



EMPLOYEE MANUAL

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Welcome,

We at Compass are committed to offering construction services of exceptional quality and value to our customers. Our goal is to work with highly capable and innovative employees who are dedicated to the highest standards of the industry.

You play a vital role in Compass' success. To achieve that success, Compass strives to create a positive work environment, which unites employees in their enthusiasm for Compass, its products and services. Compass strives for a high level of quality. You have been chosen to help meet this standard. Take pride in your work. Your behavior is a reflection of you, your co-workers, and Compass.

As you begin your career with Compass, I assure you that your contributions will be greatly appreciated. Your suggestions and ideas are what help us continually improve standards of excellence. I look forward to a mutually rewarding future.

Sincerely,

A handwritten signature in blue ink that reads 'Frank Stauff'.

President

Section 1 - Introduction

1.1 **About Compass Construction**

The construction business is a service oriented process. We are entrusted with the dreams of clients, taking their designs for success and putting them into a 3-dimensional form. Our clients put their trust in us to provide them with a product that matches their expectations and will survive the test of time.

Because of this, we need to always focus on the needs of our clients and perform our tasks in such a manner that will maintain their trust and confidence. Developing our client list and client retention is completely related to the quality of our work and client satisfaction. It should be an experience worth repeating for all parties involved.

The following is a list of “Steps for Success” that should be incorporated into each employee’s daily routine and work ethics to help all of us achieve client and personal satisfaction in our work:

Always be the Owner’s Advocate – You are an advocate for the client in the construction process. The client should always feel like you have “got their back” by scrutinizing extra costs and budgeting, being clever and creative in the work, troubleshooting the construction documents and always looking to improve the schedule.

Maintain “To-Do” Lists – Organization skills are critical. This construction process is too complicated to not keep a list of action items. It is expected that Compass employees will, at the end of each day, generate a short bullet list of things that have to be accomplished or acted on the next day and, as necessary, add to the list at the start of the next day. This is expected to become a ritual for each Compass employee.

Don’t Procrastinate the “Big Stuff” – Start each day with the philosophy of “what are the biggest challenges that must be tackled”...and then attack those items first. This philosophy will keep the fires out on the project. Don’t default to doing the small, easy stuff first.

Be the expert of your project – It is a Compass mandate to build the project on paper first during the pre-construction process so when the work commences, it runs smoothly and efficiently. Plan and schedule everything, assume nothing. This approach will solidify Owner and Consultant confidence in their respect for you and your value as a member of the team.

Quality is job #1 – Compass has a reputation of producing quality work. Only provide a quality product...”a job worth doing is a job worth doing right”.

Mandate to Work Safely – The construction process is also a dangerous process. Never cut corners when it comes to safety. Observe all safety regulations and never walk away from an unsafe jobsite condition. All sites must be kept clean and organized, which is a prerequisite to a safe site. It is expected that every field and office employee on our jobsites will go home each night without injury.

1.2 Welcome

If you are a new employee to Compass, we welcome you to our team. We hope your association with Compass will be mutually beneficial and pleasant. If you have been an employee with us for some time, we hope you continue to find satisfaction in your work and take pride in Compass.

For all employees, this MANUAL is a compilation of policies and procedures (both written and unwritten) that have developed over time. This MANUAL is intended to reduce any confusion that may arise from unwritten or inconsistent policies and, therefore, supersedes any previous oral or written statements of policies that may be inconsistent with this MANUAL.

This MANUAL applies only to employees. Throughout this MANUAL, when the general term “employee” is used without further qualification, it refers to persons who have a direct employment relationship with Compass and who are classified by Compass as its employees for payroll tax purposes – regardless of how those persons might be classified in the future by a court, government agency, settlement, or otherwise.

Compass fully intends to comply with all applicable laws in the various locations where it operates and has attempted to consider those laws in preparing these policies. Even so, if a policy is inconsistent with any applicable law, Compass will follow the law. If you have questions about a particular location or situation, please contact a Company Manager.

Spend the time to review and understand this MANUAL. If you have any questions about this MANUAL, your job, or any job-related issue, please feel free to ask.

1.3 Open Door Policy

Compass is committed to maintaining a positive and pleasant environment in which to work and believes in an Open Door policy. You are encouraged to see your immediate supervisor with suggestions, questions or problems relating to your job. You can also contact the Human Resources Manager, or any other management representative, without regard to his or her position within Compass.

While this procedure cannot result in every problem being resolved to your satisfaction, Compass values your input and you should feel free to raise issues of concern.

1.4 At-Will Employment

THIS MANUAL HAS BEEN PREPARED AS A GUIDE AND REFERENCE FOR ALL EMPLOYEES. THE PLANS, POLICIES, AND PROCEDURES DESCRIBED ARE NOT CONDITIONS OF EMPLOYMENT AND DO NOT CONSTITUTE A PROMISE OF SPECIFIC TREATMENT IN SPECIFIC SITUATIONS. WE HAVE THE RIGHT TO CHANGE ANY OR ALL PLANS, POLICIES, OR PROCEDURES, IN WHOLE OR IN PART, AT ANY TIME, WITH OR WITHOUT NOTICE. THE LANGUAGE USED IN THIS MANUAL IS NOT INTENDED TO CREATE, NOR DOES IT CONSTITUTE, A CONTRACT BETWEEN THE COMPANY AND ANY OF ITS EMPLOYEES. EMPLOYMENT WITH THIS COMPANY IS FOR NO SPECIFIED TIME AND MAY BE TERMINATED BY THE COMPANY OR BY THE EMPLOYEE, AT ANY TIME, FOR ANY REASON (WITH OR WITHOUT CAUSE). ONLY THE COMPANY *PRESIDENT*, AND THEN ONLY IN WRITING, CAN ALTER THIS EMPLOYMENT "AT-WILL" POLICY.

1.5 *Your Human Resources Department*

Our Human Resources Department consists of various internal contacts and our HR Manager who handles day-to-day Human Resource questions can always be reached at hr@compass-gc.com.

Section 2 – Employment

2.1 *Equal Employment Opportunity*

Compass is an equal opportunity employer. We believe every employee has the right to work in an environment that is free from all forms of unlawful discrimination. Consistent with applicable laws, Compass makes all decisions involving any aspect of the employment relationship without regard to race, color, sex, pregnancy, creed, religion, age, marital or nursing mother status, national origin, ancestry, citizenship, the presence of any sensory, mental, or physical disability, medical or genetic information, military or veteran status, sexual orientation, gender identity, gender expression, or any other status or characteristic protected by applicable local, state, or federal law. Discrimination and/or harassment based on any of those factors are inconsistent with our philosophy of doing business and will not be tolerated. This policy of non-discrimination applies to all aspects of recruiting and employment, including compensation, benefits, advancement, transfers, and reductions in force.

Compass will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the President, or (c) consistent with Compass's legal duty to furnish information.

2.2 *Disability and Accommodation*

Compass is committed to ensuring equal employment opportunity for qualified persons with disabilities in accordance with the Americans with Disabilities Act and other applicable federal, state, and local laws. As provided by those laws, Compass will make reasonable accommodations if you have a disability that substantially limits your ability to perform the essential functions of your job or if working without accommodation would aggravate a disability such that it would create a substantially limiting effect in the future unless doing so would create an undue hardship for Compass. What constitutes a reasonable accommodation is decided on a case-by-case basis.

If you have a disability and need a reasonable accommodation, you should make that fact known to your supervisor or human resources. We will treat such information as confidential except to the extent other employees need to know to evaluate your request for an accommodation or to accommodate your disability. You are not required to disclose a disability unless you are seeking an accommodation.

In order to evaluate options for accommodation, Compass may request medical opinions to verify the nature of your disability, identify potential reasonable accommodations, or determine whether your continued work would pose a direct threat to the health or safety of others that cannot be eliminated by reasonable accommodation.

