

MAP Retirement, Inc. Employee Handbook

MAP Retirement, Inc. is delighted to have you on our team! We hope you will take advantage of opportunities to enhance your career and further MAP Retirement's goals.

The MAP organization has a reputation for outstanding leadership, innovation, and expertise. Our employees use their creativity and talent to invent new solutions, meet new demands, and offer the most effective services/products in the industry. With your active involvement, creativity, and support, MAP Retirement will continue to achieve its goals. We believe that each employee contributes directly to MAP Retirement's growth and success, and we hope you will take pride in being a member of our team.

This handbook was developed to describe some of the expectations of our employees and to outline the policies, programs, and benefits available to eligible employees. Employees should familiarize themselves with the contents of the employee handbook as soon as possible, for it will answer many questions about employment with MAP Retirement. If you have questions, feel free to ask your supervisor or contact the Human Resources (HR) department.

No employee handbook can anticipate every circumstance or question about policy. As MAP Retirement continues to grow, the need may arise and MAP Retirement reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion. The only exception to any changes is our employment-at-will policy permitting you or MAP Retirement to end our relationship for any reason at any time. Employees will, of course, be notified of such changes to the handbook as they occur.

We hope that your experience here will be challenging, enjoyable, and rewarding.

Sincerely Managing Partners

Chad Carroll

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Robert Carroll

Matt Reimer

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# **101 Nature of Employment**

Employment with MAP Retirement (MAP) is voluntarily entered, and the employee is free to resign at will at any time, with or without cause. Similarly, MAP may terminate the employment relationship at will at any time, with or without notice or cause, so long as there is no violation of applicable federal or state law.

Policies set forth in this handbook are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between MAP and any of its employees. The provisions of the handbook have been developed at the discretion of management and, except for its policy of employment-at-will, may be amended or cancelled at any time, at MAP's sole discretion.

These provisions supersede all existing policies and practices and may not be amended or added to without the express written approval of the Managing Partners of MAP. The provisions of this document apply to all employees in its entirety even if a separate employment agreement has been entered into between MAP and said employee.

Any salary figures provided to an employee in annual or monthly terms are stated for the sake of convenience or to facilitate comparisons and are not intended to and do not create an employment contract for any specific period.

Nothing in this statement is intended to interfere with, restrain, or prevent concerted activity as protected by the National Labor Relations Act (NLRA). Such activity includes employee communications regarding wages, hours, or other terms or conditions of employment. **MAP Retirement** employees have the right to engage in or refrain from such activities.

# **102** Employee Relations

MAP believes that the work conditions, wages, and benefits it offers to its employees are competitive with those offered by other employers in this industry. If employees have concerns about work conditions or compensation, they are strongly encouraged to voice these concerns openly and directly to their supervisors.

Our experience has shown that when employees deal openly and directly with supervisors, the work environment can be excellent, communications can be clear, and attitudes can be positive. We believe that MAP amply demonstrates its commitment to employees by responding effectively to employee concerns.

## **103 Employee Privacy**

It is MAP Retirement's goal to respect the individual privacy of its employees and at the same time maintain a safe and secure workplace. When issues of safety and security arise, you may be requested to cooperate with an investigation. The investigation may include the following procedures to safeguard the company and its employees: searches of personal belongings, searches of work areas, searches of private vehicles on company premises, medical examinations, and the like. Failure to cooperate with an investigation is grounds for termination. Providing false information during any investigation may lead to discipline, including termination.

Employees are expected to make use of company facilities only for the business purposes of the company. Accordingly, materials that appear on company hardware or networks are presumed to be for business purposes, and all such materials are subject to review by the company at any time without notice to the employees. Employees do not have to have any expectation of privacy with respect to any material on company property. **MAP Retirement** regularly monitors its communications systems and networks as allowed by law. Monitored activity may include voice, e-mail, and text communications, as well as Internet search and browsing history. Employees who make excessive use of the communications system for personal matters are subject to discipline. Employees are expected to keep personal communication to a minimum and to emergency situations.

**Video surveillance.** As part of its security measures and to help ensure a safe workplace, **MAP Retirement** has positioned video cameras to monitor various areas of its facilities. Video cameras will not be used in private areas, such as break rooms, restrooms, locker/dressing rooms, etc. Videotapes will not include an audio component.

