



RISK MANAGEMENT

Protecting And Improving Your Bottom Line

EMPLOYEE HANDBOOK

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1 WELCOME TO EAST COAST RISK MANAGEMENT

This handbook has been developed to familiarize our employees with the company, with key policies and procedures, and with benefits. This handbook supersedes all previous employee handbooks and memos. It applies to all employees of East Coast Risk Management, LLC, East Coast Risk Management of North Carolina, LLC and East Coast Risk Management of Ohio, LLC (collectively referred to as "ECRM" or "the Company.")

1.1 Team Commitments

The company is committed to providing the best full-service risk management services to our clients. In order for us to achieve this goal, all employees and members of management at ECRM must hold themselves accountable to the Team Commitments:

ECRM Team Commitments	
<p>Foster Relationships. Our company is built on strong relationships which require absolute trust, a shared direction, open communication and deep commitment. Instill trust and confidence in those you work with and for.</p>	<p>Be Proactive. We do not just “punch the clock.” Each day we seek new opportunities to add value to the company and our clients.</p>
<p>Use honest, direct and thoughtful communication. Strong communication skills are the backbone of our client-service focus. Make sure to listen as much as you speak. Focus on empowering coworkers and clients, not on controlling the conversation.</p>	<p>Be Accountable. Take responsibility for your actions and quality of work. We believe that no one is more responsible for our performance than ourselves.</p>
<p>Be Professional. We present ourselves in our manners, actions and appearance, so make others feel comfortable and respected.</p>	<p>Be Adaptable. Our clients and clients span across a diverse range of industries, cultures and geography. As we value the uniqueness of each individual, we create more engaged and efficient teams.</p>
<p>Be Creative. We value new ideas, encourage innovative thinking and embrace change. We foster an entrepreneurial spirit and are open-minded to any suggestion or idea that increases the quality and value of our services.</p>	<p>Be Fully Committed. We focus on cooperation, not competition. As a team member, we are each committed to the shared mission of East Coast Risk Management and to holding one another accountable to it.</p>
<p>Celebrate Successes. Our greatest successes occur when we come together and work as a cohesive team.</p>	

1.2 Client Relations

Our clients are very important to us. One of our highest priorities at ECRM is to help any client or potential client with courteous, friendly and prompt service.

Good client relations can build greater client loyalty. With that in mind, we expect all employees to exercise courtesy and thoughtfulness as you interact with people—whether on the phone, in writing or in person.

On the phone: When answering the phone, extend a greeting, state the Company name, and then give your name. Example: “Good morning, thank you for calling East Coast Risk Management, this is John speaking, how may I direct your call”.

If the person with whom the caller wishes to speak is on another line, ask the caller if you can help them with something. If they say no, ask if he/she desires to be placed on hold or would prefer to leave a voicemail.

If a caller has been placed on hold, offer to have the call returned if the person with whom he/she wishes to speak is not available within a reasonable time.

When a caller leaves a name, number, or message, make sure it is recorded correctly by repeating the information to the caller. Then, make sure the information is given to the appropriate individual as soon as possible.

Enact the “away message” on your phone when you know you will be out of the office during regularly scheduled hours.

In writing: Employees should respond to all e-mails and letters in a timely manner. If you can’t fulfill a request promptly, acknowledge the email and let the sender know when you might be able to address their question or request.

Keep clients and fellow employees informed of your availability by using the “out-of-office” assistant if you will be out of the office or unavailable during regularly scheduled hours.

Be careful how you interpret written messages as the writer’s intent or “tone” can be easily misunderstood. Give the writer the benefit of the doubt.

Don’t write any messages or letters while you are frustrated or upset. Take time to gather your thoughts and come back to it with a fresh view.

In person: Employees are expected to present a clean and neat appearance at all times so as not to offend clients and fellow employees.

Treat all clients and fellow employees with respect, being careful to control your temper and keep your language respectful.

It is unnecessary to establish harsh, restrictive guidelines for behavior if each of us uses good judgment and discretion in our dealings with each other and with our clients. This “rule of reason” can be applied to any situation. Before you act or react, consider the effect of your behavior on other employees or the Company.

1.3 Business Ethics & Conduct

We expect the Company employees to be ethical in their conduct. It affects our reputation and success. The Company requires employees to carefully follow all laws and regulations and have the highest standards of conduct and personal integrity.

Our continued success depends on our clients' trust. Employees owe a duty to the Company, our clients and shareholders to act in ways that will earn the continued trust and confidence of the public.

As an organization, the Company will comply with all applicable laws and regulations. We expect all directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to not do anything that is illegal, dishonest, or unethical.

If you use good judgment and follow high ethical principles, you will make the right decisions. However, if you are not sure if an action is ethical or proper, you should discuss the matter openly with your supervisor. If necessary, you may also contact Human Resources for advice and consultation.

It is the responsibility of every Company employee to comply with our policy of business ethics and conduct. Employees who ignore or do not comply with this standard of business ethics and conduct may be subject to disciplinary action, up to and including possible termination of employment.

1.4 Disclaimer and Employment at-will Statement

This Employee Handbook contains information about ECRM's employment policies and procedures and an overview of our benefits. For specific information about employee benefits, you should refer to the plan documents, which are controlling. . The policies and procedures in this Handbook are guidelines only. ECRM reserves the right to interpret and administer the provisions of this Handbook as needed. Except for the policy of at-will employment, which can only be changed in writing by the President, ECRM has the maximum discretion permitted by law to change, modify or delete any provision in this Handbook at any time with or without notice. However, oral statements or representations cannot supplement, change or modify the provisions in this Handbook.

Each employee should read and become familiar with the information contained in this Handbook. Failure to comply with ECRM's policies or procedures may result in discipline, up to and including termination.

The provisions in this Handbook are not intended to in any way create any contractual obligations with respect to your employment. Unless you have an employment agreement, your employment is at-will and the Company has the right to terminate your employment at any time with or without notice.

1.5 Equal Employment Opportunity

At ECRM, it is our policy to provide equal employment opportunities to all employees and applicants for employment based on qualifications, abilities and merit. Therefore, ECRM prohibits any employment decisions that are made on the basis of race, color, religion, national origin, age, sex, genetics, citizenship, disability, past, current or prospective membership in the uniformed services or any other characteristic protected under applicable federal, state or local law. This policy applies to all terms and conditions of employment, including, but not limited to hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

No one will be subject to, and ECRM prohibits, any form of discipline, reprisal, intimidation or retaliation for good faith reports or complaints of incidents of discrimination of any kind, pursuing any discrimination claim or cooperating in related investigations. Questions or concerns about discrimination should be reported to your immediate supervisor or the President.

1.6 Anti-Harassment Policy

It is the policy of the Company that unlawful harassment of employees, on the basis of race, color, religion, national origin, age, sex, genetics, citizenship disability, past, current or prospective membership in the uniformed services or any other characteristic protected under applicable federal, state or local law, is unacceptable and will not be tolerated.

This policy applies to all employees. It covers harassment by employees of the Company (including supervisor and management), clients, vendors or other third parties with whom the Company has business dealings. The Company will not tolerate any unlawful harassment.

Unlawful harassment can take many forms. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, e-mail jokes or statements, pranks, intimidation, physical assaults or contact, or violence.

Sexual Harassment: Sexual harassment means any unlawful harassment based on someone's sex or gender. It includes unlawful harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request or conduct is made either explicitly or implicitly a term or condition of employment.

- Submission to or rejection of the advance, request or conduct is used as a basis for employment decisions.
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment.

ECRM's anti-harassment policy applies equally to harassment based on an employee's race, color, religion, national origin, sex, age, physical or mental disability, citizenship, genetic information, past, present or prospective service in the uniformed services or any other characteristic protected under applicable federal, state or local law. Such harassment often takes a similar form to sexual harassment and includes harassment that is:

- Verbal (for example, epithets, derogatory statements, slurs, derogatory comments or jokes).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying derogatory posters, cartoons, drawings or making derogatory gestures).