2.3 Unlawful Discrimination and Harassment

Introduction

Compass is committed to providing a work environment that is free of unlawful discrimination and unlawful harassment. Unwelcome actions, words, jokes, or comments based on an individual's race, color, sex, pregnancy, creed, religion, age, marital or nursing mother status, national origin, ancestry, citizenship, the presence of any sensory, mental, or physical disability, medical or genetic information, military or veteran status, sexual orientation, gender identity, gender expression, or any other legally protected characteristic will not be tolerated. Individuals who experience or observe possible unlawful harassment or discrimination are strongly encouraged to report their concerns without fear of reprisal. We take these matters very seriously and will make every effort to ensure that complaints of harassment or discrimination are resolved promptly, effectively, and as confidentially as possible.

So that each employee has a better understanding of the type of behavior that is prohibited, sexual and other prohibited harassment are briefly discussed below.

Sexual Harassment

Sexual harassment is a form of unlawful harassment by members of the same or opposite sex. In general, it involves unwelcome conduct that is of a sexual nature or based on gender.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different genders. Depending on the circumstances, behaviors that constitute sexual harassment may include, but are not limited to, the following: unwanted sexual advances or requests for sexual favors; sexual jokes or innuendo; verbal abuse of a sexual nature; comments about an individual's body, sexual prowess, sexual experience, practice or desires, or sexual deficiencies; leers, whistles, or touches; insults or obscene comments or gestures; display of sexually suggestive objects or pictures; and other physical or verbal conduct or visual material of a sexual nature. Compass does not tolerate sexual harassment of its employees on the job, regardless of whether the unwelcome behavior is by co-workers, supervisors, managers, vendors, or clients. Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as business trips, business meetings, and business-related social events.

State and federal anti-discrimination laws prohibit harassment when:

- submission to or rejection of such conduct is used as the basis of a tangible employment action affecting the individual, such as decisions relating to hiring, firing, promotions, assignments, or pay; or,
- the conduct creates an intimidating, hostile, or offensive work environment that affects the terms and conditions of a person's job.

Other Prohibited Harassment

Like sexual harassment, we strictly prohibit harassment on the basis of any other legally protected characteristic, such as race, ethnicity, national origin, age, disability, religion, citizenship, veteran status, or sexual orientation and political ideology.

Prohibited harassing conduct may include inappropriate jokes or innuendo; epithets, slurs, or negative stereotyping; display in the workplace of offensive materials; and other physical or verbal conduct or visual material.

Supervisory Oversight

We expect all supervisors to take affirmative steps to protect employees from unlawful harassment. This includes demonstrating and communicating appropriate standards of workplace conduct, monitoring such conduct, and promptly reporting any alleged incidents or concerns to the next level of management, the HR Manager (hr@compass-gc.com), or to the President.

Reporting Procedures and Guidelines

Compass encourages all employees to report any perceived incident of discrimination, harassment, or retaliation, regardless of the offender's identity or position. Anyone who believes that he or she is a recipient of such conduct by any manager, employee, vendor, customer, or client of Compass should do the following:

- If it is comfortable and practical for you to do so, identify the offensive behavior to the offender and request that it stop.
- If it is not comfortable or practical for you to confront the offender directly, or if you have done so and the behavior is continuing, promptly notify your direct supervisor, the HR Manager (hr@compass-gc.com), or the President.

ANY COMPLAINTS THAT COMPASS CONSTRUCTION POLICIES HAVE BEEN VIOLATED WILL BE FOLLOWED BY A FAIR, TIMELY, AND THOROUGH INVESTIGATION THAT PROVIDES ALL PARTIES WITH DUE PROCESS AND REACHES REASONABLE CONCLUSIONS BASED ON THE EVIDENCE COLLECTED. WE PROHIBIT RETALIATION FOR REPORTING SUCH CONCERNS OR FOR COOPERATING WITH ANY INVESTIGATION, AND WE TAKE REASONABLE STEPS TO ENSURE THAT THE COMPLAINING PARTY DOES NOT SUFFER REPRISALS OR RETALIATION.

The investigation will be conducted as discretely as possible, consistent with the need to investigate.

Discipline

If an investigation shows that any manager or employee has engaged in harassment or discrimination against any coworkers, independent contractors, interns, and/or volunteers in violation of our policy, Compass will take appropriate disciplinary action or corrective measures, including, but not limited to, mandatory counseling, training, additional supervision, transfer, change of job duties, removal of supervisory responsibilities, demotion, suspension, or termination of employment. This list is illustrative only. Compass, at its sole discretion, will determine the level of disciplinary action or corrective measure that is appropriate in any specific situation. This policy does not create a mandatory step or progressive disciplinary policy and does not in any way alter Compass's status as an "at-will" employer or create a contract between an employee and Compass with respect to the level of disciplinary action appropriate in any situation.

2.4 New Employee Orientation

It is our goal that new employees receive a general orientation conducted by a representative of the Human Resources Department. The orientation includes completion of new hire paperwork, a review of the employee Manual, and a review of employee benefits. Your supervisor provides a tour of the facility, introductions to other employees, and an explanation of job responsibilities. Questions about your job should be directed to your supervisor.

We are an open door company; we encourage you to share your questions, problems, concerns, and suggestions.

2.5 Eligibility for Employment

In accordance with the U.S. Citizenship and Immigration Service's requirements, we will ask you to verify your employment eligibility. This means you must provide us with documents that establish your identity and eligibility for U.S. employment. All employees will be required to supply this documentation within three business days of their date of hire.

2.6 Hours of Work

Each employee's supervisor will assign actual scheduled hours of work. You may be required to work extra hours as business conditions dictate. Non-exempt employees will be paid overtime as required by law (see section 3.1).

2.7 Rest Breaks and Meal Breaks

Non-exempt employees will receive a thirty-minute, unpaid meal break if they work at least a five-hour shift. It is your responsibility to ensure you take a lunch break. Meal break times will be assigned by your supervisor.

Non-exempt employees will also receive one ten-minute rest break for every four hours worked. Rest breaks will be scheduled unless due to the nature of the job they can be taken on an informal basis throughout the day. Rest breaks will be considered time worked for pay purposes. Rest breaks must be taken approximately mid-way through the four-hour work period and may not be taken immediately preceding or following the meal break or at the beginning or end of the workday.

2.8 Termination of Employment

While we hope your employment with us will be long and mutually rewarding, the length of that employment is not for any fixed term and may be terminated either by you or Compass, at any time, for any reason (with or without notice or cause).

Voluntary

If you decide to leave Compass voluntarily ('resign'), we request 2 weeks' notice be provided to your supervisor. As part of your resignation, you will be asked to complete an Employee Resignation Letter. Compass, at its option, may at any time, either allow you to work during this notice period or conclude your work and provide you with pay in lieu of notice. Any accrued vacation / sick pay or bonuses shall be forfeit with your resignation.

Involuntary

An involuntary termination is any termination of employment initiated by Compass. Compass retains sole discretion, within the confines of the law, on whether any notice or consideration will be provided to involuntarily terminated employees (only an Officer of the Company may agree to provide such notice or consideration and such agreements must be in writing and signed by the Officer).

If you are involuntarily terminated or laid off, you will receive notice from the Human Resources department regarding the effect the termination has on your employee benefits and which programs may be continued at your expense.

At Time of Termination

On, or before, an employee's last day the following items shall be turned in to the supervisor –

- Keys (site / field office / main office)
- Compass provided petty cash / credit cards
- Compass provided computer, software, templates, files (physical & digital), and/or any other equipment or materials provided for your use
- Office supplies, drawings, specifications, journals, samples, prototype models, photographs, or other data
- Compass owned tools or equipment

Your final paycheck will be issued on the next normally scheduled payday, unless other arrangements are made. Participation in any benefit programs will cease, unless the employee is entitled and elects to extend coverage of certain benefits as provided under federal and state law.