## **Privacy—Social Security Numbers**

#### Policy and Procedure Regarding Use and Disclosure of Social Security Numbers

**Purpose.** This policy and procedure explain MAP Retirement's general standards and practices for how Social Security numbers are gathered, stored, disclosed, and ultimately disposed of.

**Policy.** It is MAP Retirement's policy that Social Security numbers obtained from employees, vendors, contractors, customers, or others are confidential information.

Social Security numbers will be obtained, retained, used, and disposed of only for legitimate business reasons and in accordance with the law and this policy.

**Procedure.** Documents or other records containing employee Social Security numbers generally will be requested, obtained, or created only for legitimate business reasons consistent with this policy. For example, Social Security numbers may be requested from employees for tax reporting purposes (i.e., Internal Revenue Service (IRS) Form W-4), for new hire reporting, or for purposes of enrollment in the company's employee benefit plans.

**Retention and access to Social Security numbers.** All records containing Social Security numbers (whether partial or complete) will be maintained in secure, confidential files with limited access.

**Unauthorized use/disclosure of Social Security numbers.** Any employee who obtains, uses, or discloses Social Security numbers for unauthorized purposes or contrary to the requirements of this policy and procedure may be disciplined, up to and including discharge. The company will cooperate with government investigations of any person alleged to have obtained, used, or disclosed Social Security numbers for unlawful purposes.

# **104 Equal Employment Opportunity**

**MAP Retirement** provides equal employment opportunities to all employees and applicants for employment without regard to race, color, creed, ancestry, national origin, citizenship, sex or gender (including pregnancy, childbirth, and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, religion, age, disability, genetic information, service in the military, or any other characteristic protected by applicable federal, state, or local laws and ordinances. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

**MAP Retirement** expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is not tolerated.

**MAP Retirement** will endeavor to make a reasonable accommodation of an otherwise qualified applicant or employee related to an individual's physical or mental disability, sincerely held religious beliefs and practices, and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon MAP Retirement's business operations.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of Human Resources department. The company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. Employees who feel they have been subjected to any such retaliation should bring it to the attention of Human Resources.

Retaliation means adverse conduct taken because an individual reported an actual or a perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to:

(1) Shunning and avoiding an individual who reports harassment, discrimination, or retaliation.

(2) Express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination, or retaliation; or

(3) Denying employment benefits because an applicant or employee reported harassment, discrimination, or retaliation or participated in the reporting and investigation process.

Other examples of retaliation include firing, demotion, denial of promotion, unjustified negative evaluations, increased surveillance, harassment, and assault.

## **105 Business Ethics and Conduct**

The successful business operation and reputation of MAP is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of MAP is dependent upon our customers' trust, and we are dedicated to preserving that trust. Employees owe a duty to MAP, its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public.

MAP will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor and, if necessary, with Human Resources for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of every MAP employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

# 106 Conflicts of Interest & Confidentiality

## **Conflicts of Interest**

**MAP Retirement** expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical conduct and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

Exactly what constitutes a conflict of interest, or an unethical business practice is both a moral and a legal question. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of MAP's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

**MAP Retirement** recognizes and respects the individual employee's right to engage in activities outside of employment that are private in nature and do not in any way conflict with or reflect poorly on the company.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises in which there is a potential conflict of interest, the employee should discuss this with a manager for advice and guidance on how to proceed. The list below suggests some of the types of activities that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

- 1. Simultaneous employment by another firm that is a competitor of or supplier to MAP Retirement.
- 2. Carrying on company business with a firm in which the employee, or a close relative of the employee has a substantial ownership or interest.
- 3. Holding a substantial interest in, or participating in the management of, a firm to which the company makes sales or from which it makes purchases.
- 4. Borrowing money from customers or firms, other than recognized loan institutions, from which our company buys services, materials, equipment, or supplies.
- 5. Accepting substantial gifts or excessive entertainment from an outside organization or agency.
- 6. Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
- 7. Participating in civic or professional organization activities in a manner that divulges confidential company information.
- 8. Misusing privileged information or revealing confidential data to outsiders.
- 9. Using one's position in the company or knowledge of its affairs for personal gains; Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which MAP does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving MAP.
- 10. Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.