This list is illustrative only, and not exhaustive. No form of harassment will be tolerated.

Reporting Harassment of Any Kind: Any employee who feels that he or she has been the subject of harassment (or who has reason to believe that someone else has been the subject of harassment), including sexual harassment, has the obligation to notify his or her supervisor or other member of management in oral or written form. The complainant is expected to provide information that the Company requests, including a detailed account of the incidents complained of, witnesses (if any), dates and other information considered relevant by the Company. A prompt investigation of the matter will be made.

All employees – whether complainant, witness or accused – are required to be truthful, accurate and cooperative during the Company investigations. Information obtained during the investigation will only be told to another on a need-to-know basis

Anyone who is found to have engaged in prohibited harassment will be subject to appropriate sanctions, which may include termination of employment, depending on the circumstances.

No Retaliation: No one will be subject to, and ECRM prohibits, any form of discipline, reprisal, intimidation or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations.

1.7 Anti-Workplace Bullying

The Company considers workplace bullying unacceptable and will not tolerate it under any circumstances. This policy applies to all employees of ECRM, including supervisors, managers and executives. It applies during normal working hours, at work-related or sponsored functions,

and while traveling on work-related business. It includes treatment of fellow employees, clients, clients and other third parties.

Bullying is unwelcome or unreasonable behavior that demeans, intimidates or humiliates people either as individuals or as a group. The following are examples of behavior that the Company will consider to be bullying behavior:

- Abusive or offensive language, including being sworn at
- Insults or personal attacks
- Spreading rumors and innuendo
- Encouraging others to turn against the targeted employee
- Unwarranted or invalid criticism
- Trivializing of work and achievements
- Blame without factual justification
- Isolating people from normal work interaction including socially
- Excessive demands
- Setting impossible deadlines
- Unfairly blaming for mistakes
- Excessive supervision or micro-managing
- Practical jokes
- Belittling or disregarding opinions or suggestions
- Criticizing in public

The Company encourages all employees to report any instance of bullying in the workplace to your supervisor or human resources without fear of retaliation. Any reports of this type will be investigated promptly. Employees found to be in violation of this policy will be disciplined up to and including termination.

1.8 Accommodations for Disabilities

ECRM is committed to complying fully with the Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices are conducted on a non-discriminatory basis. It is the policy of ECRM to provide a reasonable accommodation to qualified individuals with disabilities unless the accommodation would impose an undue hardship on the organization. ECRM prohibits any harassment of, or discriminatory treatment of, employees on the basis of a disability or because an employee has requested a reasonable accommodation.

In accordance with the ADA as amended, reasonable accommodations will be provided to qualified individuals with disabilities to enable them to perform the essential functions of their jobs or to enjoy the equal benefits and privileges of employment. This policy applies to all applicants for employment and all employees. If you would like to request an accommodation, please contact the Human Resources department.

The Company expressly prohibits any form of discipline, reprisal, intimidation or retaliation against any individual for requesting an accommodation in good faith.

1.9 Religious Accommodations

ECRM encourages a diverse workforce and will make reasonable accommodations for an applicant's or an employee's sincerely held religious beliefs if the accommodation would resolve a conflict between the individual's sincerely held belief and a work practice or requirement unless doing so would create an undue hardship for the Company. Safety and impact on customer service is paramount and will therefore receive significant consideration when evaluating an accommodation request and identifying opportunities to meet the request. A determination as to whether a request for a religious accommodation will impose an undue hardship will be made on a case by case basis. Individuals who wish to request an accommodation should contact the Human Resources Department.

ECRM expressly prohibits any form of discipline, reprisal, intimidation or retaliation against any individual for requesting an accommodation in good faith.

1.10 Open Communications

ECRM encourages employees to discuss any issues they may have with a co-worker directly with that person. If a resolution is not reached, employees should arrange a meeting with their direct supervisor. If the concern, problem, or issue is not properly addressed, employees should contact the Human Resources Department. Any information discussed in an Open Communication meeting is considered confidential, to the extent possible while still allowing management to respond to the problem. Retaliation against any employee for appropriate usage of Open Communication channels is unacceptable.



2 GETTING STARTED

We understand that getting established in a new role can sometimes be overwhelming. To make your transition as smooth as possible, this section outlines what you can expect as a new employee.

2.1 Proof of Work Authorization

All offers of employment are contingent on verification of the candidate's legal right to work in the United States. U.S. Citizenship and Immigration Services require that the Company and new employee provide specific information for completion of the Form I-9, Employment Eligibility Verification within three days of commencing employment. Employees must complete Section 1 of Form I-9 no later than the end of their first day of work. Failure to provide the appropriate documentation for completion of the Form I-9 will result in suspension and/or termination.

2.2 Employee Background and Reference Checks

To ensure that individuals who join ECRM are well qualified and to ensure that ECRM maintains a safe and productive work environment, it is our policy to conduct pre-employment background checks on all applicants who accept an offer of employment. Background checks may include verification of any information on the applicant's resume or application form.

If an applicant refuses to provide the information necessary for the Company to conduct the necessary background checks or provide false information during the application process, ECRM will deny employment.

All offers of employment are conditioned on receipt of a background check report that is acceptable to ECRM. All background checks are conducted in conformity with the Fair Credit Reporting Act, the Americans with Disabilities Act, and state and federal privacy and antidiscrimination laws. Reports are kept confidential and are only viewed by individuals involved in the hiring process.

Background checks will include a criminal record check, although a criminal conviction does not automatically bar an applicant from employment. Any applicant with a criminal conviction shall be evaluated on an individual basis to determine whether they should be excluded from consideration based on the conviction.

Additional checks such as a driving record or credit report may be made on applicants for particular job categories if appropriate and job related.

ECRM also reserves the right to conduct a background check for current employees to determine eligibility for promotion or reassignment in the same manner as described above.

2.3 Introductory Period for New Employees

ECRM monitors and evaluates every new employee's performance during the first 90 days to determine whether further employment in a specific position or with ECRM is appropriate. At the same time, new employees have the opportunity to decide if ECRM provides the right work environment for them.



3 TOTAL COMPENSATION

The total compensation you receive for the work you do goes beyond the base salary you receive. Paid time off and comprehensive health benefits are all advantages, as well, that you receive by choosing to work for East Coast Risk Management.

3.1 Base Salary

The goal of ECRM's compensation program is to attract potential employees, meet the needs of all current employees and encourage well-performing employees to stay with our organization. With this in mind, our compensation program is built to balance both employee and company needs. Compensation may vary based on roles and responsibilities, individual, and company performance, and in compliance with all applicable laws. For any questions about your pay, please contact the Controller or your supervisor.

3.2 Employment Classification

Employees are designated as either non-exempt or exempt from federal and state wage and hour laws. Non-exempt employees are entitled to overtime pay under specific provisions of federal and state laws while exempt employees are not.

In addition to the non-exempt or exempt classification, employees are divided into the following categories:

- *Regular Full-time Employees:* A regular full-time employee is an employee who works 30 or more hours per week and is eligible for all company benefits.
- *Regular Part-time Employees:* A regular part-time employee is an employee who regularly works less than 30 hours per week. Regular part-time employees are eligible for PTO, Holidays and Bereavement Leave. Pay for Holiday and Bereavement Leave will be based on the employee's normal work hours (i.e., if an employee normally works four hours a day, his/her Holiday pay will equal four hours).
- *Temporary Employees:* Temporary employees are employees that are hired on a temporary basis. Temporary employees will not be eligible for any benefits unless required by law or approved by the President of ECRM.

3.3 Timekeeping Procedure

It is the policy of ECRM to comply with applicable laws that require employers to maintain records of the hours worked by non-exempt employees. It is the responsibility of all non-exempt employees to accurately record their time. This includes the time the employee begins and ends their work day, as well as the beginning and end of each meal period. Each employee shall also record the beginning and ending time of any departure from work for personal reasons.