2.9 *Exit Interviews*

Exit interviews help us understand employee concerns and improve our business and our workplace. Regardless of the reason for termination of employment, Compass may request that you participate in an exit interview.

If Compass requests an exit interview, you likely will be contacted by telephone by the HR Manager. If we have not requested an exit interview and you wish to schedule one, please contact either the HR Manager or your supervisor.

2.10 *Performance Reviews*

Compass's goal is to provide performance reviews, typically provided on an annual basis, but they are also part of the ongoing process of continuous evaluation of an employee's work in relation to responsibilities and objectives established for one's position. The purpose of reviews is to have a candid and open dialog regarding an employees' performance and personal / professional goals and talk over ways in which these can be aligned with the objectives of Compass. If more than a year has passed since your last review, please contact Human Resources to schedule an appointment.

If you are interested in an update on your performance, you are encouraged to ask your supervisor for feedback at any time.

A performance review does not imply there will be an adjustment to your salary or wage.

2.11 Salary and Wage Reviews

Your salary or wage will be reviewed usually after an assigned project is completed or annually for office / administrative staff. This does not guarantee an increase. Salary and wage increases are at the discretion of Compass and may be based on a number of factors including, but not limited to, Compass's business and profitability, market factors, your performance, and your work group's performance.

2.12 Personnel Files

We maintain a personnel file for each employee. Keeping your records up-to-date can be important to you with regard to pay, deductions, benefits, promotions, transfers, layoffs & recalls and other matters. If you have a change in any personal information, please notify Human Resources as soon as possible. You may contact Human Resources (hr@compass-gc.com) at any time for a listing of the personal information most pertinent to your employment here at Compass.

Additionally, at your request, we will give you a reasonable opportunity to inspect your file. If you disagree with anything in your file, you may add a statement of disagreement to the file. If you wish to review your file, contact the HR Manager to schedule an appointment. The HR Manager or another Compass representative will be present when you review your file.

Compass does not release personal information without authorization from the employee or as may be required by law.

Personnel files are Compass property.

2.13 Health and Safety

Safety is everyone's responsibility. Compass strives to provide a safe and healthy work environment for all employees, clients, visitors, and residents to our offices and sites. We will make every effort to comply with relevant state and federal occupational health and safety regulations and laws and expect that every employee will promptly report hazardous or unsafe situations and work-related accidents, injuries, or illnesses to your supervisor.

Site Specific Safety Plans, Accident Prevention Programs and Chemical Hazard Communication Programs have been prepared and are available at every site office. You may review these documents by contacting the Safety Committee Chairperson or your supervisor.

2.14 Job Opportunities

We encourage the promotion of our current employees. However, in some cases, we may decide it is in Compass's best interest to recruit from outside of Compass.

If you are interested in growing within the Company you are encouraged to speak up and contact the supervisor in charge of that position. In general, to qualify for any job opening you must have the requisite experience, a satisfactory performance record and no disciplinary actions since your last performance appraisal.

2.15 Employee Referrals

Compass encourages you to recommend suitable candidates for employment consideration and may, from time to time, offer bonus incentives for the successful referral of new employees. During the times when such incentives are being offered, if you recommend a candidate who is then hired and completes the probationary requirements, you will receive a bonus payment (less applicable taxes). A successful referral must meet the following criteria –

- The candidate must accept a full time position & subsequently complete his/her six-month probationary period
- Upon completion of the probationary period, the candidate and you must also still be employed by Compass

To recommend someone for hiring consideration, contact careers@compass-gc.com (or your supervisor for hourly staff referrals (carpenters / laborers)).

2.16 Employment of Relatives

Compass will not employ relatives of other employees, except under the following circumstances:

- Neither employee will supervise, or have the authority to appoint, remove, or discipline the other;
- Neither employee will evaluate or audit the work of the other;
- The working relationship will not create an actual, or reasonably foreseeable, conflict of interest between Compass's interest and his or her own interest, as determined in the sole discretion of management; and,
- The working relationship will not create the reality or appearance of improper influence or favor and neither employee is a policy level officer of a customer, competitor, regulatory agency, or other party with whom Compass deals.

For purposes of the policy, the term "relatives" includes spouses, domestic partners, siblings, parents, children, grandparents, nieces, nephews, and others in a like relationship to the employee.

If two employees develop a close relationship or marry each other after being employed by Compass and the criteria set out above is not satisfied, one of the two may be transferred if a suitable position is available. If no suitable position is available, one of the two will be terminated. The decision as to which employee will be terminated will be left to the employees involved unless the parties refuse to decide or business necessity requires Compass to make the decision.

Section 3 - Pay Practices

3.1 **Overtime**

For payroll purposes, the workweek is Monday through Sunday and consists of 40 hours. Due to the nature of our business, you may be required to periodically work extra hours. If your position is non-exempt (eligible for overtime compensation), you will receive one and one-half (1½) times your regular rate of pay for every hour worked in excess of 40 hours in the workweek, or as required by applicable state law. Holidays, sick leave, and vacation leave are not considered time actually worked when calculating hours worked for overtime purposes.

To work overtime on Compass premises or to take work home, non-exempt employees must obtain approval, in advance, from the supervisor.

3.2 **Payroll**

Employees are paid every two weeks on Friday via direct deposit. Your paycheck includes the two-week pay period that ends the preceding Sunday.

With each paycheck, you are able to access an electronic statement showing gross pay, deductions, and net pay. All required (federal / state taxes, garnishments, etc.) and optional (401k, etc.) deductions shall be reviewed with you during your employment orientation. Contact Payroll at payroll@compass-gc.com if you have any questions about your paycheck.

We do not allow payroll draws.

3.3 **Time and Attendance Records**

You are responsible for ensuring that your attendance and all of your hours worked are recorded accurately. Altering or falsifying your time or attendance records, or completing another employee's time and attendance record, is prohibited and may result in disciplinary action, up to and including termination.

Time and attendance records are Compass property and are not to be removed from the premises.

3.4 **Employee Status**

A **regular full-time employee** is one who is regularly scheduled to work 30 hours or more per week.

A **regular part-time employee** is one who is regularly scheduled to work fewer than 30 hours each week.

A **temporary employee** is one who is scheduled to work for a predetermined, limited time period.

You will be informed of your status when you are hired. Status can be changed anytime at management's discretion.

3.5 Exempt / Non-Exempt Definitions

Non-Exempt employees (overtime eligible): The Fair Labor Standards Act (FLSA) is a federal law governing overtime. The FLSA requires that all employees who are not exempt from this law (hourly employees and certain salaried employees) and who work more than 40 hours in a workweek receive overtime pay for hours worked beyond 40. Overtime pay requirements may also vary according to state laws. Please see your supervisor if you have questions about overtime eligibility or if you need assistance calculating your overtime pay.

Exempt employees: Some salaried employees are classified as exempt from the FLSA and applicable state laws and, therefore, are not eligible for paid overtime. Exempt employees' duties are typically of an executive, professional, or administrative nature. In some instances, computer professionals are also exempt.

3.6 You will be informed of your job group and job title when you are hired. Job group and job title can be changed anytime at management's discretion.

Section 4 - Employee Benefits

The benefits currently in place as outlined in this section (Section 4) are subject to change by Compass at its discretion at any time. The descriptions of benefits provided in this Manual are not official summary plan descriptions. For further information about your benefits, contact the Human Resources Manager or the insurance carrier.

Benefit eligibility is determined based on Employee Status, Job Group or Job Title. Regular part-time, temporary, interns and summer employees are not eligible for vacation.

4.1 **Vacation**

Compass provides vacation for its qualified employees to enable them to enjoy a time of rest and relaxation, and to allow time for attending to personal matters. All employees are enthusiastically encouraged to take a vacation each year.

Exempt & Office Non-Exempt (Hourly) Full-Time Employees** will be eligible for vacation that will accrue based upon years of continuous service. However, vacation will never accrue beyond the established maximums, so employees must use it by their anniversary date.