## Confidentiality

The protection of confidential business information and trade secrets is vital to the interests and success of MAP Retirement. Confidential information is all information disclosed to or known by you because of employment with the company that is not generally known to people outside the company about its business.

An employee who improperly uses or discloses trade secrets or confidential business information will be subject to disciplinary action up to and including termination of employment and legal action, even if the employee does not actually benefit from the disclosed information.

All inquiries from the media must be referred to a Managing Partner. This provision is not intended to, and should not be interpreted to, prohibit employees from discussing wages and other terms and conditions of employment if they so choose.

# **107 Outside Employment**

An employee may hold a job with another organization as long as he or she satisfactorily performs his or her job responsibilities with MAP. All outside jobs or employment in any regards with any other organization must be disclosed and approved by a Human Resources department before accepting or performing job responsibilities for another organization. All employees will be judged by the same performance standards and will be subject to MAP's scheduling demands, regardless of any existing outside work requirements.

If MAP determines that an employee's outside work interferes with performance or the ability to meet the requirements of MAP as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with MAP. Working for any other administrative, compliance, financial advisory, accounting, or actuarial organization will not be permitted.

Employees with a second job are expected to work their assigned schedules. A second job 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. In addition, employees who have accepted outside employment may not use PTO - sick time to work on the outside job.

If outside work activity causes or contributes to job-related problems, it must be discontinued, or the employee may be subject to disciplinary action up to and including termination.

## **108 Non-Disclosure**

The protection of confidential business information and trade secrets is vital to the interests and the success of MAP Such confidential information includes, but is not limited to, the following examples:

- Compensation data
- Computer programs and codes
- Customer lists
- Customer preferences and pricing
- Financial information
- Marketing strategies
- Pending projects and proposals
- Proprietary production processes
- Research and development strategies

All employees are required to sign a non-disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

# 109 Americans with Disabilities Act (ADA) and Reasonable Accommodation

MAP Retirement is committed to the fair and equal employment of individuals with disabilities under the ADA. It is MAP Retirement's policy to provide reasonable accommodation to qualified individuals with disabilities unless the accommodation would impose an undue hardship on the company. MAP Retirement prohibits any harassment of, or discriminatory treatment of, employees or applicants based on a disability or because an employee has requested a reasonable accommodation.

In accordance with the ADA, 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. An employee or applicant with a disability may request an accommodation from the HR department and should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. The company then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made, or if any other possible accommodations are appropriate. If requested, the employee is responsible for providing medical documentation regarding the disability and possible accommodations. All information obtained concerning the medical condition or history of an applicant or employee will be treated as confidential information, maintained in separate medical files, and disclosed only as permitted by law.

It is the policy of MAP Retirement to prohibit harassment or discrimination based on disability or because an employee has requested a reasonable accommodation. MAP Retirement prohibits retaliation against employees for exercising their rights under the ADA or other applicable civil rights laws

# **110 Commitment to Diversity**

MAP Retirement is committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is embodied in company policy and the way we do business at MAP Retirement and is an important principle of sound business management.

# **201 Employment Categories**

It is the intent of MAP to clarify the definitions of employment classifications so that employees understand their employment status and benefit eligibility.

Each employee is designated as either NONEXEMPT or EXEMPT from federal and state wage and hour laws. NONEXEMPT employees are entitled to overtime pay under the specific provisions of federal and state laws. EXEMPT employees are excluded from specific provisions of federal and state wage and hour laws. An employee's EXEMPT or NONEXEMPT classification may be changed only upon written notification by MAP management.

In addition to the above categories, each employee will belong to one other employment category:

REGULAR FULL-TIME employees are those who are not in a temporary or introductory status and who are regularly scheduled to work MAP's full-time schedule. Generally, they are eligible for MAP's benefit package, subject to the terms, conditions, and limitations of each benefit program.

REGULAR PART-TIME employees are those who are not assigned to a temporary or introductory status and who are regularly scheduled to work less than the full-time work schedule. Regular part-time employees are eligible for some benefits sponsored by MAP, subject to the terms, conditions, and limitations of each benefit program.

INTRODUCTORY employees are those whose performance is being evaluated to determine whether further employment in a specific position or with MAP is appropriate. Employees who satisfactorily complete the introductory period will be notified of their new employment classification. The introductory period is 60 (sixty) calendar days.