In order to properly record your time, all non-exempt employees must utilize the electronic time system provided by ECRM. Hours must be submitted electronically prior to the end of the pay period. Non-exempt employees may not begin work before their scheduled starting time, work past their scheduled stopping time, or work overtime without prior authorization from their supervisor. Non-exempt employees are never permitted to work off the clock.

Logging in or out for another employee or falsification of a time record is a breach of Company policy and is grounds for disciplinary action up to and including termination.

Please be certain that hours worked and used leave time is recorded accurately. Falsification of a time sheet is a breach of Company policy and is grounds for disciplinary action up to and including termination. Please discuss any questions you may have about your pay with your supervisor or the Human Resources department.

3.4 Flexible Work Schedule

In order to improve employee productivity, reduce hardships from commuting and foster a greater work/life balance, the company has adopted a Flexible Schedule Program. As an employee of the company, you may be eligible for participation in the program. For additional details, please see ECRM's Flexible Schedule Policy.

3.5 Overtime Pay

Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour laws. All overtime work performed must receive the supervisor's prior authorization. Failure to receive supervisor approval prior to working overtime hours will result in discipline up to and including termination of employment.

The workweek at ECRM begins at 12:01 am on Sunday and ends the following Saturday.

3.6 Payroll & Payday

The company will pay employees on the 15th and last day of each month. In the event that the 15th or last day falls on a holiday or weekend, employees will be paid the last business day prior to the scheduled pay day.

Payment can be made via direct deposit or check. Employee's wishing to have wages directly deposited into multiple bank accounts may do so, simply by filling out a direct deposit authorization form.

Pay stubs can be viewed online. Please make every effort to review your paystub each pay period. Every effort is made to avoid errors in your paycheck. If you believe an error has been made, notify the Controller immediately. He/she will take the necessary steps to address the problem and to ensure that any necessary correction is made promptly.

3.7 Mandatory Deductions

ECRM is required by law to make certain deductions from your paycheck. Among these are applicable federal, state and local income taxes and your contribution to Social Security as required by law. These deductions will be itemized on your check stub. The amount of the deductions will depend on your earnings and on the information you furnish on your W-4 form regarding the number of exemptions you claim. If you wish to modify the number of exemptions you claim, please complete a new W-4 form. Only you may modify your W-4 form. And verbal or written instructions are not sufficient to modify withholding allowances. We advise you to check your pay stub to ensure that it reflects the proper number of withholdings.

The W-2 form you receive annually reflects how much of your earnings were deducted for these purposes.

Wage Garnishments: Any other mandatory deductions to be made from your paycheck, such as court-ordered garnishments, will be explained to you whenever ECRM is required to make such deductions from your pay.

3.8 Salary Basis Policy

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.

However, the FLSA provides an exemption from both minimum wage and overtime pay for certain employees in particular job functions which meet certain criteria regarding job duties and salary.

Salary Basis Requirement: Being paid on a "salary basis" means an employee regularly receives a predetermined amount of compensation each pay period. The predetermined amount cannot be reduced due to quality or quantity of the employee's work. Subject to certain exceptions, an exempt employee must receive the full salary for any workweek in which the employee performs any work, regardless of the number of days or hours worked. Exempt 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.

Employers may make y deductions from an exempt employee's pay in the following circumstances:

Full day absences where a full day deduction will be made:

- Absence from work for one or more full days for personal reasons (not sickness/disability);

- Absence from work of one or more full days due to sickness/disability if the deduction is made in accordance with plan, policy or practice of providing compensation for salary lost; and
- Unpaid disciplinary suspensions of one or more full days due to workplace conduct rule violations.

Full or partial day absences where a full or partial day deduction will be made

- To offset amounts employees receive as jury or witness fees, or for military pay;
- During initial or last week of employment;
- For penalties imposed for infractions of safety rules of major significance;
- When employees takes unpaid leave under the Family and Medical Leave Act.

It is ECRM's policy to comply with the salary basis requirements of the FLSA. Therefore, we prohibit all company managers from making any improper deductions from the salaries of exempt employees. We want employees to be aware of this policy and that the company does not allow deductions that violate the FLSA.

If you believe that an improper deduction has been made to your salary, you should immediately report this to your direct supervisor, or to Human Resources. 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.

3.9 Performance Reviews

We encourage you and your supervisor to discuss job performance and goals on an informal, day-to-day basis. In addition, you and your supervisor will have periodic formal performance evaluations to discuss your quality of work, goals and to identify areas of improvement.

YOUR TIME OFF & LEAVES

East Coast Risk Management understands that you will be at your best when you are able to meet your personal needs and enjoy regular rest and relaxation. That is why we offer paid time off benefits to our employees.

3.10 Holidays

All regular employees of ECRM are eligible for holiday pay. The Company recognizes the following holidays as paid holidays:

- | | |
|--------------------|----------------------------|
| • New Year's Day | • Thanksgiving Day |
| • Good Friday | • Day after Thanksgiving |
| • Memorial Day | • Christmas Eve (1/2 day) |
| • Independence Day | • Christmas Day |
| • Labor Day | • New Year's Eve (1/2 day) |

In addition, the Company may, at its sole discretion, provide an additional day off immediately before or after a recognized holiday dependent upon the day of the week the holiday falls. Such notice of an additional day off will come from the Human Resources Department or another member of upper management. A recognized holiday that falls on a Saturday will be observed on the preceding Friday. A recognized holiday that falls on a Sunday will be observed on the following Monday.

The Company will not count holiday paid time off as hours worked when calculating overtime.

3.11 Paid Time Off

Paid Time Off (PTO) provides you with the flexibility to use your time off to meet your personal needs, while recognizing your individual responsibility to manage your paid time off. You will accumulate a specified amount of PTO each pay period worked and it is up to you to allocate how you will use it – for vacation, illness, caring for children, school activities, medical/dental appointments, personal business or emergencies. The amount of PTO earned will depend on your length of your service with the Company.

ELIGIBILITY: You are eligible to receive PTO if you are a regular full-time or part-time employee.

ACCRUAL SCHEDULE FOR REGULAR FULL-TIME EMPLOYEES: The amount of PTO you accrue each year is based on your length of service and accrues according to the Accrual Schedule chart set forth below. You may accrue up to 1.5 times your annual allotment in your PTO, thus building a surplus for a planned absence. For example, if you earn 15 days per year, you can accrue up to 22.5 days in your PTO bank. Once you accrue the maximum allotment of PTO (1.5x your annual allotment), you will not accrue any additional days until you use PTO time. You may use days that you have not yet accrued which will result in your PTO balance going negative. However, advancement of PTO days that you have not yet earned may not exceed a maximum of five (5) days per year and can only be done with supervisor approval. In the event of termination, an employee with a negative PTO balance will have those days deducted from their final pay.

PTO will accrue at the following schedule:

Length of service	Accrual rate/month	PTO days earned
Up to 24 months	1.25 days	15
25 – 48 months	1.5 days	18
Over 49 months	1.75 days	21

You will not accrue PTO time while you are on an unpaid leave of absence or suspension by the Company. PTO days will not be bought back at the end of the year, just accrued in one's PTO bank.

ACCRUAL SCHEDULE FOR REGULAR PART-TIME EMPLOYEES: Regular part-time employees will accrue 0.5 days per month, totaling six PTO days in a 12-month period. The maximum accrual

amount is 9 days. Once a part-time employee reaches 9 days in his or her PTO bank, no additional days will accrue until the employee uses a PTO day.

END OF EMPLOYMENT: Employees who voluntarily leave the Company, giving at least three weeks written notice as described in this policy, will be paid for any unused, accrued PTO. Employees who fail to provide at least three weeks written notice or who leave involuntarily (with the exception of a layoff) will forfeit the payout of any unused, accrued PTO at the end of employment.

In addition, if you used PTO days in advance of when you accrued them, any used but unearned PTO will be deducted from your final pay.