Qualified employees, will accrue vacation each calendar year, based on the following table:

<i>Years of Continuous Service</i>	<i>Annual Vacation (Based on 2080 hours/year)</i>	<i>Vacation Earning Rate (hours/26 pay periods)</i>	<i>Maximum Vacation Carry-over</i>
<i>Less than 5 Years</i>	<i>80 hours</i>	<i>3.08 hours/pay period</i>	<i>40 hours</i>
<i>5 through 9 Years</i>	<i>120 hours</i>	<i>4.62 hours/pay period</i>	<i>60 hours</i>
<i>10 through 14 Years</i>	<i>160 hours</i>	<i>6.15 hours/pay period</i>	<i>80 hours</i>

Non-Exempt(Hourly) Field Labor Full-Time Employees** will be eligible for vacation based upon years of continuous service.

Qualified employees, will accrue vacation each calendar year, based on the following table:

<i>Years of Continuous Service</i>	<i>Annual Vacation (Based on 2080 hours/year)</i>	<i>Vacation Earning Rate (hours/26 pay periods)</i>	<i>Maximum Vacation Carry-over</i>
<i>Less than 3 years</i>	<i>Not Eligible</i>	<i>Not Eligible</i>	<i>Not Eligible</i>
<i>3 through 5 Years</i>	<i>40 hours</i>	<i>1.54 hours/pay period**</i>	<i>20 hours</i>
<i>5 or More Years</i>	<i>80 hours</i>	<i>.0385 hours per hour worked**</i>	<i>40 hours</i>

****For All Non-Exempt Full-Time (Hourly) Employees - Maximum accrual base of 40 hours per week.**

Vacation Policy Guidelines:

A paid holiday that occurs while an employee is using their vacation is counted as a holiday, not a vacation day.

An employee's supervisor must approve specific "Time Off" schedules. Because supervisors are responsible for maintaining adequate staffing levels, they have the authority to limit the approval of Time Off requests to meet operational needs. Requests will normally be granted if the employee's absence will not negatively affect operations. Usually, only one employee may use vacation in a department at any one time. Providing at least with two weeks' notice will allow supervisors to accommodate these requests more readily.

Employees are encouraged to plan their vacations in advance and take their available vacation within the year of their anniversary date. However, if an employee is unable to use all their accrued vacation, they are limited in the number of vacation hours they may only carry over to the following year. Unused hours, more than the carry over maximum, will be forfeited at the beginning of the next anniversary year of employment. Vacation unused or forfeited under the carry-over policy will not be converted to cash.

If you are on an approved leave of absence for less than thirty (30) days, your vacation eligibility will not be affected.

You will not be paid for any unused vacation hours when your employment terminates.

4.2 Holidays

All full-time employees will receive a paid day off for the following holidays:

- January 1 (New Year's Day)
- Last Monday in May (Memorial Day)
- July 4 (Independence Day)
- First Monday in September (Labor Day)
- Fourth Thursday in November (Thanksgiving Day)
- Friday following Thanksgiving Day
- December 24 (Christmas Eve) *
- December 25 (Christmas Day)
- December 31 (New Year's Eve) *

* Holiday is a half day. Eligible employees will be paid for 4 hours this day.

Holidays that fall on a Saturday or Sunday will be observed on the Friday prior or Monday following.

If a holiday occurs:

- During your vacation, you receive holiday pay (hours will not be deducted from your vacation accrual)
- While you are using paid sick time, you receive holiday pay

- While you are on jury duty or in court on Compass business, you receive a compensating day off to be used within the following 12 month period
- During unpaid approved time off, you do not receive pay or additional time off

If you are a regular part-time or temporary employee, you are not eligible for holiday pay.

4.3 Insurance Benefits

If you consistently work 30 hours or more per week, you are eligible to receive medical, dental and vision insurance through Compass after the first 30 days of employment. Unless otherwise informed, coverage will begin on the 1st day of the month following the first 30 days of qualifying employment. If you do not wish to participate in the Compass provided insurance benefits, you must sign a waiver documenting your decision.

Regular part-time employees (who work less than 30 hours a week) and temporary employees are not eligible for insurance coverage.

Compass generally pays the entire premium for regular full-time employee coverage. Any dependent or spouse coverage is optional and is paid by you through payroll deductions.

If you have questions about your medical and dental coverage, please refer to the Summary Plan Description provided by the insurance carrier. If there is any conflict with other oral or written descriptions of these benefits, the descriptions in the plan documents and insurance contracts control.

If you have any additions, deletions, address changes, or other changes to your insurance coverage, notify the HR Manager immediately. The insurance carrier restricts the addition of dependents to the plan and, depending on the circumstances, may limit such additions to the annual open enrollment period.

4.4 Social Security Benefits

The federal government provides Social Security (FICA) and Medicare benefits when you reach retirement age. These programs may also provide disability income for various categories of employed and dependent persons. This program is funded by deductions made from your paycheck and a matching amount that is paid by Compass on your behalf. If you have questions regarding Social Security, contact the Social Security Administration.

4.5 Workers' Compensation Insurance

All employees are covered while on the job by workers' compensation insurance. This insurance may provide coverage for you if you suffer a work-related injury or illness. State law determines an employee's eligibility and the level of payments for medical expenses, lost time, and other benefits. If you experience a work-related injury or illness, report the situation immediately to your supervisor.

4.6 401(k) Retirement Plan & Trust

Compass offers a 401(k) Retirement Plan & Trust salary deferral program to all regular, full-time employees who are age twenty-one (21) or over and have completed at least six (6) months of

employment and the first of the following quarter. The plan allows eligible employees to defer a portion of their pay into the Plan. Employee deferrals are handled via payroll deduction and you may choose to save pre-tax, Roth after-tax or both.

While the amount you defer is up to you (subject to IRS limitations), Compass will match 100% of your contributions to the Plan up to a pre-determined maximum percentage of annual gross earnings (percentage is subject to change, check with Human Resources for current value). The Plan is a 'safe-harbor' plan which means that your contributions, and the Compass 'safe-harbor' match, are always 100% vested. Any Compass discretionary contributions are subject to a 20% per year vesting schedule with full vesting at five (5) years from your date of hire.

Employees are responsible for their 401(k) investments. The Plan provides a broad list of investment options from which to choose, including time & risk tolerance managed portfolios. These options allow you to select investments suited to your unique needs. The Plan intends to comply with IRS Section 404(c), meaning Compass is not responsible for your investment choices or outcomes.

Your account is intended for retirement and, generally, the IRS restricts reasons for withdrawal to retirement, disability, death, or termination from Compass. Alternative reasons for access to funds in the Plan may be available and are subject to IRS regulations. Distributions prior to age 59-1/2 may be subject to early withdrawal penalties.

Participation in the 401(k) plan is voluntary. For more information, please contact Human Resources or the Plan advisor to see the Plan documents. The terms & conditions outlined in the Plan documents will govern if there are any conflicts with other oral or written information.

4.7 Cell Phone Allowance

Compass does not issue cell phones to its employees. If Compass deems that a cell phone is required for your job, Compass will add a flat cell phone taxable allowance to your paycheck each pay period. Rates are subject to change. If you have any questions regarding this policy, please contact Human Resources.

Compass would like to remind all employees that cellular phone use can be distracting and should not be done while driving, operating equipment, or doing other tasks that requires concentration. Job sites are busy places and distractions such as cellular phones can lead to injuries to yourself and others.

Employees are further encouraged to practice good verbal & written etiquette in a succinct, professional manner (phone calls, emails, texts, etc.). Limiting smart phone usage during meetings is also strongly encouraged.

