers or people working on behalf of the Company.

5.5.4 **Be Respectful**

Always be fair and courteous to fellow associates, customers, members, suppliers or people who work on behalf of the Company. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly to your co-workers or your supervisor by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers or that might constitute harassment. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of sex, race, disability, religion or any other status protected by law or company policy.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		33 OF 49	10-12-2018

6. Information Technology-Acceptable Use Policy

6.1 Purpose

The Company provides computing equipment and network infrastructure to empower its employees and service our customers. This Acceptable Usage Policy (“AUP”) governs the use of the Company’s network and computing assets, in addition to local, state and federal law.

6.2 Scope

All Company employees, contractors, temporary employees, third party personnel, network and computing assets are subject to this policy.

6.3 Usage

Occasional use of the network and computing assets for personal use are permitted however users must be aware that the services provided are tools for performing their job functions. Usage must:

- not interfere with job responsibilities or duties;
- be of reasonable duration and frequency;
- not be pornographic, obscene, unlawful, encouraging of unlawful conduct, threatening, defamatory, vulgar, hateful, racially or ethnically offensive, and/or insensitive; and
- not violate any other company policies

All hosts connected to the corporate network must be continuously running antivirus software.

Users are encouraged to perform small maintenance tasks on their computer like defragmenting and disk drive cleanup. Users should not apply operating systems or application updates to their systems without contacting the IT Department for assistance.

6.4 Unacceptable Usage

This section defines some of the activities that are not permitted on the Company’s computing and network assets. Exceptions to these and other restrictions may be considered following a review by the IT Department.

6.4.1 Network Activities

Intentional introduction of malicious programs into network or computing assets is unacceptable. Malicious programs include, but are not limited to, viruses, worms, and back doors. Users are prohibited from using software designed to identify and/or exploit system vulnerabilities

Forging protocol headers to circumvent the Company’s network security infrastructure or to hide an attack on internal or external networks is unacceptable.

The use of monitoring software that surreptitiously captures traffic not intended for the user is unacceptable.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		34 OF 49	10-12-2018

Generating unnecessary traffic that impacts the performance of the Company's networking and computing assets or those of a third party is unacceptable.

Using the network for trafficking, creating or storing illegal materials is unacceptable. This includes, but is not limited to, copyrighted works, obscene, discriminatory, or defamatory images or verbiage. This includes storage of such materials on the Company's servers. Be advised that the Company may employ technologies to restrict the trafficking of such materials. If the Company discovers any materials that violate state federal or international statutes, it will report such violations to the appropriate authorities and comply fully with any investigation.

6.4.2 Local Computer Activities

Users may not assign fixed IP addresses to their company computer without the written consent of the IT Department.

Users may not run server services on their systems. This includes web servers, database servers, and FTP servers. These services often have vulnerabilities that can be used to compromise the user's system.

Users are not permitted to allow others to use their computer. This includes other Company employees, family members and other third parties.

Users are prohibited from installing software for which the user or the Company does not have a license.

Users are prohibited from removing the operating system from their computer and installing a different operating system or reinstalling the previous.

Users are prohibited from connecting any computer, other than their issued workstation, to the Company network.

Users are prohibited from installing or removing any hardware components from CEDA assets.

6.5 E-Mail Usage

All e-mail addressed to domains owned by the Company is the property of the Company. At any time a user's e-mail may be forwarded to another employee without the user's consent.

All outgoing and incoming e-mail traffic is logged. Users are not to forward Company e-mail to an address not owned by the Company for the purpose of archiving. Personal email accounts may not be used for conducting Company business. However, in certain situations personal email accounts may be necessary for system access purposes and notifications.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		35 OF 49	10-12-2018

The Company employs the use of virus scanners on its e-mail gateways to protect the networking and computing assets. These gateways must be sole ingress and egress points for e-mail. Users are prohibited from using other means (i.e. POP3 or IMAP) to fetch e-mail from servers outside of the Company's network as this provides a vector for infection.

Users are prohibited from using the e-mail system to send unsolicited e-mail messages for outside commercial ventures, religious or political causes, and outside fraternal organizations. Messages that contain hate speech, defamatory, discriminatory, harassing offensive or inappropriate sexual references are prohibited. Likewise, messages that contain derogatory or inflammatory remarks about race, age, disability, religion, national origin, physical attributes or sexual preferences are also prohibited. Users are advised that the Company has the ability to employ technology to control messages prohibited by this AUP.