PTO USE UPON RESIGNATION: Employees who give a written notice of resignation of employment from ECRM may not use any accrued PTO from the date of the notice through the end of employment.

MANAGEMENT OF PTO: You are responsible for managing your PTO account. It is important that you plan ahead for how you will use it. This means developing a plan for taking your vacations, as well as doctor's appointments and personal business. It also means holding some time in "reserve" for the unexpected, such as emergencies and illnesses.

MINIMUM INCREMENTS OF PTO: If you are non-exempt, you may not take less than one hour off at a time. If you are an exempt status employee you must take PTO in increments of not less than one-half day.

NOTICE AND SCHEDULING: You are required to provide your supervisor with reasonable advance notice and obtain approval prior to using PTO. This allows for you and your supervisor to prepare for your time off and assure that all staffing needs are met. There may be occasions, such as sudden illness, when you cannot notify your supervisor in advance. In those situations, you must inform your supervisor of your circumstances as soon as possible.

RECORDING PAID TIME OFF: All PTO requests must be submit electronically, via the Company's self-service portal. All requests are immediately routed to your supervisor for review. Upon approval or denial, you will receive an e-mail confirmation from the self-service portal. A record of your PTO accruals, use and time remaining is also available via the self-service portal.

3.12 Bereavement Leave

The Company provides bereavement leave to employees who need to take time off because an immediate family member died.

Employees who wish to take time off due to the death of an immediate family member should notify their supervisor immediately via email.

Up to three days of paid bereavement leave will be provided to full-time employees. For bereavement leave, "immediate family" means your spouse, parent, child, brother, or sister;

your spouse's parent, child, brother, or sister; your child's spouse; your grandparent or your grandchild. We will also consider requests for bereavement leave if someone dies who was as close to you as an immediate family member.

3.13 Jury Duty

ECRM is committed to supporting the communities in which we operate, including supporting our employees in fulfilling their responsibilities to serve as jurors whenever it is possible. You may request paid jury duty leave for the absence. Employees will be compensated for up to five days of jury duty. The Company will, on a case by case basis, consider compensating an employee for jury duty that extends beyond five days.

If you get a jury duty summons, show it to your supervisor as soon as possible. This will help us plan for your possible absence from work. We expect you to come to work whenever the court schedule permits.

Either you or the Company may ask the court to excuse you from jury duty if necessary. We may ask that you be relieved from going on jury duty if we think that your absence would cause serious operational problems for the Company.

Subject to the terms, conditions, and limitations of the applicable plans, the Company will continue to provide health insurance benefits for the full period of unpaid jury duty leave.

ECRM will not take any adverse action against you because of time lost as a result of reporting for jury duty or responding to a subpoena.

3.14 Leave of Absence for Medical or Parental Reasons

ECRM recognizes and understands that there may be circumstances under which an employee may need to take an unpaid leave of absence for medical or parental reasons. The purpose of this policy is to set forth the conditions under which ECRM may approve a leave of absence of an employee for such a reason.

Unless a longer time period is otherwise required by law, ECRM will consider allowing an employee to take an unpaid leave of absence of up to six weeks for a medical condition of the employee where s/he is unable to perform the essential functions of the job. Employees must request a medical leave at least two weeks in advance, unless such is not practically possible. The need for a medical leave must be substantiated by a medical certification indicating the employee cannot perform the essential functions of the job, the beginning date of the leave and the expected length of such leave. Updated certifications may be requested by ECRM during the leave if the circumstances require. In addition, ECRM reserves the right to require a fitness for duty certification prior to the employee returning from an approved medical leave of absence to ensure s/he is capable of performing the essential functions of the job, with or without a reasonable accommodation.

ECRM will also consider allowing an employee to take an unpaid leave of absence of up to six weeks to care for an immediate family member that is injured or ill. "Immediate family member" for purposes of this policy is defined as a spouse, domestic partner, parent, brother, sister, child or grandparent. Employees granted leave for this reason will not be permitted to take leave intermittently. ECRM will require a medical certification evidencing the need for leave to care for the immediate family member. The certification must also contain the beginning date of the leave and expected length of such leave. Updated certifications may be requested by ECRM during the leave if the circumstances require.

UNPAID PARENTAL LEAVE OF ABSENCE: Unless a longer time period is otherwise required by law, ECRM will allow a six week parental leave of absence period for both male and female employees for the birth and caring of a new born child. Employees must request a parental leave at least two weeks in advance, unless such is not practical. Employees must provide proof of birth of the child upon request by ECRM.

INTERPLAY WITH SHORT TERM AND LONG TERM DISABILITY BENEFITS: A leave of absence granted under this policy will run concurrently with any short term or long term disability benefits that the employee receives.

ACCRUAL AND USE OF PAID TIME OFF: Employees do not accrue any paid time off while on a leave of absence pursuant to this policy. In addition, employees must use ten days of accrued paid time off, if available, during the first ten days of leave taken under this policy. These ten days of paid time off will run concurrently with any leave of absence granted hereunder. If less than ten days of accrued paid time off is available at the time leave begins, the employee must then use 50% of his or her accrued balance during the first ten days of leave. Employees may choose to use more than ten days of unused PTO, if available, under any leave granted pursuant to this policy. This paid time off will also run concurrently with any leave granted under this policy. In the event that an employees does not have or is not eligible for short term disability benefits, the employee must use all available paid time off while on leave.

3.15 Military Leave

ECRM recognizes that employees may need to be absent from work to serve in the U.S. military. ECRM provides military service leaves of absence to all full-time, part-time and introductory employees in compliance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and applicable state laws.

If you need to take military service leave, you or an authorized military service officer should provide advance notice to your supervisor or the Human Resources Department. When possible, you should give at least 30 days' notice of your request for leave. If 30 days' notice is not possible because of military necessity or for other reasons, you should give as much advance notice to ECRM as possible. The Company reserves the right to request a copy of your military orders or training paperwork.

Military service leave is unpaid. However, employees may use any or all of their accrued but unused vacation or other paid time off during their military service leave.

During military service leave, all benefits provided under an employee benefit plan are governed by the terms and conditions of the applicable employee benefit plan documents in accordance with applicable law.

You may be eligible for reemployment after your military service leave. If you would like to return to work, you must report to work or submit an application for reemployment to the Human Resources Department, including your military discharge documentation, if available, as follows:

- If your military service was for less than 31 days, you must report to work on the first regularly scheduled workday that is at least eight hours after you return home from military service.
- If your military service was for 31 to 180 days, you must apply for reemployment within 14 days following completion of military service.
- If your military service was for more than 180 days, you must apply for reemployment within 90 days following completion of military service.

Employees who do not report to work or apply for reemployment within the applicable timeframe will be subject to ECRM's rules about unexcused absences. Nothing in this policy requires ECRM to reemploy individuals who are not eligible for reemployment rights under applicable law.

If you are eligible for reemployment, you will be reemployed with the same seniority, and all rights and benefits based on that seniority, that you would have attained if you had not taken military leave. Seniority rights include pay and benefits that accrue or are determined based on your length of service.

ECRM prohibits and will not tolerate discrimination or retaliation against any employee or applicant because of that person's membership in or obligation to perform service for any branch of the U.S. military.

Where state or local military service leave laws offer more protections or benefits to employees, the protections or benefits that are most favorable to the employee, as provided by such laws, will apply.

YOUR BENEFITS & PERKS

East Coast Risk Management offers a comprehensive benefits package for eligible employees and each benefit plan has separate eligibility conditions. This section provides a brief overview of the programs offered. For additional information, contact the Human Resources department.

3.16 Health Benefits

Eligible employees may choose to enroll in our medical, dental and vision insurance plans. All plan benefits are described in detail in the Summary Plan Descriptions prepared by the insurance carrier and available to all eligible employees for review.

Special enrollment periods may apply to you and/or your dependent(s) if you have a qualifying event according to the plan documents and applicable law. A qualifying event could be a marriage, birth or adoption, or if you and/or your dependent are no longer eligible for coverage under a plan in which you or your dependent was previously enrolled. If you experience a qualifying event, notify the Human Resources department immediately.