4.8 Education and Course Reimbursement

Compass supports employees who wish to continue their education to secure increased responsibility and growth within their professional careers at Compass. In keeping with this philosophy, Compass has established a reimbursement program for expenses incurred through

approved institutions of learning. If you are a regular, full-time employee, have completed at least 6 months of employment, and received Executive and Supervisory approval, you are eligible for participation in this program as long as the courses are job-related. Please contact Human Resources (hr@compass-gc.com) for the most current reimbursement guidelines and opportunities.

4.9 Expense Reimbursement

From time to time, an occasion will arise when an employee will need to use personal funds for business purposes or use their personal vehicle for Compass business (not including travel to and from work). Reimbursement for significant purchases should have prior approval from management. Reimbursements for such expenses will be made upon submittal and approval of an Expense Reimbursement Form with receipts attached and will be paid on regularly scheduled check runs. All reimbursements must be approved by Accounting and must be submitted within 30 days after the expense incurred or the expense(s) will not be reimbursed.

You must also have auto insurance and a valid driver's license to drive on Company business. Company business includes even quick trips to the office supply store. Do not drive on Company business if you do not have insurance or a valid driver's license.

Minimum coverage should be as follows (per WA State RCW requirements) –

- \$ 25,000 per person bodily injury liability
- \$ 10,000 property damage liability

Compass also recommends that you have the following coverages, but they are not required –

- Personal Injury Protection
- Uninsured / Underinsured Motorist Coverage
- Collision
- Comprehensive
- OR a Combined Single Limit policy that combines much of the above into a single value limit

Please check your policy to ensure you have this basic coverage.

Section 5 - Absence from Work

5.1 *Attendance and Punctuality*

You are expected to report to work on time and when scheduled. If you will be delayed more than a few minutes or are unable to report to work, you should promptly call your supervisor to explain the circumstances. Unless your supervisor has agreed to some other schedule, you must call in at the beginning of each scheduled workday if you will be absent. Tardiness or poor attendance may lead to disciplinary action, up to and including termination of employment.

No show/no call situations will always result in disciplinary action up to, and including termination, of employment. Absences from work for 3 or more consecutive days without proper notification may be treated as a voluntary resignation.

5.2 *Sick Leave*

Compass exempt employees shall accrue paid sick / safe leave at a rate of 2.15 hours per pay period, non-exempt (hourly) employees shall accrue paid sick / safe leave at 1 hour for every 40 hours worked. Accrued sick / safe leave may be carried over to the following year to a maximum of:

- 56 hours (for field non-exempt employees)
- 120 hours (for office/management exempt & non-exempt employees)

Sick leave is only to be used for the following reasons:

- Your own illness or injury;
- Illness or injury to your spouse or children;
- Death in your family;
- Birth of a child to you or your spouse; or
- Religious observance required by your religion.

Safe leave is to be used:

- For unforeseen childcare issues such as a school or child care center closure.
- To tend to legal issues related to domestic violence, sexual assault, or stalking.

Sick leave may be used to care for your own illness or injury, your child who has a health condition that requires treatment or supervision, or your spouse, parent, parent-in-law, or grandparent who has a serious health condition or an emergency condition.

Compass reserves the right to require a doctor's verification from employees who are absent from work for more than 3 days because of injury or illness or sickness of a family member.

Whenever possible, your supervisor must approve sick leave in advance. If you are not able to provide advance notice, you must notify your supervisor of your absence as soon as possible.

Sick leave is intended to provide security to you and your family in the event illness or injury prevents you from working or for the reasons set out above. It is not intended to be an

additional entitlement of time off. Sick and safe leave cannot be converted to cash or be used as vacation or holiday time.

You will not be paid for any unused sick leave when your employment terminates.

5.3 *Jury Duty and Subpoena as a Witness*

Employees called to serve on jury duty will be approved for un-paid leave for the time required to be away from work due to jury service. You may use available vacation time during jury service. You may also keep the allowance you receive from the court for your service.

If you are subpoenaed to appear in court as a witness, you will be given unpaid time off to appear unless you are called on behalf of Compass as a witness. If Compass calls you as a witness, the time spent testifying will be paid.

If you are summoned for jury duty or are subpoenaed to appear as a witness, present a copy of the summons or subpoena to your supervisor as soon as possible.

You must report to work during your regular hours if you are not required to remain at court (i.e. you are on call but have not been selected to sit on a jury panel).

5.4 *Other Leaves of Absence*

A. *Pregnancy or Childbirth-Related Disability Leave*

If you are sick or temporarily disabled because of pregnancy or childbirth, you will be given an unpaid leave of absence for the period of time during which you are actually disabled. Compass may require that a licensed health care provider certify the actual period of disability.

Additional leave time may be available under state or federal family and medical leave provisions. Leaves are complex; some run concurrently, while others do not. Please contact HR to discuss available time off for your pregnancy.

Compass will continue your group medical insurance while you are on a disability leave of absence until the first of the month following 90 days from the start of the leave, unless your leave qualifies under FMLA as described below. After that time, you may continue your health insurance through the COBRA continuation program, if eligible, at your own expense. You will receive more information regarding COBRA when it is applicable to you. Contact Human Resources for more information about COBRA.

B. *Family and Medical Leave Act – “FMLA” Leave (50+ Employees)*

Basic Leave Information

If you work at a location where 50 or more Compass employees work within a 75-mile radius, have been employed by Compass for at least one year, and have worked at least 1,250 hours during the 12 months prior to the commencement of your leave, you may

take up to 12 weeks of job-protected unpaid leave during a 12-month period (as defined later in this policy) for one or more of the following reasons:

- for incapacity due to pregnancy, prenatal medical care or child birth;
- to care for your child after birth, or placement for adoption or foster care;
- to care for your spouse, son, daughter or parent, who has a serious health condition; or
- for your own serious health condition that makes you unable to perform your job.

Military Family Leave Information

If you are eligible for FMLA leave and your spouse, son, daughter or parent is on covered active duty or called to covered active duty status, you may use the 12 weeks of leave to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is: (1) a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness; or (2) a veteran who was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.

Benefits and Protections

During FMLA leave, we maintain your health coverage under the group health plan at the same level and under the same conditions as if you had continued to work. You are responsible for continuing to pay the employee share of the premium. If you do not return to work after the conclusion of the leave, you may be responsible for reimbursing Compass for any premiums paid during the leave period. Under most circumstances, upon return from FMLA leave, employees are restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms. Use of FMLA leave will not result in the loss of employment benefits that accrued prior to the start of the leave.

Definition of Serious Health Condition

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

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

Use of Leave

Employees do not need to use FMLA all at once. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. You must, however, make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt Compass operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

If Compass employs both you and your spouse, you are together entitled to a total of 12 workweeks in 12 months for any leave taken for the birth, adoption, or placement of a child, or to care for a parent with a serious health condition. Similarly, you are together entitled to a total of 26 workweeks during the single 12-month period mentioned above for any leave taken to care for a covered service member.

FMLA Leave for birth, adoption, or foster care placement must be completed within 12 months of the date of the birth or placement.

The 12-month period, for purposes of this policy, varies from individual to individual, begins on the date that you first take an FMLA-eligible leave, and continues for 12 months from that date.

Substitution of Paid Leave for Unpaid Leave

Generally, you are required to use any available paid vacation/sick leave as part of FMLA. You will be asked to comply with our normal paid leave policies for the purpose of this paid substitution.

Employee Responsibilities

If the leave is foreseeable, you must advise your manager, in writing, at least 30 days in advance of the anticipated starting date of the leave. When 30 days' notice is not possible, you must provide notice as soon as practicable and generally must comply with all our normal call-in procedures.

You must provide sufficient information for Compass to determine if the leave may qualify for FMLA protection and provide the anticipated timing and duration of the leave. This information may include that you are unable to perform job functions; your family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. You must also inform us if the requested leave is for a reason for which FMLA leave was previously taken or certified. You will likely be required to provide a certification and periodic recertification supporting the need for leave and,

depending on the circumstances of your leave, a fitness for duty certification when you wish to return to work.