6.6 **Mobile Phones and Other Personal Devices**

Mobile phones, cell phones, and other similar personal devices may be provided to employees for Company use. These devices are subject to the same Usage and Unacceptable Usage guidelines as other Company systems and/or technologies. In addition, personal use of these devices should be minimal and should never interfere with the performance of job duties or subject the Company to additional costs. These devices should be password protected and users must report any lost or stolen device to the Vice President of Operations within 24 hours. Users are required to ensure that their use of these devices does not interfere with the safe operation of any equipment or motor vehicles.

6.7 **Security**

The Company employs various technologies to assure the security of its networking and computing assets. No attempt should be made to bypass these systems.

To assure the best possible level of protection, the Company's firewalls and screening devices must be the sole ingress and egress points between the internet and the Company's internal networks. Likewise, users are not permitted to establish connections to external networks or hosts through dial-up, radio frequency, or tunneling without the consent of the IT Department.

From time to time a user may witness or even initiate a security incident. If you believe that either has occurred, you should advise the IT staff immediately.

Anti-Virus software is required to be installed and running on all computers connected to the Company network. The software will be installed and configured by the IT Department. Antivirus software is not to be disabled without written consent from the IT Department. Third party

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		36 OF 49	10-12-2018

contractors with their own computers are required to have antivirus software installed on that equipment.

Employees are responsible for safeguarding assets and must immediately report lost, damaged or stolen equipment. Employees may be held liable.

Users must follow other Company policies regarding security including confidentiality and proprietary information.

6.8 Passwords

Passwords are not to be divulged to anyone including the Company IT Department. The IT Department will never ask a user for his or her password. If you are requested to provide your password, you should report the incident to your supervisor and the IT Department. Users are discouraged from writing passwords on paper as paper can be misplaced compromising the password(s).

Employees should not use the same password for Company resources that is used to access personal internet or other information services.

A user that believes that a password has been compromised must report the incident to the IT Department immediately.

Please contact the IT Department for comprehensive information about the use and creation of passwords.

6.9 Privacy

The Company asserts its ownership of all data created, stored and transmitted across its network. The Company reserves the right to audit and review all data created, stored and transmitted across its network. Users are advised that they have no expectation of privacy on the Company network and computing assets except where prescribed by federal or state statutes.

6.10 Enforcement

Users found to have violated this policy will be subject to disciplinary action up to and including termination. Third party users in violation will have their access terminated and the project suspended.

7. Compensation

7.1 Paydays and Manner of Payment

The Company publishes the pay schedule that can be found with the employee's administrator. The Company's third party payroll provider is Paychex.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		37 OF 49	10-12-2018

7.2 Payroll Timekeeping

The company administrator is responsible for timesheet administration. Timesheets are approved by local management and paid as approved. Should there be a discrepancy, written approved timesheet documentation shall prevail. Should CEDA have processed inaccurate payments, employee pay will be rectified on the next scheduled pay from when the issue was identified.

7.3 Overtime Pay

From time to time, the Company may require an employee to perform overtime work in order to meet business operation needs. When it is necessary to work overtime, you will be asked to cooperate as a condition of your employment. Only non-exempt employees are entitled by law to receive overtime pay. Eligible employees are required to record and report all incidents of overtime hours worked at the time such additional hours are worked.

All overtime must be authorized in advance. Working overtime without a supervisor's pre-approval may result in disciplinary action up to and including termination. Unapproved overtime will not be paid.

Under applicable federal and state law, non-exempt employees who perform overtime work will be paid at time and a half for actual hours worked over forty (40) in the workweek. At times, employees may work different types of work at different pay rates; in those instances the employee's compensation may be computed using the "weighted average" method. However, those employees who will be paid using the "weighted average method" will receive a direct communication from the Company. All employees will be paid according to the FLSA guidelines.

Time off for any reason, including but not limited to Paid Time Off ("PTO") or holidays, will not be counted in determining overtime compensation as these hours do not represent actual hours worked.

7.4 Garnishments and Other Deductions

Deductions from an employee's gross pay period earnings are of two types: mandatory and voluntary. Mandatory deductions are those required to be made by the Company by law, court order or other legal influence. Such deductions include state and federal income tax withholding, social security and wage garnishments. Voluntary deductions are those requested by an employee to be made on his/her behalf and may include such items as the employee's contributions to health insurance, optional retirement plans, savings accounts and charitable organizations.