TEMPORARY employees are those who are hired as interim replacements, to temporarily supplement the work force, or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status unless and until notified of a change. All legally mandated benefits (such as Social Security and workers' compensation insurance) are provided to temporary employees. Some other MAP-sponsored benefits may also be available, subject to the terms, conditions, and limitations of each benefit program.

# **202 Introductory Period**

The introductory period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. MAP uses this period to evaluate employee capabilities, work habits, and overall performance. Either the employee or MAP may end the employment relationship at will at any time during or after the introductory period, with or without cause or advance notice.

All new and rehired employees work on an introductory basis for the first 60 calendar days after their date of hire. Any significant absence will automatically extend an introductory period by the length of the absence. If MAP determines that the designated introductory period does not allow sufficient time to thoroughly evaluate the employee's performance, the introductory period may be extended for a specified period.

Upon satisfactory completion of the introductory period, employees enter the "regular" employment classification.

During the introductory period, new employees are eligible for those benefits that are required by law, such as workers' compensation insurance and Social Security. After becoming regular employees, they may also be eligible for other MAP provided benefits, subject to the terms and conditions of each benefits program. Employees should read the information for each specific benefits program for the details on eligibility requirements

# 203 Workweek and Hours of Work

MAP provides a flexible workweek from Monday – Friday, between the hours 7:00 am - 7:00 pm generally consists of 8 hours each day, 40 hours a week, with a 30-minute lunch break. MAP standard core hours are 9:00 am - 5:30 pm Individual work schedules may vary depending on the needs of each department.

## **204 Access to Personnel Files**

MAP's Human Resources Department maintains a personnel file on each employee and are considered confidential. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

Personnel files are the property of MAP, and access to the information they contain is restricted. Managers and supervisors may only have access to personnel file information who have a legitimate reason to review information in a file are allowed to do so.

Employees may inspect their own personnel files and may copy them but may not remove documents from their file. Inspections by employees must be requested in writing to the Human Resources department with reasonable advance notice and will be scheduled at a mutually convenient time or as required under state law. Personnel files are to be reviewed with a member of the Huma Resources department. Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information.

## **205 Employment of Relatives and Domestic Partners**

Relatives and domestic partners may be hired by the company if (1) the persons concerned will not work in a direct supervisory relationship, and (2) the employment will not pose difficulties for supervision, security, safety, or morale. For the purposes of this policy, "relatives" are defined as spouses, children, siblings, parents, or grandparents. A "domestic partnership" is generally defined as a committed relationship between two individuals who are sharing a home or living arrangements.

Current employees who marry each other or become involved in a domestic partnership will be permitted to continue employment with the company provided they don't work in a direct supervisory relationship with each other or otherwise pose difficulties as mentioned above. If employees who marry or live together do work in a direct supervisory relationship with each other, the company will attempt to reassign one of the employees to another position for which the employee is qualified if such a position is available. If no such position is available, the employees will be permitted to determine which one of them will resign from the company.

## **206 Job Performance**

Communication between employees and supervisors or managers is very important. Discussions regarding job performance are ongoing and often informal. A verbal performance evaluation will be conducted at the end of an employee's initial period of hire, known as the introductory period. Employees should initiate conversations with their supervisors if they feel additional ongoing feedback is needed. Generally, formal performance reviews are conducted bi-annually. These reviews include a written performance appraisal and discussion between the employee and the supervisor about job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals and expectations for the coming year.

## 207 Personal Data Changes

It is the responsibility of each employee to promptly notify MAP of any changes in personal data. Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of an emergency, educational accomplishments, and other such status reports should be accurate and current at all times. If any personnel data has changed, notify human resources.

# **208 Employment Applications**

MAP relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in the exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

## **209 Employment Reference Checks**

To ensure that individuals who join MAP are well qualified and have a strong potential to be productive and successful, it is the policy of MAP to check the employment references of all applicants.

MAP will respond to all reference check inquiries from other employers. Responses to such inquiries will confirm only dates of employment and position(s) held. No employment data will be released without a written authorization and release signed by the individual who is the subject of the inquiry.