3.17 Disability Insurance

Eligible employees may choose to enroll in our short term or long term disability insurance plan. The summary plan descriptions explain long-term and short-term disability benefits. Please refer to it for details.

3.18 Retirement Plan

ECRM supports employee retirement preparation and investment by providing eligible employees with a 401(k) Plan. The details regarding participation, contributions, vesting, administration, and investments are provided in the Summary Plan Description.

3.19 Workers' Compensation

ECRM complies with all state and federal laws pertaining to workers' occupational safety and any occupational injuries or illnesses arising in the course of employment. Any work-related injury or illness shall be reported to your supervisor immediately, no matter how slight or inconsequential that it may seem. Prompt reporting helps to make sure that you qualify for coverage as quickly as possible and lets us investigate the matter promptly. Failure to immediately report any work related accident may result in disciplinary action.

If you have questions regarding a work related accident or Workers' Compensation claim, please contact your supervisor or Human Resources representative.



4 WORKPLACE EXPECTATIONS & PROCEDURES

East Coast Risk Management wants you to have everything you need to do the best job possible in a safe, professional environment. This section outlines our mutual commitments and expectations.

4.1 Conflict of Interest

The Company has guidelines to avoid real or potential conflicts of interest. It is your duty as an employee of the Company to comply with the following guidelines about conflicts of interest. If this is not clear to you or if you have questions about conflicts of interest, contact the President.

What is a conflict of interest? An actual or potential conflict of interest is when you are in a position to influence a decision or have business dealings on behalf of the Company that might result in a personal gain for you or for one of your relatives. For conflicts of interest, a relative is any person who is related to you by blood or marriage, or whose relationship with you is similar to being a relative even though they are not related by blood or marriage. It would also include anyone with whom you co-habitate.

We do not automatically assume that there is a conflict of interest if you have a relationship with another company. However, if you have any influence on transactions involving purchases, contracts, or leases, you must tell an officer of the Company as soon as possible. By telling us that there is the possibility of an actual or potential conflict of interest, we can set up safeguards to protect everyone involved.

The possibility for personal gain is not limited to situations where you or your relative has a significant ownership in a firm with which the Company does business. Personal gains can also result from situations where you or your relative receives a kickback, bribe, substantial gift, or special consideration as a result of a transaction or business dealing involving the Company.

Employees interested in taking outside work that may be considered a conflict of interest must first discuss the opportunity with ECRM's President. Examples of work that may be considered a conflict of interest are:

- Conducting safety training for a company that is not a client of ECRM.
- Creating policies or manuals for a company that is not a client of ECRM.
- Offering safety consultations to a company that is not a client of ECRM.
- Offering human resource consultations to a company that is not a client of ECRM.
- Offering claims management services to a company that is not a client of ECRM.
- Serving as a board member for an outside commercial company or organization.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Accepting gifts valued at more than \$100, discounts, favors or services from a client/potential client, competitor or supplier, unless equally available to all company employees.

Failure to comply with this policy may result in disciplinary action up to and including termination.

4.2 Confidential Information and Nondisclosure

It is very important to the Company that we protect our confidential business information and trade secrets and those of our clients. Confidential information includes, but is not limited to, the following examples:

- compensation data related to third parties including contractors, clients, vendors, etc.
- computer processes
- computer programs, codes and passwords
- customer/client lists
- any information concerning a customer , including, but not limited to, financial data, trade secrets or business operations
- financial information of the company;
- labor relations strategies
- marketing strategies
- new materials research
- negotiations and service agreement proposals regarding prospective and current clients, including service agreement terms
- terms of a service agreement with any current client
- proprietary production processes
- research and development strategies
- technological data
- dates of birth, social security numbers, addresses or phone numbers of an employee

If you improperly use or disclose a trade secret or confidential business information, you will be subject to disciplinary action, up to and including termination of employment and legal action. This applies even if you do not get any benefit from releasing the information.

4.3 Outside Employment

Employees are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below.

Activities and conduct away from the job must not compete with, conflict with or compromise the company interests or adversely affect job performance and the ability to fulfill all job responsibilities. Employees are prohibited from performing any services for clients on nonworking time that are normally performed by ECRM. This prohibition also extends to the unauthorized use of any company tools or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during paid working time.

Employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel or refusal to work overtime or different hours. If ECRM determines that an employee's outside work interferes with performance, the employee may be asked to terminate the outside employment.

Employees on a leave of absence, whether medical or non-medical, are not permitted to engage in outside employment while on leave. Engaging in outside employment while on a leave of absence may result in termination of employment.

4.4 Commentary and Publications Policy

At ECRM, we are sometimes called upon by our clients, prospective clients, business partners and the news media ("collectively "third parties") to provide oral or written information or opinions regarding subjects of which we have knowledge and expertise due to our education and experiences at ECRM. When called upon to provide such information, employees must follow company policy. For more information, please see ECRM's Commentary and Publications Policy.

4.5 Drug and Alcohol Policy

It is the policy of ECRM to create a drug-free workplace. The use of illegal drugs is inconsistent with the behavior expected of employees, subjects all employees to unacceptable safety risks and undermines the Company's ability to operate effectively and efficiently. Therefore, unlawfully selling, distributing, purchasing and possessing illegal drugs or drug paraphernalia at the workplace or while engaged in Company business is strictly forbidden. Additionally, the consumption of alcohol on the Company's premises is restricted to special events sponsored, organized or hosted by ECRM. Other than special company sponsored events, employees are not permitted to possess, consume or be under the influence of alcohol at any time while on Company business or property.

This policy applies to all employees of ECRM, without exception, including part-time and temporary employees.

Employees taking medication for which they have a valid prescription while on the job must do so in a way that is consistent with the manner prescribed and use must not pose a risk to the safety of the employee or others. Employees in safety sensitive positions should report the use of prescription medications while on the job to their supervisor if consumption would impair the employee's mental or physical capacity.

ECRM will not tolerate employees who report for duty while impaired by use of alcoholic beverages or drugs.

All employees should report evidence of alcohol or drug use that violates this policy to a supervisor or a personnel representative immediately. In cases where the use of alcohol or

drugs poses an imminent threat to the safety of persons or property, an employee must report the violation. Failure to do so could result in disciplinary action for the non-reporting employee.

Employees who violate the Drug and Alcohol Policy will be subject to disciplinary action, up to and including termination.

As a part of our policy to ensure a substance-free workplace, employees may be asked to submit to a drug and/or alcohol test under any of the following circumstances:

Pre-Employment: As a condition of employment, all job applicants will be required to produce a negative drug screen result prior to the assumption of duties. All applicants will be notified of this condition during the interview process. A confirmed positive drug screen by any applicant will result in the revocation of his/her job offer and the denial of future employment opportunities with the Company.

Post-Accident Testing: As part of an investigation of any accident that occurs while performing work related duties when: the employee caused or contributed to an accident that seriously damaged property or caused an injury to themselves or another person requiring medical treatment; and/or where there is reasonable suspicion that alcohol and/or drugs contributed to the accident.

Reasonable Suspicion: When there are reasonable grounds for believing an employee is under the influence of alcohol or drugs. Reasonable suspicion will exist when a supervisor or other person of authority has a reasonable belief based on objective factors, including, but not limited to, the employee's appearance, speech, behavior or body odor, that suggest that the employee is under the influence of drugs or alcohol. In addition, possession of drugs, paraphernalia or an open container of alcohol by the employee, unless at a special company sponsored event, may also give rise to reasonable suspicion of use.

It is a condition of your continued employment with the Company that you comply with the Drug and Alcohol Policy. A refusal to submit to a drug or alcohol test upon request by the Company will result in discipline up to and including termination.

Nothing in the Drug and Alcohol Policy shall be construed to alter or amend the at-will employment relationship between ECRM and its employees.