Our Responsibilities

When you request leave, we tell you whether you are eligible under FMLA. If you are, we specify any additional information required as well as your rights and responsibilities. If you are not eligible, we provide a reason for the ineligibility. We also let you know if your leave will be designated as FMLA-protected and the amount of leave that will be counted against your leave entitlement. If we determine that the leave is not FMLA-protected, we will notify you.

Employers may not interfere with, restrain, or deny the exercise of any right provided under FMLA; or discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA. An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer. FMLA does not affect any federal or state law prohibiting discrimination, or supersede any state or local law or collective bargaining agreement, which provides greater family or medical leave rights.

C. *Washington Family Leave for Registered Domestic Partners*

If you are a Washington employee who works at a location where 50 or more Compass employees work within a 75-mile radius, have been employed by Compass for at least one year, and have worked at least 1,250 hours during the 12 months prior to the commencement of your leave, you may be eligible to take up to 12 workweeks of unpaid leave during a 12-month period to care for your state registered domestic partner. This leave is handled in a manner substantially similar to FMLA. However, please note that during Washington Family Leave, Compass does maintain coverage under the group health plan at the same level and under the same conditions as if you had continued in employment.

D. *Military Leave*

Military Leaves are available to employees in accordance with applicable federal and state laws. Please contact your supervisor or the Human Resources Department to inquire about or arrange for any eligible Military Leaves.

E. *Family Military Leave*

If you work at least 20 hours per week and your spouse is called into active duty for the Armed Forces or will be, or is, deployed during a period of military conflict, you may be eligible to take up to 15 days of unpaid leave. This leave is available before the deployment or when your spouse is on leave from the deployment, and is available for each new deployment.

If you wish to take advantage of this leave of absence, let us know within five business days after you receive the official call or order to active duty or of your spouse's leave from his or her deployment.

If you wish to take advantage of this leave of absence, let us know within two business days after you receive the official notice of your spouse's leave from his or her deployment and provide documentation showing that your spouse will be on leave from deployment.

F. *Personal Leave*

Compass may grant a personal, unpaid leave of absence when an extended period away from the job is in the best interests of you and Compass. The grant or denial of personal leave is at the sole discretion of Compass.

Compass will continue group medical insurance while you are on a personal leave of absence until the first of the month following 90 days after the start of the leave. After that time, you may be allowed to continue your health insurance through the COBRA continuation program at your own expense. You will receive more information regarding COBRA when it is applicable to you.

G. *Bereavement Leave*

All full-time Employees suffering the misfortune of a death of an immediate family member (as defined below) may be granted up to three (3) work days (24 hours) off with pay, per occurrence, to attend the funeral or its arrangements.

You must notify your supervisor immediately if you need to take bereavement leave. Upon Supervisor and Human Resources approval, you may use sick time or vacation or for absences beyond your three (3) work days of bereavement time. Otherwise, additional time off will be unpaid.

"Immediate family member" is defined as:

- Spouse, domestic partner and parents thereof;
- Children, including spouse or domestic partner's children, step and foster children;
- Parents, step parents and siblings;
- Grandparents, grandchildren; and
- Mother-, father-, sister-, brother-, son- or daughter-in-law
- Aunt, uncle, niece or nephew

H. *Domestic Violence/Sexual Assault Leave*

Compass grants leaves of absence to employees who a) are victims of domestic violence, sexual assault, or stalking; or b) have a family member who is a victim of these crimes. In general, this time away from work is available so you can take care of legal, medical, or safety issues related to these situations. Please contact your supervisor or the Human Resources Department to inquire about or arrange for this type of leave. We may require verification to support the need for the leave, and employees must give us notice of the need for this leave no later than the end of the first day the employee takes the leave, or as required by state law.

I. Application Procedures and Special Conditions Relating To Leaves of Absence

Ordinarily, requests for a leave of absence or for an extension of a leave must be submitted to your supervisor at least one month prior to the requested commencement of the leave period or extension. Your supervisor will notify you as soon as possible whether your request has been approved. You should not assume that you are on an approved leave of absence until you have been officially notified of that fact.

All leaves of absence are subject to the following conditions:

- If you apply for or engage in any work for compensation while on a leave of absence, you may be subject to immediate termination unless Compass has consented to the arrangement in advance and in writing.
- If you improperly apply for unemployment benefits while on a leave of absence, you may be subject to immediate termination.
- If you engage in any conduct or activity that violates restrictions imposed by a physician or that might otherwise delay your full return to regular employment, you will be subject to disciplinary action, up to and including termination of employment.
- When requesting a leave, try to estimate the amount of time required for the leave. If the reason for the leave ceases to exist prior to the estimated expiration date, you must immediately inform your supervisor.

Compass may initiate a leave of absence if it concludes that attendance, quality or quantity of work, safety, or efficiency have been adversely affected by personal circumstances or that a leave of absence would be in the best interests of you and Compass.

If you fail to return to work at the conclusion of your leave of absence without properly notifying Compass, your employment may be terminated. The effective date of your termination will be the last day worked. The termination will be treated as a voluntary quit. If Compass offers COBRA, for COBRA purposes the date group coverage terminated will be the date of the qualifying event.

Compass will comply with all applicable state and federal laws in making any determination relating to a leave of absence and all leaves of absence are subject to those state and federal laws. If you have questions about leaves of absence, talk to your supervisor.

Section 6 - Personal Conduct

6.1 *Employee Behavior*

Certain standards are necessary for the efficient operation of Compass and for the benefit and protection of the rights and safety of all Compass employees. Conduct that interferes with the operations, brings discredit to Compass, or is offensive to customers or fellow employees will not be tolerated whether it occurs on or off Compass time or Compass property. If you have questions about this policy, you should talk to your immediate supervisor.

All employees are expected to conduct themselves professionally and behave in a manner that is conducive to the efficient operation of Compass.

6.2 *Disciplinary Action*

It is essential that all employees accept personal responsibility for maintaining high standards of conduct and job performance. While many factors are taken into consideration if it becomes necessary to discipline an employee, including the nature and seriousness of the problem, the employee's past work record, and the total impact on the department and office, if your performance or behavior is not meeting our expectations, Compass may use one or a number of steps to address the issues.

Discipline may include, but is not limited to –

- Counseling and/or verbal warnings
- Written warnings
- Final written warnings
- Termination of employment

In most cases, when a problem comes to the attention of your supervisor, the two of you will discuss the issue and decide how to improve the situation. In some cases, your supervisor may simply direct you in a course of action. Regardless, you will be expected to follow through on the course of action that emerges from that discussion.

The purpose of disciplinary measures, short of discharge, is to encourage employees to improve their conduct or performance. Even if corrective action is implemented, termination may occur. In all cases, Compass, in its' sole discretion, may warn, reassign, suspend, or discharge any employee at will and at any time.

In the event of a serious offense that warrants immediate discharge, the intermediate disciplinary measures noted above would not apply.

6.3 *Personal Appearance*

Your clothing and grooming should be appropriate to the workplace. In some cases, health and safety standards may require special clothing, shoes, or hairstyles. On jobsites, appropriate attire includes proper footwear, use of hard hats and other required safety gear.

Please be advised that the corporate office also has a dress code. If you are required to work in the corporate office for any reason, you will be required to adhere to the following:

Unless meetings or appointments require 'traditional business' attire, employees in the Compass corporate office may be flexible in their choice of office attire within the generally accepted definitions of 'business casual' (clean / un-ripped jeans may also be worn). The intent of this policy is for employees to be comfortable while still appearing professional, clean, and neatly groomed.

If you have any questions, please consult your supervisor or the HR Manager (hr@compass-gc.com). In all cases, you are expected to comply with Compass's requirements.

6.4 *Personal Telephone Calls and Mail*

Personal telephone calls or text messages should only be made when necessary and should be as brief as possible. Unless it is an emergency, calls should only be made during scheduled breaks. Telephone conversations conducted on Compass premises may be monitored from time to time by Compass.