Mandatory deductions will be made automatically by the Company in accordance with applicable legal requirements. In the case of mandatory deductions such as state and federal income tax, where CEDA must rely on information provided by an employee, it will be the sole responsibility

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		38 OF 49	10-12-2018

of the employee to provide legally accurate information. The applicable mandatory federal withholding tax rate will be used for any supplemental salary payments.

Attachments made to employee paychecks by legal authority of wage garnishment, regardless of cause, will be regarded as a mandatory deduction in the amount and for the time specified in the order. Employees are discouraged from involving the Company in their personal financial matters. Employees subject to garnishment withholding may be required to pay a fee which reimburses the Company for administrative costs associated with processing the order.

Voluntary deductions will not be made without the employee's written consent or authorization, except where permitted by law and Company policy.

7.4.1 Deductions For Exempt Employees Pay

As previously discussed, exempt employees are paid on a “salary basis,” which means only certain deductions are allowed from their pay. In addition to the deductions set out above, the FLSA permits deductions from pay when an exempt employee is absent from work for one or more full days for personal reasons other than sickness or disability; for absences of one or more full days due to sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing compensation for salary lost due to illness; to offset amounts employees receive as jury or witness fees, or for military pay; or for unpaid disciplinary suspensions of one or more full days imposed in good faith for violating Company policy. Also, the Company is not required to pay the full weekly salary in the initial or terminal week of employment, when penalties are imposed in good faith for infractions of safety rules of major significance, or in weeks in which an exempt employee takes unpaid leave under the Family and Medical Leave Act. In these circumstances, either partial-day or full-day deductions may be made.

7.4.2 Company Policy Regarding Improper Deductions

It is the policy of the Company to comply with the salary basis requirements of the FLSA and the Company does not allow deductions that violate the FLSA. Therefore, the Company prohibits all Company managers from making any improper deductions from the salaries of exempt employees.

7.4.3 What To Do If An Improper Deduction Occurs

If you believe that an improper deduction has been made, immediately report this information to your direct supervisor or to the company timekeeper.

Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, you will be promptly reimbursed for any improper deduction made.

The Company will not allow any form of retaliation against individuals who report alleged violations of this policy or who cooperate in the investigation of such reports. Retaliation is

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		39 OF 49	10-12-2018

unacceptable, and any form of retaliation is a violation of this policy and will result in disciplinary action, up to and including termination.

7.5 Expense Reimbursement Policy

7.5.1 Purpose

The purpose of this policy is to:

- Ensure each employee has a clear and consistent understanding of the policies and procedures for business travel and expenses;
- Provide the appropriate level of accounting and business controls to ensure that expenses are reviewed and approved appropriately; and
- Identify reimbursable versus non-reimbursable expenditures.

7.5.2 Scope

This policy applies to each employee engaged in business practices on behalf of the Company.

7.5.3 Definitions

1. Accountable Reimbursement Plan – the type of Internal Revenue Service (“IRS”) reimbursement plan under which reimbursements for travel, entertainment and non-travel business expenses are not required to be reported as income to the employee. Under the accountable reimbursement plan, travel reimbursement of expenses must meet three requirements:

- a. Reimbursements must be made only when the travel, entertainment or non-travel business expenses directly benefit the Company;
- b. All business expenses must be substantiated with the date, amount, place, and business purpose of the expense being submitted to the employer within a reasonable time period (within 90 days will be deemed reasonable). Specific documentation requirements are noted throughout this policy; and
- c. Any amount paid to the employee that is more than the documented, business-related expense must be returned to the Company.

Any expenses that fail to meet all three rules for the accountable reimbursement plan **must be treated as income** to the employee and reported to the IRS on Form W-2 (subject to withholding of employment taxes) or Form 1042-S (subject to section 1441 withholding), as applicable.

2. Reasonable Expenses - defined as that which enables an employee to live comfortably, but not extravagantly while away from home. Every employee is expected to:

- a. Exercise good judgment with respect to their expenses; and
- b. Spend the Company’s money as carefully and judiciously as the employee would their own.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA’S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		40 OF 49	10-12-2018

3. **Good Business Practice** - requirement that all expenditures be clearly and correctly recorded; any unusual items or amounts must be fully explained.