Employees with questions regarding this policy should contact the Human Resources department.

4.6 Attendance and Punctuality

To maintain a productive work environment, ECRM expects employees to be reliable and punctual in reporting for work. Absenteeism and tardiness place a burden on other employees and the company.

From time to time, it may be necessary for an employee to be late or absent from work because of emergencies, illnesses, or pressing personal business that cannot be scheduled outside work hours. It is the responsibility of all employees to contact their immediate supervisor prior to their scheduled starting time if they will be absent or late. It is within the sole discretion of management to categorize your absence or tardiness as excused or unexcused and permit the use of any paid time off that may be available.

You will be considered to have taken an unexcused absence if you are absent from work during scheduled work hours without permission, including full or partial day absences, late arrivals and early departures.

If an employee is absent without calling in (no call/no show) for three days, it will be assumed that the employee has voluntarily resigned.

4.7 Meal Periods

Non-exempt employees are allowed a thirty-minute unpaid lunch break between the hours of 11:00 a.m. and 2:00 p.m.

4.8 Personal Appearance

Personal appearance means how you dress, how neat you are, and your personal cleanliness standards. Your personal appearance can influence what clients and visitors think about the Company. Personal appearance can also impact the morale of your co-workers.

During business hours or whenever you represent the Company, you should be clean, well groomed, and wear appropriate clothes. This is particularly important if your job involves dealing with clients or visitors in person.

If your supervisor finds that your personal appearance is inappropriate, you will be asked to leave work and return properly dressed and groomed. If you are asked to leave, you will not be paid for the time you are away from work. See your supervisor if you are not sure about the correct clothing standards for your job.

Where necessary, the Company may make a reasonable accommodation to this policy for a person with a disability.

4.9 Personal Property

The Company cannot be responsible for personal property that is lost, damaged or stolen. If you bring personal property/items/belongings into the office or company property, you are responsible to keep track of them.

Also the Company prohibits any items on the premises or worksite that are sexually suggestive, offensive, or demeaning to specific individuals or groups, along with firearms or other weapons. Employees should understand that all personal property brought onto the employer's premises may be inspected for purposes of enforcing the organization's policies and to protect against theft.

4.10 Use of Personal Vehicles for Company Business

The following guidelines must be followed at all times by all employees operating personal vehicles on company business. An employee's failure to abide by any of the following requirements will lead to disciplinary action up to and including termination:

Driver Guidelines and Reporting Requirements

- Employees must have a valid and current driver's license to operate a personal vehicle with current auto insurance to operate the vehicle on company business. Any employee who operates a personal vehicle on company business shall notify their supervisor by 9:00 AM eastern time the next business day if their driver license has been suspended or revoked, and must immediately discontinue operating the vehicle. Drivers must also report all ticket violations received during the operation of a personal vehicle on company business.
- Employment may be terminated if the employee's license is suspended or revoked and driving is an essential function of the job.
- Employees must report any accident that occurs in their personal vehicle during company business to their supervisor immediately. This includes all accidents whether or not another vehicle was involved and regardless of the extent of damage or lack of injuries.

Driver Safety Rules

- The use of personal vehicles for company business while under the influence of alcohol, intoxicants or other drugs (which could impair driving ability) is forbidden and is sufficient cause for discipline, up to and including termination of employment.
- Employees who make or take work-related calls while driving are required to use a hands-free cell phone. Such calls should be kept short and, where possible, you should locate a lawfully designated area to park to continue the call. Employees are strictly prohibited from (i) making or receiving personal calls, or (ii) sending or receiving text messages, emails, instant messages, or any other form of electronic communication while operating a personal vehicle while on Company business.
- Because motor vehicle accidents represent one of the largest groups of occupational fatalities, employees driving any vehicle while on company business must exercise due diligence to drive safely by: a) following all traffic laws, and b) avoiding distractions while driving (such as eating or drinking; adjusting radio or temperature controls; focusing attention towards passengers or objects, persons or events outside the vehicle; personal grooming; etc.).
- Employees are not permitted under any circumstances to operate any vehicle while on company business when a physical or mental impairment may cause the employee to drive unsafely. This prohibition includes circumstances in which the employee is temporarily unable to operate a vehicle safely or legally because of illness or injury, medication, fatigue, intoxication, or while under the influence of drugs.
- Seat belts must be worn at all times, even if air bags are available.
- Applicable federal, state and local laws, including speed limits, must be obeyed at all times.

Please remember that your primary responsibility is to focus on the road and drive safely.

Employees who regularly use personal vehicles for company business are required to maintain automobile insurance with the limits of 100/300. Employees who occasionally use personal vehicles for company business are required to maintain automobile insurance in an amount that is no less than the minimum amount as required by applicable state law. Employees will be required to submit a declarations page as proof of adequate insurance to the Controller once per year.

ECRM is not responsible for any damage to employee's personal cars while on company business.

4.11 Business Travel Expense Reimbursements

ECRM will reimburse you for reasonable business travel expenses. The company reimburses approved travel expenses such as transportation, meals, lodging, and other costs as long as they were necessary to meet the objectives of the trip. You are expected to keep expenses within reasonable limits.

It is a very serious matter if you record false or misleading information on your expense report. You may not request reimbursement for expenses that you did not have or that were not business-related. Employees who do not follow this business travel policy could be subject to disciplinary action, up to and including termination of employment.

If you are involved in an accident while on business travel, immediately report the accident to your supervisor. The Company is not responsible for damage to your personal automobile when you are using it for Company business.

If you use a vehicle owned, leased, or rented by the Company, you may not use that vehicle for personal reasons unless you get advance approval.

When you must use your personal vehicle to conduct company business, ECRM will reimburse you according to the Business Expense Reimbursement Policy. The reimbursement rate takes into account all actual automobile expenses such as fuel and lubrication, repairs, replacements, tires, depreciation, insurance etc.

Employees are required to carpool with co-workers whenever possible if traveling to a client or appointment together. If it is discovered that two or more employee's drove to the same destination when it was more economical to carpool, the company reserves the right to deny reimbursement of expenses to all affected employees. For additional information, please refer to ECRM's Business Expense Reimbursement Policy.

4.12 Use of Company-Owned Equipment and Systems

This policy applies to all company-owned equipment and systems used by employees of ECRM including, but not limited to, cell phones, laptops, computers, email, internet access, external electronic bulletin boards, phones, voicemail, fax machines and copy machines (hereinafter "company equipment" or "ECRM equipment").

ECRM equipment and systems contain information owned by ECRM, including confidential business information, trade secrets and confidential information pertaining to its clients and its employees. ECRM is ultimately responsible for the protection of its confidential information and must be able to control its access and dissemination. ECRM can also be responsible, in certain cases, if one of its employees uses its company equipment in a manner that is unethical or unlawful.

ECRM equipment is provided to employees for conducting and facilitating company business. It is not intended for personal use or personal entertainment. Brief and occasional use is acceptable as long as it is not excessive, occurs during lunch or other break times and does not result in an expense to ECRM. Use is defined as “excessive” if it interferes with employee productivity during the normal workday.

Employees are responsible for using all equipment, including the Internet, in a manner that is professional, ethical and lawful. Use of company equipment and systems that is disruptive, offensive or harmful to morale will not be tolerated. Use must comply with all company policies regarding harassment, retaliation, use of social media, nondisclosure, confidentiality and any other relevant employee conduct policy.

All ECRM equipment used by employees and all information transmitted by, received from, or stored on any company system or equipment is the property of ECRM. To ensure proper use of these systems and equipment, ECRM may monitor their use from time to time. Employees should have no expectation of privacy in connection with the use of this equipment, or with the transmission, receipt, or storage of information in this equipment. ECRM has the capability to retrieve email and voicemail messages even after deletion or erasure, and the use of passwords on the email and voicemail systems does not mean that messages stored on those systems are confidential from ECRM or not subject to retrieval by others. ECRM provided computer equipment and the information stored in such equipment is the property of the ECRM. ECRM reserves the right, in its complete discretion, to review any employee’s voicemail or email files, messages, and usage at any time without advance notice or permission. No employee should attempt to gain access to anyone else’s files, email or voicemail messages or other information. Only the Company’s executive management reserves the right to and may enter an employee’s email, voicemail or other files.