Compass's address should not be used to receive personal mail. All communications, including but not limited to letters, memos, voicemail, and electronic mail is subject to review and inspection by Compass. In no case should you use Compass stationery or other supplies for personal use.

6.5 *Personal Property*

Compass will not assume any responsibility for loss, theft, or damage to personal property, including vehicles, brought to work.

Compass retains the right to inspect all documents, envelopes, packages, etc. brought into or taken off the premises.

6.6 *Company Property*

Your desk, office, equipment, workstation, files, computer files, locker, and other tools of the trade are Compass property, and we reserve the right to inspect, with or without advance notice, all such property. You may not put your own lock on Compass property.

6.7 *Intellectual Property*

All inventions and creative output developed using Compass time, Compass equipment, supplies, facilities, or trade secrets, or that relate directly to our business or anticipated business (such as estimating / budgeting and/or subcontractor info) are Compass property.

Inventions and creative output developed outside of Compass time while not using any Compass equipment, supplies, facilities, or trade secrets and which are not related to our business or anticipated business, are not Compass property.

6.8 Solicitation

We desire to conduct our operations in an orderly and efficient manner. We believe our employees and customers should have the opportunity to work without interference from persons who are pursuing a purpose not related to our normal business. With this in mind, we have established the following rules:

Except for bona fide Compass purposes, non-employees are prohibited from coming on Compass premises to solicit, survey, or petition employees or customers or to distribute literature or other materials for any purpose at any time. This policy includes charity solicitors, salespersons, union organizers, and any other person with any other form of solicitation or distribution. Furthermore, employees are prohibited from distributing any form of literature or other material during working time or in their work areas that is not related to Compass's business purpose and authorized by management. Employees are also prohibited from soliciting other employees for any cause during their assigned working time. For this purpose, "working time," means time when either the soliciting employees or the employees who are the object of the solicitation are expected to be actively engaged in their assigned work.

6.9 Confidential Company Information

Compass maintains and fosters the highest ethical standards in dealing with its employees, clients, subcontractors / suppliers, tenants and the general public. Our customers and subcontractors / suppliers entrust Compass with important information relating to their businesses. The nature of this relationship requires the maintenance of confidentiality. In safeguarding the information received, Compass earns the respect and further trust of our customers and subcontractors / vendors. The intentional, or unintentional, discussion of confidential, or non-public, information may be harmful to Compass, its employees, or both. Any violations of confidentiality could seriously injure Compass's reputation and effectiveness.

In the course of performing your job, you may be exposed to confidential information. Confidential information includes, but is not limited to, information about Compass's customers, pricing, forms, marketing and business strategies, finances, personnel, and any other information that is not readily accessible to the public. Confidential information must not be used, discussed, or disclosed to anyone outside Compass and should be disclosed within Compass only when necessary. If you work in sensitive areas, additional restrictions may be imposed.

6.10 Computer Software and Unauthorized Copying

Compass prohibits the illegal duplication of software. Copyright laws are clear on this point. Under federal law, the copyright holder is given certain exclusive rights, including the right to make and distribute copies. It is illegal to make or distribute copies of copyrighted material without authorization from the copyright holder or its licensee unless the copy is made for backup or archival purposes.

Compass licenses the use of computer software from a variety of outside companies. Compass does not own this software and therefore does not have the right to reproduce it without the permission of the copyright holder. If you become aware of any unauthorized distribution or

copying of software or related documentation within Compass, notify your supervisor or manager immediately.

Any employee engaging in the illegal reproduction of software may be subject to civil damages and criminal penalties, including fines and imprisonment. Employees who make, acquire, or use unauthorized copies of computer software may also be subject to disciplinary action, up to and including termination.

6.11 *Electronic Mail and Internet Usage*

The email system and access to the Internet are property of Compass that may be available for your use, so long as your use does not interfere with your job performance, the job performance of any other user, or violate any policy, guideline, or standard of Compass. Compass may, in its sole discretion, determine how and when the email system and the Internet will be used and for what purposes.

You should honor the password and other security provisions of the email system. You must not use codes or passwords to gain unauthorized access to other employees' files or to Compass files. You should not provide access to Compass's email system or any other portion of the computer network to anyone other than employees of Compass and other authorized users.

Use your good judgment when using the email system or when accessing the Internet. Despite the password and other security provisions, the email system is not confidential or private. Do not transmit or download vulgar or sexually explicit messages or images, or jokes or comments that are inconsistent with Compass's policies, such as those policies prohibiting discrimination and harassment. For example, avoid jokes or comments aimed at a particular gender, race, religion, disability, sexual orientation, political ideology, etc. You may not use Compass access to the Internet to access offensive or inappropriate sites, such as sites displaying pornographic or sexually graphic images. Misuse of the email system or Internet access could lead to disciplinary action, up to and including termination.

All records and messages on Compass's computer systems, including email, are records and property of Compass in accordance with its current policy. Compass reserves the right to access, monitor, read, disclose, use, and otherwise deal with any records and messages on its systems in any manner that it chooses. Copies of every email and website are stored by Compass before they are displayed on your computer. Therefore, deleting them will not eliminate the information, nor prevent Compass from retrieving it if it chooses to for business or legal reasons. Consequently, you should not use the systems for any information you want to keep personal or private.

6.12 *Use of Cellular Phones while Driving*

Compass is committed to promoting driving safety and encourages the safe use of cellular telephones by its employees while on Compass business. While Compass recognizes that employees may feel there is a business need to use cellular phones, safety is the first priority.

If you need to make a telephone call while driving, you should find a proper parking space first. Compass discourages employees from stopping on the side of the road except for emergencies such as a car accident or a breakdown.

Safe cellular phone use is only one part of safe driving. You should also remember that while traveling on business, you are expected to conduct yourself in a safe and legal manner.

6.13 *Outside Employment and Conflict of Interest*

If you are working full-time, outside employment should be viewed as secondary to your primary job at Compass. Outside employment or second jobs that may create a conflict of interest must be approved, in advance, by your supervisor, if your duties and job performance to Compass are not impacted in any way. Any activities related to outside employment (e.g., mail, telephone calls) must be conducted offsite and not during scheduled work hours.

Conflicts of interest, whether deliberate or accidental, undermine the public's trust in Compass and must be avoided. A conflict of interest exists in any situation in which an employee's interests may conflict with that of Compass.

In evaluating the possibility of a conflict of interest, one must consider one's own conscience and the expectations of a detached observer. The appearance of a conflict of interest can be just as damaging as an actual conflict. Employees must avoid all situations that either give rise to a conflict of interest or have an appearance of a conflict of interest.

6.14 *No Smoking*

Smoking is prohibited in Compass's building(s). Smoking is only allowed in designated areas outside Compass's building(s). Specifically, smoking on jobsites is not allowed in the building or jobsite offices or storage areas for the duration of construction. If you use the designated smoking area, you are responsible for ensuring that the area is kept neat and that all associated trash (e.g., butts, ash, wrappers) are disposed of properly.

6.15 *Drug- and Alcohol-Free Workplace*

Compass is committed to maintaining a drug- and alcohol-free workplace to protect against the serious risks posed by the manufacture, distribution, possession, or use of alcohol or controlled substances. Such activity threatens and impairs employee health, safety, security, morale, and job performance. Compass will take all reasonable steps to prevent and eliminate the unauthorized use of drugs and alcohol in the workplace.

All employees are prohibited from manufacturing, distributing, dispensing, possessing, or using alcohol or any controlled substance in any Compass workplace, while conducting Compass business (including business travel), or during work hours. Employees are further prohibited from reporting to work under the influence of alcohol or other controlled substances. Employees who are taking prescription drugs that may affect their ability to work safely should notify their supervisor or Human Resources of the possible side effects and obtain permission before beginning work. In such situations, we may require information from the treating physician about whether the employee is able to perform his or her job duties.