7.5.4 Policy

It is the policy of the Company to pay for or reimburse an employee for actual, reasonable, and proper expenditures incurred in the conduct of the Company's business. Such expenditures shall be reasonable in amount and proper in nature. All reimbursements will be made in accordance with the IRS "accountable reimbursement plan" provisions.

7.5.5 Responsibility

It is the responsibility of each employee to understand and comply with this policy prior to submitting expenses for reimbursement. Any questions should be directed to the employee's immediate supervisor. The employee's supervisor who approves the expense report is responsible for accurately reviewing each expense for compliance. The Company assumes no obligation to reimburse an employee for expenses that are not in compliance with this policy.

7.5.6 Enforcement

Any employee who does not comply with this policy may be subject to delay or withholding of reimbursement and/or, disciplinary action, up to and including termination.

7.5.7 General Guidelines

Expense reports must be received within ninety (90) days after completion of a trip or the date on which an entertainment or non-travel business expense was incurred.

Any claim for reimbursement received more than ninety (90) days after the completion of the trip or the date on which an expense was incurred may be considered taxable income to the employee per IRS guidelines.

An original, itemized receipt must be provided in order to be reimbursed for business-related expenditures. An exception may be allowed for reasonable, miscellaneous expenditures (gratuities, parking, baggage handling, etc.) whereby receipts may not be readily available. Expense reports will be subject to periodic audits; therefore, every employee is encouraged to keep hard copies of their original, itemized receipts for a minimum of one (1) year from the date the expense was incurred.

In addition to the original, itemized receipt, an employee must provide the following information in order to be reimbursed for all entertainment and/or non-travel related expenses:

1. Names of individuals present, their titles and company name;
2. Name and location of where the meal or event took place;

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		41 OF 49	10-12-2018

3. Business reason for the expense; and
4. Exact amount and date of the expense.

Each employee is responsible for paying for his/her own business and travel expenses, except for travel expenses that are required to be booked through CEDA Travel.

Expense Reports must be submitted to the employee's immediate supervisor.

Reimbursements for approved expense reports will be made on your next paycheck through the regular payroll cycle.

This policy and associated procedures apply to employee business and travel expenses only. Reimbursement for any other type of expense, including relocation and/or COBRA, is not covered under this policy.

An employee who leaves the Company must submit their final business and travel expense report **within thirty (30) calendar days from the employee's last day worked**. The Company accepts no obligation for any expense reports submitted after the 30th day.

7.5.8 Meals – Employee Only

Overnight Business Trip Meals

1. Meals purchased by an employee traveling away from home overnight on company business are reimbursable expenses.
 - a. Generally, when two or more employees who are traveling dine together on company business, the most senior level employee shall be responsible for payment of the meal expense and submission of the total expense on his/her expense report. The guidelines outlined in the "Meals or Entertainment – Group" section should be followed in this circumstance.

Day Trip Meals

1. In general, meals consumed during day trips which do not include overnight travel are not reimbursable. For example, coffee purchased and consumed while traveling to or from a work location is not reimbursable. Reimbursement for day trip meals for trips that extend beyond the Company's normal working hours may be given special consideration by an employee's immediate supervisor.

7.5.9 Meals or Entertainment – Group

An employee will be reimbursed for reasonable business-related meals and entertainment in any one of the following circumstances:

1. When a client is present;

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		42 OF 49	10-12-2018

2. When at least one company employee is from out of town;
3. When, for confidentiality reasons, business must be conducted off company premises; or
4. When two or more employees who are traveling dine together on company business and the most senior level employee pays for the meal.

Business meals and entertainment expenses will be reimbursed only in cases when the expense is directly related to, or associated with company business. Requests for reimbursement for these types of expenses must be pre-approved by the employee's department head and will only be granted if:

1. Business relationships, ordinary and necessary to maintain and promote the Company's business interests are the motivating factor of the entertainment event or meal.
2. Discretion is used in all business meals and entertainment activities and the number of participating employees is kept to a minimum and supported by good business practices and prudent judgment.
3. Business meals and entertainment expenses are reasonable and are not considered lavish or extravagant.

Casual lunches between/among employees will not be reimbursed.

Departmental charges and catering from company restaurants must comply with these guidelines.

Expenses for an employee's personal entertainment are not reimbursable.

Gifts to employees are not reimbursable.

7.5.10 **Dues, Memberships, Conferences, And Training**

The Company may also reimburse for certain professional certifications, dues, memberships, and continuing education requirements for an employee belonging to professional associations directly related and beneficial to the employee's work duties. All certifications, conferences, memberships, organization fees or dues submitted for reimbursement must be pre-approved by the employee's immediate supervisor and accompanied by a detailed receipt, invoice or registration form.