Passwords are required for the use of any company-owned cell phone, computer, laptop and voicemail. A password is also required for use of company-owned software, such as Salesforce. Employees are not permitted to share their passwords with anyone, including other employees. Employees must not allow another person, including another employee, to use company equipment that has been assigned to him/her for their use. In addition, employees may not allow another person to access, use or view their company password protected accounts or data contained therein, including Salesforce, since ECRM has restricted access to certain data to a limited group of employees.

Non-exempt employees may not use their company equipment for work purposes outside of their normal work schedule without authorization in advance from management. This includes, but is not limited to, receiving, sending and responding to emails or text messages, responding to calls or making calls. In the event that such advance authorization is given, non-exempt employees must track all time worked outside of normal work hours.

All employees are prohibited from using their company equipment during any leave of absence, whether paid or unpaid, without advance approval from ECRM. ECRM reserves the right to deactivate an employee's password, ECRM applications and access to its network during leave.

Employees must notify ECRM within 24 hours if any company property has been lost, stolen or damaged so that ECRM can disable access to the company property and network.

Employees who violate the terms of this policy will be subject to discipline up to and including termination of employment.

Upon termination of employment, whether voluntary or involuntary, employees must return all company property, including, cell phones, laptops, computers, computer-related equipment, keys, credit cards, or any other company property provided to or used by the employee during employment with ECRM. Employees will be responsible for all associated costs if they fail to return company property at termination of employment. Employees will also be responsible if company property is lost or damaged either during employment or at termination.

4.13 Use of Cell Phones

The Company provides cellular telephones to selected employees as appropriate to their duties and responsibilities and to facilitate communications with our clients. Employees are expected to restrict their use of Company cell phones to matters involving Company business. Limited personal use of Company cell phones is acceptable as long as it does not interfere with work performance or present an undue financial hardship on the Company.

Employees provided company cellular phones or receiving reimbursement for a cellular phone are responsible for answering and/or returning calls from ECRM management or clients within a reasonable time frame, whether those calls are received during regular work hours or after. Though management respects your personal time, they may occasionally need to call during non-working hours as client emergencies can arise at any time.

Employees are prohibited to use a cell phone while driving, whether it is a company-owned cell phone or a personal cell phone, in the course of performing their job. If an employee needs to make a call while driving, they should find a proper parking space first or use a hands-free device.

4.14 Bring Your Own Device

This Bring Your Own Device ("BYOD") policy applies to all laptops, computers, smart phones, iPads, tablets and any other personal electronic device owned by an employee that is used for work purposes.

When used for work purposes, personal devices contain information owned by ECRM, including confidential business information, trade secrets and confidential information pertaining to its clients and its employees. ECRM is ultimately responsible for the protection of its confidential information and must be able to control its access and dissemination.

Employees must receive prior authorization from ECRM to use their personal device for work purposes. Installation of ECRM applications and access to its network will be installed by ECRM on the personal device.

In order to prevent unauthorized access to personal devices used for work purposes, employees must ensure that their personal device requires a password to access the device. The password must then lock itself if it's idle for one minute or more. Employees should not let any other person, including family or friends, use or access their personal device that is used for work purposes.

ECRM policies pertaining to harassment, discrimination, retaliation and confidential information apply to the use of personal devices for work related activities. Excessive personal calls or texts during the work day are not permitted. Use of personal devices during the work day for personal reasons should be minimal and be restricted to lunch and breaks.

Non-exempt employees may not use their personal devices for work purposes outside of their normal work schedule without authorization in advance from management. This includes, but is not limited to, receiving, sending and responding to emails or text messages, responding to calls or making calls. In the event that such advance authorization is given, non-exempt employees must track all time worked on their personal device outside of normal work hours.

All employees are prohibited from using their personal device for work purposes during a leave of absence, whether paid or unpaid, without advance approval from ECRM. ECRM reserves the right to deactivate ECRM applications and access to its network on an employee's personal device during leave.

ECRM reserves the right to review, retain or release company-related information contained on a personal device to governmental agencies during an investigation or litigation. In the event there is such an investigation or litigation, employees may not alter or destroy any company-related information and will turn the device over to ECRM for discovery purposes for a brief amount of time so that the data can be copied and produced to the governmental or investigating agency.

Employees will receive an agreed upon monthly stipend to use personal devices based upon their employment position with ECRM. If the employee has a plan that exceeds the monthly stipend, ECRM will not be liable for the cost difference.

Employees whose job requires driving, either occasionally or regularly, are not permitted to use their device while driving.

ECRM reserves the right to deactivate any of its applications or access to its network from personal devices without notice to employees.

ECRM is not responsible for any damage to personal devices, including those caused by ECRM applications or access to its network. ECRM is also not responsible for the costs associated with repair or replacement of personal devices.

Employees must notify ECRM within 24 hours if a personal device is lost or stolen. In that event, the employee agrees to immediately deactivate the phone with the service carrier. ECRM will also disable all ECRM applications and access to its network. Any damage to a personal device caused by its loss, theft, deactivation of ECRM applications and/or access to its network is the sole responsibility of the employee.

Employees who violate this policy may be subjected to discipline up to and including termination of employment.

All work-related information stored on personal devices, including applications, emails, Outlook calendars and network-related information, is the property of ECRM. Upon termination of employment, whether voluntary or involuntary, the employee agrees to produce the device for inspection and permit ECRM to disable and remove all ECRM applications, as well as any other company-related information, from their personal device. Access to the ECRM network will also be disabled.

4.15 Use of Social Media

At ECRM, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers but social media usage can impact and/or have repercussions for the company any time the company is referenced, discussed, referred to, or commented upon in social media.

Social media can be many things but it includes all means of communicating through the internet on blogs, Twitter, Facebook, MySpace, LinkedIn, or photo or video sharing through Flickr or YouTube. Posting comments on other sites or forums includes, but is not limited to, the publishing, commenting, tagging or otherwise communicating in any manner through such technologies or websites.

When using social media, whether at work or outside of work (during personal time) all ECRM employees should adhere to the following guidelines:

1. Always be respectful, fair and courteous to fellow employees, customers or suppliers. If you decide to post complaints or criticism, avoid using any statements that could be viewed as malicious, threatening, obscene, intimidating, defamatory or harassing. For more information see our Anti-harassment policy.
2. The company strives to anticipate and manage crisis situations in order to reduce disruption to our employees and to maintain our reputation as a high quality company. To best serve these objectives, the company will respond to the news media in a timely and professional manner only through the designated spokespersons.
3. Employees may not share the company's confidential or proprietary information. For more information see our Confidential Information policy.
4. Make it clear in your social media activity that you are speaking on your own behalf.

5. Use good judgment about what you post and remember that anything you say can reflect on ECRM. In addition, remember that your statements have the potential to result in liability for you or ECRM.
6. Any statements made about the Company and any of its employees must also be truthful and accurate.
7. Use should not violate any applicable law.

Carefully read these guidelines as they are intended to cover all social media related activities. Employees will be held responsible for what they write in social media and should use discretion and sound judgment in discussions of any work-related matters. If an employee's posting violates any of these guidelines the company may take action against the employee (up to and including termination) based on such postings.

This policy is not intended to restrict communications or actions protected or required by state or federal law. Any employee who has questions or doubts about the appropriateness of Social Media usage should speak with Human Resources.

4.16 Personnel Records and Administration

Employees may review their personnel files in accordance with applicable state law.

4.17 Personal Data Changes

It is important that the Company have certain personal information about you in our records. You need to tell us as soon as there is a change to your mailing address, telephone numbers, marital status, dependents' information, educational accomplishments, and other possibly related information. We also need to have information about who to contact in case of an emergency. To change your personal information, contact the Human Resources department.