# 210 Workplace Guidelines

## Attendance

All employees are expected to arrive on time, ready to work, every day they are scheduled to work.

If unable to arrive at work on time, or if an employee will be absent for an entire day, the employee must contact the supervisor on their designated MAP phoneline as soon as possible. During certain circumstances and have exhausted trying to reach out to respective supervisor a voicemail or e-mail message are acceptable.

Excessive absenteeism or tardiness will result in discipline up to and including termination. Failure to show up or call in for a scheduled shift without prior approval also may result in discipline up to and including termination. If an employee fails to report to work or call in to inform the supervisor of the absence for 3 consecutive days or more, the employee will be considered to have voluntarily resigned employment.

## **Dress and Grooming**

**MAP Retirement** provides a casual yet professional work environment for its employees. Even though the dress code is casual, it is important to project a professional image to our customers, visitors, and coworkers. All employees are expected to dress in a manner consistent with good hygiene, safety, and good taste. Please use common sense.

Certain employees may be required to meet special dress and grooming, such as business attire, depending on the nature of their job. Any questions or complaints regarding the appropriateness of attire should be directed to the Human Resource department. Decisions regarding attire will be made by the HR department and not by individual departments or managers.

## Social Media Acceptable Use

**MAP Retirement** encourages employees to share information with coworkers and with those outside the company for the purposes of gathering information, generating new ideas, and learning from the work of others. Social media provides inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public, and therefore, the company has established the following guidelines for employee participation in social media.

*Note:* As used in this policy, "social media" refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, Instagram, and Snapchat, among others.

**Off-duty use of social media.** Employees may maintain personal websites or weblogs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas. In addition, employees may not post on a personal blog or webpage or participate on a social networking platform for personal purposes during work time or at any time with **MAP Retirement** equipment or property.

**On-duty use of social media.** Employees may engage in social media activity during work time provided it is directly related to their work and approved by their manager and does not identify or reference company clients, customers, or vendors without express permission. The company monitors employee use of company computers and the Internet, including employee blogging and social networking activity.

**Respect.** Demonstrate respect for the dignity of the company, its owners, its customers, its vendors, and its employees. A social media site is a public place, and employees should avoid inappropriate comments. For example, employees should not divulge **MAP Retirement** confidential information such as trade secrets, client lists, or information restricted from disclosure by law on social media sites. Similarly, employees should not engage in harassing or discriminatory behavior that targets other employees or individuals because of their protected class status or make defamatory comments or engage in other behavior that violates the company's policies.

**Post disclaimers.** Employees who identify themselves as company employees or discuss matters related to the company on a social media site must include a disclaimer on the front page stating that it does not express the views of the company and that the employees are expressing only personal views—for example: "The views expressed on this website/Weblog are mine alone and do not necessarily reflect the views of my employer." Place the disclaimer in a prominent position and repeat it for each posting expressing an opinion related to the company or the company's business. Employees must keep in mind that if they post information on a social media site that is in violation of company policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action.

**Competition.** Employees should not use social media to criticize the company's competition and should not use it to compete with the company.

**Confidentiality.** Do not identify or reference company clients, customers, or vendors without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

**New ideas.** Please remember that new ideas related to work, or the company's business belong to the company. Do not post them on a social media site without the company's permission.

**Trademarks and copyrights.** Do not use the company's or others' trademarks on a social media site or reproduce the company's or others' material without first obtaining permission.

Avoid statements about the company's future. Writing about projected growth, sales and profits, future products or services, marketing plans, or the stock price may violate Securities and Exchange Commission (SEC) rules or other applicable laws.

**Legal.** Employees are expected to comply with all applicable laws, including, but not limited to, Federal Trade Commission (FTC) guidelines and copyright, trademark, and harassment laws.

**Company restrictions.** It may require that employees temporarily confine social media commentary to topics unrelated to the company or that employees temporarily suspend such activity to ensure compliance with the SEC's regulations or other laws. The company may also require employees to delete references to it on a website or Web log and to stop identifying themselves as employees of the company.

**Discipline.** Violations of this policy may result in discipline up to and including immediate termination of employment.

Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the NLRA to engage in protected concerted activities with other employees to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits. Employees have the right to engage in or refrain from such activities.