7.5.11 **Office Supplies**

In general, office supplies are not a reimbursable expense. Please contact your local administrative support for more information.

7.5.12 **Travel Guidelines**

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		43 OF 49	10-12-2018

The Company has an established travel procedure that must be followed.

7.5.13 Non-Reimbursable Expenses

Examples of non-reimbursable expenses include, but are not limited to, the following:

- a. Personal car repair
- b. Credit card interest charges
- c. ATM fees
- d. Daycare for children or pets
- e. Fees for upgrades of air, hotel, auto
- f. Golf cart rental or caddy fees
- g. Golfing or green fees
- h. Grooming, nail or hair salon expenses
- i. Headphones on airlines
- j. Laundry (not reimbursed for trips less than three days)
- k. Massages
- l. Medicines (cold medicine, aspirin, etc.)
- m. Personal books, magazines, or other entertainment
- n. Sporting events
- o. Spouse's expenses if accompanying employee on business trip
- p. Toiletries
- q. Theatre, cinema or opera tickets
- r. Traffic citations (parking tickets or fines)
- s. Birthday cakes/cards unless presented for reimbursement by the department head

8. Time Off / Leave of Absences

8.1 Holidays

Regular exempt and non-exempt full-time employees are eligible to receive their regular rate of pay for each observed holiday. Based upon your qualifying status you may be eligible to receive up to 8 hours of pay per holiday at straight time. Temporary employees are not eligible for paid holidays.

An employee on any leave is not eligible to receive holiday pay.

A holiday that occurs on a Saturday or Sunday generally will be observed by the Company the following Monday. If your regular work schedule requires you to work during the holiday, you are not entitled to time off. You will be paid according to your holiday pay schedule.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		44 OF 49	10-12-2018

If a holiday occurs during an employee's PTO period, the employee will be granted holiday pay on the observed holiday instead of reducing the employee's paid leave available.

Annually the company will determine the number of paid holidays based on company performance and publish the paid holidays for all classifications of employees through the company timekeeper.

The company reserves the right to:

- a) Change the number of paid holidays annually
- b) Reduce or eliminate holidays at any time through the calendar year with no employee notice.

Operational, non-exempt employees who work hours on a holiday will be paid at a rate of 1.5x the hourly wage for all hours worked that day.

8.2 Paid Time Off (PTO) Policy

Not all employees are eligible for PTO, only full time permanent staff are eligible. Contractors, DSPs and temporary staff are not eligible for PTO. If you are eligible for PTO you may not use it before it has been earned. If you have any questions regarding your PTO please contact the company timekeeper.

8.2.1 Purpose and Scope

This PTO policy is designed to outline PTO eligibility and entitlement for all United States CEDA employees. CEDA recognizes that employees benefit from both physically and mentally from taking planned breaks from work, therefore, all employees are expected to use the full amount of their PTO on an annual basis as required by this policy. Annual PTO at CEDA is granted in accordance with the legislative bodies in the United States.

8.2.2 Roles and Responsibilities

a. Employees

Are expected to adhere to the policy, submit PTO requests and have PTO pre-approved and to use all PTO entitlement as set by policy.

b. Managers/Supervisors

Are expected to make all reasonable efforts to grant employee PTO requests, subject to operations requirements. Managers/Supervisors are responsible for ensuring that all employees' earned PTO is taken in accordance with this policy, approved and reported with the appropriate completed form to payroll and/or HR as required.

8.2.3 Policy

PTO is granted to CEDA employees based on their individual hire date with the company. They are provided for scheduled days off and the time does not accrue.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		45 OF 49	10-12-2018

No time is earned for months an employee is on Leave for any reason.

PTO is earned in hours each month for both exempt and non-exempt employees as follows:

Administrative Employees (Exempt and Non-Exempt)	PTO	Earned per month
1 to 5 years of employment	10 days/year	6.67 hours/month
6 to 9 years of employment	15 days/year	10.00 hours/month
10+ years of employment	20 days/year	13.34 hours/month
Managerial/Supervisory Employees	PTO	Earned per Month
1 to 5 years of employment	15 days/year	10.00 hours/month
6+ years of employment	20 days/year	13.34 hours/month
Non-Exempt Paid Operational Employees	PTO	Earned per month
1 to 5 years of employment	10 days/year	6.67 hours/month
6+ years of employment	15 days/year	10.00 hours/month

Employees are paid for eight (8) hours per day at straight time when taking PTO time, based on a submitted/approval time off request form.