4.18 Disciplinary Policy

This policy applies to all employees who have completed their 90-day introductory period. Typically, the process involves the four steps indicated below which will be applied in an attempt to resolve unacceptable conduct, poor performance, attendance concerns and/or any other infraction of workplace policies, rules and/or procedures (hereinafter referred to collectively as a "violation"):

- Verbal Warning (documented) --- The employee is informed of the violation by the supervisor and told what constitutes proper conduct. The purpose of a verbal warning is to make certain the employee is fully aware of the violation and the company's expectations so that the potential for future violations may be eliminated.
- Written Warning --- The employee receives a written warning following a violation. The purpose of a written warning is to make certain the employee understands the severity of

the situation and that further misconduct will most likely result in suspension or discharge.

- Suspension and/or Final Written Warning --- A suspension without pay of up to five days and/or a final written warning is used to address continuing problems where previous action has been ineffective or following a more serious violation. The purpose of the suspension is to make certain the employee understands the seriousness of the situation and that any other violation could lead to termination.
- Termination --- The employee is discharged as the result of a serious violation or the final step in the discipline process.

Each step of the process will be documented and will become part of the employee's personnel file. The Company reserves the right to determine the appropriate level of discipline based upon the particular circumstances and severity of the matter and may move to any level in the discipline process as it deems appropriate. In addition, some incidents, including, but not limited to, theft, violations of the Company's anti-harassment policies, falsification of time cards and threats or acts of violence may be grounds for immediate discharge.



5 SAFETY IN THE WORKPLACE

The safety and health of employees is top priority. East Coast Risk Management strives to provide a clean, hazard-free, and safe environment in accordance with the Occupational Safety and Health Act of 1970.

5.1 General Safety Rules

As an employee, you are expected to take part in maintaining a safe environment. You should observe all posted safety rules, adhere to all safety instructions provided by your supervisor, and use safety equipment when required. It is your responsibility to learn the location of all safety and emergency equipment, as well as the safety and/or emergency phone numbers. Each employee is expected to exercise caution and common sense in all work activities.

Any problems with Company-provided safety equipment should be reported to your immediate supervisor. If it is not safe to work for any reason, report the problem to your supervisor immediately.

5.2 Zero Tolerance for Violence

Violence is strictly prohibited in the workplace.

Prohibited conduct includes, but is not limited to:

- Injuring another person physically;
- Engaging in behavior that creates a reasonable fear of injury to another person;
- Engaging in behavior that subjects another individual to extreme emotional distress;
- Possessing or using a weapon including, but not limited to, guns, swords or knives with blades over four inches in length, explosives, and any chemical whose purpose is to cause harm to another person. Regardless of whether an employee possesses a concealed weapons permit or is allowed by law to possess a weapon, weapons are prohibited on any company property;
- Intentionally damaging property;
- Threatening to injure an individual or to damage property; and
- Retaliating against any employee who, in good faith, reports a violation of this policy.

This list is illustrative only and not exhaustive. No form of workplace violence will be tolerated. Employees who violate this policy will be subject to disciplinary action, up to and including termination. If you feel that you are a victim of workplace violence or suspect or witness an act of violence, you must report it immediately to your supervisor.

5.3 Inspection of Property

Packages or bags you carry into or out of work may be inspected by management if we have a reasonable suspicion that a violation of a company policy has occurred. You are discouraged from bringing large or valuable personal items to work. The company is not responsible for any loss or theft of personal items.

As part of a company investigation of possible violations of a policy, it may be necessary for work areas, lockers, desks or cabinets to be searched on occasion. These are the property of the company and, as such, we reserve the right to search them with or without advance notice. You should have no expectation of privacy.

5.4 First Aid

In the event of a life threatening emergency, call 911. If an accident or illness should occur, no matter how slight, notify your manager or supervisor immediately so that appropriate medical treatment can be administered. In order to avoid exposure to pathogens that may be present in blood or body fluids, it is imperative that employees take extreme care in case of an accident, both on and off the job. Use caution to avoid contact with any body fluid (blood, saliva, urine, etc.). Each first aid kit contains plastic gloves. Please be sure to use them. If this is not possible, use a strong disinfectant, to clean up afterwards.

On-the-job injuries will be handled in accordance with Workers' Compensation laws. Any employee who is injured while on the job must notify their supervisor immediately. As part of our Drug and Alcohol policy, you may also be required to submit to drug testing if you are injured on the job.

5.5 Fitness for Duty

All employees are expected to be physically and mentally fit to perform their jobs in a safe manner at all times, with or without a reasonable accommodation. If you are not able to perform your job safely for any reason, you are to inform you supervisor immediately.



6 LEAVING THE COMPANY

We hope that you will enjoy ongoing success and satisfaction as an employee of East Coast Risk Management. However, this section outlines what to expect if you leave the company.

6.1 Termination of Employment

At ECRM, we strive to hire the best employees. It takes the organization time to review applications, interview candidates and to identify the best applicants for the job. Employees desiring to terminate their employment relationship with ECRM are expected to notify the Company at least three weeks in advance of their intended termination. Such notice should be given in writing to the employee's supervisor and the Human Resources department. Not providing at least three weeks written notice will result in the employee forfeiting payout of unused, accrued PTO to which s/he may have been entitled pursuant to the PTO policy in this handbook.

6.2 Return of Company Property

Any ECRM property issued to employees, such as computer equipment, keys, or company credit card, must be returned to the Company on or before the last day of work. Once all property is returned, the final paycheck will be processed with the next pay cycle. Employees will be responsible for any lost or damaged items.



Employee Policies Acknowledgment

I acknowledge that I have received a copy of the East Coast Risk Management Employment Policies, and I understand that it is my responsibility to read and follow these policies.

I am aware that if, at any time, I have questions regarding East Coast Risk Management company policies I should direct them to my manager or the Human Resources department.

I understand that neither this Handbook nor any other communication by a management representative or any other employee, whether oral or written, is intended in any way to create a contract of employment. I understand that, unless I have a written employment agreement signed by an authorized ECRM representative, I am employed at will and this policy does not modify my at-will employment status. If I have a written employment agreement signed by an authorized ECRM representative and this Handbook conflicts with the terms of my employment agreement, I understand that the terms of my employment agreement will control.

I also am aware that East Coast Risk Management, at any time, with or without notice, change, add to, or delete from the provisions of the company policies.

I also understand that this version of the Handbook supersedes all prior versions published or distributed by ECRM.

Employee's Printed Name

Employee's Signature

Date



Team Commitments

Foster Relationships.

Our company is built on strong relationships which require absolute trust, a shared direction, open communication and deep commitment. Instill trust and confidence in those you work with and for.

Be Proactive.

We do not just “punch the clock.” Each day we seek new opportunities to add value to the company and our clients.

Use honest, direct and thoughtful communication.

Strong communication skills are the backbone of our customer-service focus. Make sure to listen as much as you speak. Focus on empowering coworkers and customers, not on controlling the conversation.

Be Accountable.

Take responsibility for your actions and quality of work. We believe that no one is more responsible for our performance than ourselves.

Be Professional.

We present ourselves in our manners, actions and appearance, so make others feel comfortable and respected.

Be Adaptable.

Our customers and clients span across a diverse range of industries, cultures and geography. As we value the uniqueness of each individual, we create more engaged and efficient teams.

Be Creative.

We value new ideas, encourage innovative thinking and embrace change. We foster an entrepreneurial spirit and are open-minded to any suggestion or idea that increases the quality and value of our services.

Be Fully Committed.

We focus on cooperation, not competition. As a team member, we are each committed to the shared mission of East Coast Risk Management and to holding one another accountable to it.

Celebrate Successes.

Our greatest successes occur when we come together and work as a cohesive team.

I have read and agree to uphold the East Coast Risk Management Team Commitments.

Print Name

Date

Signature