#### **Bulletin Boards**

All required governmental postings are posted on the boards located on the MAP Employee Intranet site. The Employee Intranet site may also contain general announcements. Employees may submit to HR notices of general interest, such as Industry webinars, trainings; recreational-type announcements and/or club functions (e-mail should not be used for the aforementioned) HR approves, posts, and takes down all notices. The company reserves the right to refuse permission to post or to take down any announcement.

Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the NLRA to engage in protected concerted activities with other employees to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits. Employees have the right to engage in or refrain from such activities.

## Solicitation

Employees should be able to work in an environment that is free from unnecessary annoyances and interference with their work. To protect our employees and visitors, solicitation by employees is strictly prohibited while either the employee being solicited or the employee doing the soliciting is on "working time." "Working time" is defined as time during which an employee is not at a meal, on break, or on the premises immediately before or after a shift.

Employees are also prohibited from distributing written materials, handbills, or any other type of literature on working time and, always, in "working areas," which include all office areas. "Working areas" do not include break rooms, parking lots, or common areas shared by employees during nonworking time. Nonemployees may not trespass or solicit or distribute materials anywhere on company property at any time.

Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the NLRA to engage in protected concerted activities with other employees to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits. Employees have the right to engage in or refrain from such activities.

# 211 Cyber Security

## **Policy brief & purpose**

Our company cyber security policy outlines our guidelines and provisions for preserving the security of our data and technology infrastructure.

The more we rely on technology to collect, store and manage information, the more vulnerable we become to severe security breaches. Human errors, hacker attacks and system malfunctions could cause great financial damage and may jeopardize our company's reputation.

For this reason, we have implemented a number of security measures. We have also prepared instructions that may help mitigate security risks. We have outlined both provisions in this policy.

## Scope

This policy applies to all our employees, contractors, volunteers, and anyone who has permanent or temporary access to our systems and hardware.

## Policy elements Confidential data

- Confidential data is secret and valuable. Common examples are:
- Unpublished financial information
- Data of customers/partners/vendors
- Patents, formulas, or new technologies
- Customer lists (existing and prospective)
- Advisor lists (existing and prospective)

All employees are obliged to protect this data. In this policy, we will give our employees instructions on how to avoid security breaches.

#### Protect personal and company devices

When employees use their digital devices to access company emails or accounts, they introduce security risk to our data. We advise our employees to keep both their personal and company-issued computer, tablet and cell phone secure. They can do this if they:

- Keep all devices password protected.
- Accept and install software upgrades when requested by MAP
- Ensure they do not leave their devices exposed or unattended.
- Install security updates of browsers and systems monthly or as soon as updates are available.
- Log into company accounts and systems through secure and private networks only.
- We also advise our employees to avoid accessing internal systems and accounts from other people's devices or lending their own devices to others.

They should follow instructions to protect their devices and refer to our *Security Specialists/ Network Engineers* at Apollo Blue support@apolloblue.com if they have any questions.

## Keep emails safe

Emails often host scams and malicious software (e.g., worms.) To avoid virus infection or data theft, we instruct employees to:

- Avoid opening attachments and clicking on links when the content is not adequately explained (e.g. "watch this video, it's amazing.")
- Be suspicious of clickbait titles (e.g., offering prizes, advice.)
- Check email and names of people they received a message from to ensure they are legitimate.
- Look for inconsistencies or giveaways (e.g., grammar mistakes, capital letters, excessive number of exclamation marks.)
- If an employee isn't sure that an email, they received is safe, they can refer to our [IT Specialist.]

## Manage passwords properly

Password leaks are dangerous since they can compromise our entire infrastructure. Not only should passwords be secure so they won't be easily hacked, but they should also remain secret. For this reason, we advise our employees to:

- Choose passwords with at least eight characters (including capital and lower-case letters, numbers, and symbols) and avoid information that can be easily guessed (e.g., birthdays.)
- Remember passwords instead of writing them down. If employees need to write their passwords, they are obliged to keep the paper or digital document confidential and destroy it when their work is done.
- Never exchange credentials. If an exchange of credentials is required, please contact your supervisor and <a href="mailto:support@apolloblue.com">support@apolloblue.com</a>.
- Change their passwords every two months.