The appropriate consumption of alcoholic beverages at Compass sponsored functions shall be the responsibility of each individual employee. Any employee who engages in abusive or inappropriate use of alcohol at such events may be subject to disciplinary action up to, and including, termination of employment. As part of Compass's commitment to the safety and well-being of its employees, Compass will pay for transportation between an employee's home and the location of the function.

The Drug-Free Workplace Act requires you to notify Compass if you are convicted of a criminal drug statute violation occurring in the workplace no later than five days after such conviction. Within 30 days of such notice, or from the date Compass receives actual notice of the conviction, Compass will take appropriate disciplinary action.

Disciplinary action, up to and including termination, will be taken against any employee who violates this policy. Compass will deal with each violation in accordance with its current policies and practices and the specific circumstances involved. This may include requiring an employee to satisfactorily complete an approved drug abuse assistance or rehabilitation program or to submit to drug or alcohol testing as a condition of continued employment.

This policy and its distribution are part of our alcohol and drug-free awareness program. The purpose of our awareness program is to inform employees about the dangers of alcohol and drug use in the workplace and to encourage employees who feel they may have developed an addiction to, or dependency on, drugs or alcohol to seek appropriate help and counseling.

Compass will provide further information on this subject from time to time. You are encouraged to contact your supervisor if you have questions about this policy.

6.16 Drug Testing

If an employee causes damage or is involved in a serious accident or near serious accident, sustains a serious injury or near serious injury, contributes to any accident or injury, or if facts, circumstances, physical evidence, physical symptoms, or a pattern of performance or behavior cause an employee or supervisor to suspect that another employee has used or is under the influence of alcohol, drugs, or a controlled substance, you should immediately contact your supervisor. If Compass determines there is reasonable cause to believe that the employee has used or is under the influence of alcohol, drugs, or a controlled substance, the employee will be asked to go to the designated collection facility for testing.

A serious accident occurs whenever there is a serious injury, damage to Compass property or that of a third party. A serious injury occurs any time an employee receives medical attention for an injury requiring treatment beyond simple first aid (e.g. Band-Aid). Employees are required to report all accidents immediately to a manager. Failure to report an accident may result in discipline, up to and including termination.

If an employee tests positive for alcohol or illegal drugs, he or she will be subject to discipline, up to and including termination. The level of disciplinary action taken is dependent on the seriousness of circumstances and other factors involved with the individual case. Suspension

and probationary actions may require employees to enroll in, and complete, a Compass approved counseling or rehabilitation program. Probationary and reinstated employees may be subject to more frequent testing during their time of probation. A second test failure will result in immediate termination of employment.

Any employee who refuses to go to the collection facility, refuses to provide samples for testing, or who tampers with or attempts to tamper with a sample will be presumed to be under the influence of alcohol or illegal drugs and will be disciplined, up to and including termination.

Employees may be placed on suspension pending the test results. Suspension may be unpaid if test results are positive. Suspension may be paid if test results are negative.

6.17 Preventing Violence in the Workplace

We are committed to providing employees with a safe work environment. Therefore, we strictly prohibit threatened or actual violence by our employees on our premises or on a work site.

Violence in the workplace may be described as verbal or physical threats, intimidation, and/or aggressive physical contact. Prohibited conduct includes, but is not limited, to the following:

- Inflicting or threatening injury or damage to another person's life, health, well-being, family or property;
- Possessing a firearm, explosive or other dangerous weapon on Compass premises or using an object as a weapon;
- Abusing or damaging Compass or employee property;
- Using obscene or abusive language or gestures in a threatening manner; or,
- Raising voices in a threatening manner.

Because of the potential for misunderstanding, Compass also prohibits joking about any of the above conduct.

You are encouraged to be proactive in maintaining a safe working environment by reporting violent or potentially violent behavior. If you observe or experience these types of behavior, please report them immediately to your supervisor, manager, the Safety Committee Chairperson, or call emergency 911, when appropriate. In addition, employees working at a remote location or in a client's workplace who experience actual or threatened violent behavior should report it immediately to the appropriate authorities.

Any employee who exhibits violence in the workplace may be disciplined, up to and including termination. Compass may also choose to bring formal charges against anyone who endangers its employees.

Section 7 - Miscellaneous

7.1 *Crisis Management & Media Inquiries*

In the event of a crisis situation, immediately refer to Crisis Management procedures included in all Site Specific Safety Plans maintained at each project site office. Any media inquiries regarding a crisis situation are to be directed to the President. Under no circumstances are any employees to give comments or statements to any media representative. Requests for comments are to be answered with a referral to the President (instead of just saying 'no comment'). If you are contacted by any member of the media, you are to notify the President immediately.

7.2 *Inclement Weather & Natural Disasters*

Compass officers or directors have the authority to close Compass facilities. If there is a question about whether the facility will remain open, you should call the office in advance of your starting time. If the office is closed, an 'All Staff' email will be sent informing you of the closure and any other necessary information.

If you are reluctant to drive in threatening weather or during a natural disaster, you are encouraged to carpool with others whose vehicles might be better equipped to handle the conditions, or to use public transportation. You are encouraged to make every effort to arrive at work, on time, whenever the facility is open.

If the office is open but you are unable to come to work, or you must leave early due to inclement weather or a natural disaster, or the office closes due to inclement weather or a natural disaster, you may either use vacation or take the time off as unpaid.

7.3 *Complaint Procedures*

We know the importance of an open and fair method of resolving complaints and answering questions. Therefore, our complaint resolution procedure makes three steps available to you if you have a question or concern. We encourage you to bring to the attention of management any complaints you may have about work-related situations.

Step 1: We encourage you to bring up any questions or concerns you have about the terms or conditions of employment. Usually, the place to start in answering a question or resolving a concern is with your supervisor. He or she is expected to listen to your question or concern and get back to you with an answer or response, usually within 3 days of your initial discussion.

Step 2: We recognize that in some cases a question or concern you have may involve your supervisor, and you may be reluctant to discuss the situation with that person. If this is the case, or if you are not satisfied with your supervisor's response to Step 1, you may contact Human Resources or another member of management, whose responsibility it will be to investigate your question or concern, discuss it with you, and get back to you. If you are carrying forward an issue first presented by you to your supervisor, we ask that you take your second step, contacting Human Resources or another member of management, within seven days of when you receive your supervisor's response.

Step 3: If you have taken Step 2 and are still not satisfied with the response you have received, you may address a written complaint to the President within seven days of receiving the response under Step 2. The President, or his or her designee, will investigate, review, and discuss your concerns with you as soon as possible and will give you a response within 14 days. This response will be the final decision and resolution of the concern or matter you raise.

We recognize that not everyone is comfortable presenting a grievance to his or her employer, but we encourage our employees to take advantage of our complaint resolution procedure, and we are committed to preventing any retaliation against persons who do so. Taking the time to ask and answer questions, and state and resolve workplace concerns, makes an important contribution to the overall performance and growth of our organization.

7.4 *Innovative Solutions*

We believe the person doing a job is in the best position to think of more efficient and effective methods of performing that job. If you think of a better way of doing your job, or any other job, we encourage you to discuss your idea with your supervisor or manager.

7.5 *Continuity of Policies & Policy Updates*

While Compass will strive to provide notification to employees of changes and updates in policy whenever possible, to preserve the ability to meet Company needs under ever changing conditions, Compass reserves the right, subject to limitations and provisions of applicable laws and regulations, to interpret, modify, augment, delete or revoke any and all policies, procedures, practices, benefits and statements contained in this Manual at its' sole discretion and at any time without prior notice. Such changes shall be effective immediately upon approval by management unless otherwise stated. Policies to be enforced will be from the most current version of the employee Manual.

We hope this Manual has answered your questions. We are glad you have joined Compass, and we welcome your contribution.