8.2.4 PTO Administration

a. PTO Request

In all instances of requesting PTO, regardless of position, a time off request form must be submitted to an employee's manager for approval. All approved requests must be forwarded to payroll. Employees must schedule PTO in advance (30 days if possible) to ensure minimal operational impact. While CEDA will make every attempt to honor an employee's PTO request, it is the manager's discretion to approve PTO. The time off request form is accessible to all employees and can be found with the local timekeeper or administrator.

In the event that an employee and their manager cannot mutually agree on scheduling PTO, the manager will select the dates in which PTO will be taken by the employee. In these circumstances managers will inform employees of scheduled PTO at least two weeks in advance.

PTO does not accrue and is only available during the calendar year as an allotment of approved scheduled days off.

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		46 OF 49	10-12-2018

Failure for the employee to submit a time off request form and gain approval from his/her manager prior to taking time away will result in an unauthorized day off.

b. Receiving PTO Pay

Employees earn PTO each month based on their vacation eligibility and entitlement. PTO is paid in the form of an employee's regular bi-weekly paycheck while they are on vacation. Employees are eligible to take PTO only after completion of one full year of employment. All earned PTO must be taken within the year eligible.

c. Termination and Resignation

No PTO is paid when an employee is terminated for any reason or resigns their employment.

d. Earning PTO While on Leave

An employee on approved leave of absence does not earn PTO for the period of time that employee is on leave. Approved absences during which PTO does not earn include the following:

- approved medical leave
- approved personal leave of absence
- Workers' Compensation Leave
- Family Medical Leave
- Short Term or Long Term Disability

Employees on an approved leave of absence do not incur a break in service for the purpose of calculating PTO. Therefore, an employee's eligibility for additional vacation based on years of service is not affected by his/her leave of absence.

It is important for employees to understand that taking leave of any kind may cause them to have taken more PTO in a calendar year than they had fully earned. Repayment of any overtaken PTO will be handled on an individual basis.

e. Calendar Year End Reconciliation

At least three months prior to the calendar year-end, a reconciliation of an employee's earned annual PTO, compared to PTO taken, will be conducted.

The procedure for the year end reconciliation is as follows:

- Three (3) months prior to year end, a report of all outstanding PTO balances, or over-takes, will be sent to each manager to review with Human Resources. Following confirmation that an overpayment/overtake situation exists, the employee will be notified in writing of the amount, and the solution to the issue will be agreed upon by the manager and employee with the written agreement returned to payroll for

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		47 OF 49	10-12-2018

administration. All PTO not scheduled during the calendar year is forfeited at December 31st of that calendar year.

f. **Compliance**

Compliance with this policy is mandatory by all employees and managers. Failure to comply may result in disciplinary action up to and including termination of employment.

g. **All instances of non-compliance with this policy shall be reported to the HR Department directly or through any supervisor.**

h. **No payouts of PTO not attached to schedule time off will be permitted.**

i. **No PTO is owed at termination regardless of the reason for termination of employment.**

8.3 **Bereavement Policy**

Active, regular employees who complete the first 90 days of employment are eligible for paid bereavement leave. Bereavement leave does not carry forward to subsequent years.

An employee who wishes to take time off to plan funeral arrangements and/or attend funeral services for an immediate family member should notify his or her supervisor immediately. An employee's immediate supervisor authorizes the use of bereavement leave and may require forms to authenticate the need for bereavement leave. Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements.

Bereavement pay is calculated on the base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, bonuses, overtime and shift differentials. There will be no prepayment made in advance of use, or any payment made for unused bereavement leave upon termination of employment whether voluntary or involuntary.

An employee is allowed up to three (3) days off from his/her regular work schedule with regular pay in the event of the death of the employee's spouse, domestic partner, child, father, father-in-law, mother, mother-in-law, brother, sister, stepfather, stepmother, stepbrother, stepsister, stepson, stepdaughter, grandfather or grandmother, brother-in-law, sister-in-law, son-in-law, daughter-in-law, grandfather-in-law, grandmother-in-law, aunt, uncle or cousin.