## Transfer data securely

Transferring data introduces security risk. Employees must:

- Avoid transferring sensitive data (e.g., customer information, employee records) to other devices or accounts unless necessary.
- All emails with any personal or confidential information regarding a client, participant, employee, advisor, accountant, census, plan specific information, company specific information be sent only in an encrypted format via email or uploaded through the secure client portal.
- The use of outside transfer programs is prohibited, examples include but are not limited to Box, Mantra, Dropbox, Google Drive, icloud.
- Share confidential data over the company network/system and not over public Wi-Fi or private connection.
- Ensure that the recipients of the data are properly authorized people or organizations and have adequate security policies.
- Report scams, privacy breaches and hacking attempts
- Our *IT Specialists/ Network Engineers* Apollo Blue need to know about scams, breaches, and malware so they can better protect our infrastructure. For this reason, we advise our employees to report perceived attacks, suspicious emails, or phishing attempts as soon as possible to your supervisor and our specialists. Our must investigate promptly, resolve the issue, and send a companywide alert when necessary.

## **Additional measures**

To reduce the likelihood of security breaches, we also instruct our employees to:

- Turn off their screens and lock their devices when leaving their desks.
- Report stolen or damaged equipment as soon as possible to <u>HR@map401k.com</u>
- Change all account passwords at once when a device is stolen.
- Report a perceived threat or possible security weakness in company systems.
- Refrain from downloading suspicious, unauthorized, or illegal software on their company equipment.
- Avoid accessing suspicious websites.
- We also expect our employees to comply with our social media and internet usage policy.

Our Security Specialists/ Network Administrators: Apollo Blue should:

- Install firewalls, anti-malware software and access authentication systems.
- Inform employees regularly about new scam emails or viruses and ways to combat them.
- Investigate security breaches thoroughly.
- Follow this policies provisions as other employees do.
- Our company will have all physical and digital shields to protect information.

#### **Remote employees**

Remote employees must follow this policy's instructions too. Since they will be accessing our company's accounts and systems from a distance, they are obliged to follow all data encryption, protection standards and settings, and ensure their private network is secure.

We encourage employees to seek advice from our IT Specialists/ Network Engineers Apollo Bluesupport@apolloblue.com

# 212 Computers, Internet, E-Mail, and Other Resources

**MAP Retirement** provides a wide variety of communication tools and resources to employees for use in running day-to-day business activities. Whether it is the telephone, voicemail, scanner, Internet, intranet, e-mail, text messaging, portable electronic devices, or any other company-provided technology, use should be reserved for business-related matters during working hours. All communication using these tools should be handled in a professional and respectful manner.

Employees should not have any expectation of privacy in their use of company computer, phone, portable electronic devices, or other communication tools. All communications made using company-provided equipment or services, including e-mail and Internet activity, are subject to inspection by the company. Employees should keep in mind that even if they delete an e-mail, a voicemail, or another communication, a copy may be archived on the company's systems.

Employee use of company-provided communication systems, including personal e-mail and Internet use, that is not job-related has the potential to drain, rather than enhance, productivity and system performance. You should also be aware that information transmitted through e-email and the Internet is not completely secure or may contain viruses or malware, and information you transmit and receive could damage the company's systems, as well as the reputation and/or competitiveness of the company. To protect against possible problems, delete any e-mail messages before opening that are received from unknown senders and advertisers. It also is against company policy to turn off antivirus protection software or make unauthorized changes to system configurations installed on company computers. Violations of this policy may result in termination for a first offense.

The company encourages employees to use e-mail only to communicate with fellow employees, suppliers, customers, or potential customers regarding company business. Internal and external e-mails are considered business records and may be subject to federal and state recordkeeping requirements, as well as to discovery in the event of litigation. Be aware of this possibility when sending e-mails within and outside the company. All use of company-provided communications systems, including e-mail and Internet use, should conform to our company guidelines/policies, including but not limited to the Equal Opportunity, Harassment, Confidential Information, and Conflicts of Interest. So, for example, employees should not engage in harassing or discriminatory behavior that targets other employees or individuals because of their protected class status or make defamatory comments. Similarly, employees should not divulge confidential information such as trade secrets, client lists, or information restricted from disclosure by law on social media sites.