The death or imminent death of your spouse, child, parent or grandparent may warrant special consideration of an extended absence from work. Time off beyond available paid bereavement leave will first be charged against your available PTO. As circumstances warrant, once PTO is depleted, unpaid time will be used to extend bereavement period.

8.4 **Military Leave of Absence**

It is the Company's intent to protect the job rights and benefits of those who serve or seek to serve our country in the Armed Forces of the United States. These rights include any employee who is returning from active duty or from reserve training on duty. The Company provides unpaid leave

PRINTED COPIES OF THIS DOCUMENT ARE CONSIDERED UNCONTROLLED/INFORMATION ONLY COPIES. THE CONTROLLED VERSION IS LOCATED ON CEDA'S INTRANET. THIS DOCUMENT MAY NOT BE COPIED OR REPRODUCED IN ANY FORM WITHOUT THE EXPRESS WRITTEN CONSENT OF CEDA.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		48 OF 49	10-12-2018

for any employee who is required to attend annual training or service with a branch of the United States military or any reserve or National Guard units. At the employee's option, accrued PTO can be substituted for all or a portion of this unpaid leave. Employees should notify as soon as possible of the dates they will be absent due to military leave.

If an employee is drafted or enlists in active duty in a branch of the United States military, the employee may be entitled to reinstatement with the Company at the end of such service. In this regard, the Company strictly complies with applicable federal statutes, including but not limited to the Uniformed Services Employment and Reemployment Rights Act ("USERRA").

A regular, full-time employee who applies for re-employment within ninety (90) days of the military discharge will be returned to his/her former job or an available one of like status and pay. There is no guarantee, however, that the previous or a similar job will be available except under circumstances as required by law. Time off during an approved military leave of absence will be counted as time worked for the purpose of calculating the employee's seniority.

An employee who is a member of the National Guard or other United States military reserve unit will be granted temporary military leave to facilitate participation in the unit's temporary active duty and annual training programs. A temporary military leave, usually two (2) weeks per year, may be approved without pay by the Company and will not be charged against the employee's PTO unless so requested. Military service which exceeds thirty (30) days during any one year period will be considered a military leave of absence.

A regular, full-time employee who leaves the Company to enter U.S. military service under a selective service or similar act, regardless of whether the employee volunteers, is drafted, or is called to duty as reservist or national guardsman, will be considered as being on an approved leave of absence. Group life and health care benefits may not be continued after active military duty commences. The employee will be eligible for COBRA benefits.

8.5 Jury Duty

You are entitled to a leave of absence to attend legally required jury duty. A copy of your summons notice for jury duty must be submitted to your supervisor. Your supervisor should be notified on the first working day after you have received the notice. During your period of jury service, you are expected to report to work on any days or partial days that you are not required to be in court. When you report back to work at the conclusion of jury duty, you should present proper evidence provided by the court of your jury service.

If you have completed your first 90 days of employment, you will be paid your normal salary or hourly rate for a maximum of eight (8) hours per day for ten (10) business days. You will be allowed to retain any mileage and other compensation paid by the respective court jurisdiction.

	POLICY	DOCUMENT ID	
	US EMPLOYMENT MANUAL	TM-DC-CORP-001	
		PAGE	REVISION DATE
		49 OF 49	10-12-2018

8.6 The Family and Medical Leave Act (FMLA) Policy

CEDA complies with all Family and Medical Leave Act policies.

9. Signing Authority Policy

CEDA has a designated Delegation of Authority policy that all staff will comply with.

10. Department of Transportation (DOT)

All employees in a DOT position are required to comply with DOT regulations.

11. Reporting Gifts from Vendors

You must report all gifts from vendors to your supervisor.

All employees must sign the Company's Business Code of Conduct.

Employees of the Company are prohibited from engaging in activities with vendors that promote personal interests ahead of the interests of the Company or otherwise create a conflict of interest. Any employee's solicitation or acceptance of a kickback, bribe, cash payment, or loan from a vendor is a violation of Company policy. Employees are not permitted to accept cash in any amount.

Any vendor who violates Company policy will be subject to removal from the Company's approved vendor list. Any employee who violates this policy may be subject to termination and/or possible legal sanctions.

12. Benefits Plan

CEDA provides a healthcare plan to its full time permanent employees. The benefits booklet and program details can be found on the company Intranet or with the local administrator.

13. Retirement

CEDA has a retirement plan in the form of a 401(k) plan available to its employees. Copies of the plan can be found on the company intranet or with the local administrator.