Because e-mail, telephone and voicemail, and Internet communication equipment are provided for company business purposes and are critical to the company's success, your communications may be accessed without further notice by IT department administrators and company management to ensure compliance with this guideline.

The electronic communication systems are not secure and may allow inadvertent disclosure, accidental transmission to third parties, etc. Sensitive information should not be sent via unsecured electronic means. Employees should pay particular care to the use and security of portable electronic devices when used for business-related purposes, such as laptops, tablets, smartphones, and other data storage media, whether provided by the employer or the employee. Lost or stolen portable electronic devices containing company information may cause breaches of security that result in the loss of company confidential commercial data, the loss of vital research data, the unauthorized disclosure of sensitive employee data, lawsuits against the individual, and lawsuits against the company. Employees should use appropriate password protections for such devices and physically secure them as recommended by IT department administrators.

Office telephones are for business purposes. While the company recognizes that some personal calls are necessary, these should be kept as brief as possible and to a minimum. Personal use of the company's cell phones, long-distance account, or toll-free numbers is strictly prohibited. Abuse of these privileges is subject to corrective action up to and including termination.

The company reserves the right to monitor customer calls to ensure employees abide by company quality guidelines and provide appropriate levels of customer service. Should the subject matter of any telephone conversation become personal while monitoring is taking place, monitoring of the call will immediately be discontinued.

Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the NLRA to engage in protected concerted activities with other employees to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits. Employees have the right to engage in or refrain from such activities.

## **Disciplinary Action**

We expect all our employees to always follow this policy and those who cause security breaches may face disciplinary action:

- First-time, unintentional, small-scale security breach: We may issue a verbal warning and train the employee on security.
- Intentional, repeated or a large-scale breach (which cause severe financial or other damage): We will invoke more severe disciplinary action up to and including termination. We will examine each incident on a case-by-case basis.
- Additionally, employees who are observed to disregard our security instructions will face progressive discipline, even if their behavior hasn't resulted in a security breach.

## Take security seriously

Everyone, from our customers and partners to our employees and contractors, should feel that their data is safe. The only way to gain their trust is to proactively protect our systems and databases. We can all contribute to this by being vigilant and keeping cyber security top of mind.

# **301 Employee Benefits**

Eligible employees at MAP are provided a wide range of benefits. A number of the programs (such as Social Security, workers' compensation, and unemployment insurance) cover all employees in the manner prescribed by law.

Benefits eligibility is dependent upon a variety of factors, including employee classification. Your supervisor can identify the programs for which you are eligible. Details of many of these programs can be found elsewhere in the employee handbook.

The following benefit programs are available to eligible employees:

- Holidays
- Paid time off (PTO)
- Health insurance
- Dental insurance
- Group term life insurance
- Long- and Short-Term Disability
- Long term care
- Cafeteria plan including AFLAC supplemental insurance
- 401(k) participation

Some benefit programs require contributions from the employee, and some are fully paid by MAP.

MAP will pay for company recommended training and professional certification as applicable to a specific employment position. However, if employment is terminated within a one-year period of any such training or certification, the employee will be responsible for reimbursing the full expense that was prepaid by the company. MAP Retirement does not pay for undergraduate or graduate degree tuition. Please see the pay deductions and setoffs section for further details.

## **302 Holidays**

MAP will grant holiday time off to all employees on the 8 holidays listed below and offers 3 additional floating holidays employees may use to observe other holidays recognized by local, state, federal governments, or religious organizations.

8 Holidays observed by all MAP Employees

- New Year's Day, January 1
- Dr. Martin Luther King Jr.
- Washington's Birthday
- Memorial Day
- Independence Day, July 4
- Labor Day
- Thanksgiving Day
- Christmas, December 25

MAP will grant 3 personal floating holidays. Personal floating holidays pertain to local, state, US Federal Holidays, personal religious holidays you choose to observe in addition to stated local, state, US Federal Holidays or are required by law. If local or state law requires a specific holiday to be recognized by MAP (employer) the floating holiday(s) day(s) will be applied to the specific legal recognized holiday by that local or state government. Additional holidays beyond the 8 recognized holidays and 3 floating holidays will not be granted.

Common Floating Holidays that may be observed at employee's choice or will be observed as required by law. (This does not represent all possible options and is not limited to)

- Patriots Day
- Good Friday
- Juneteenth National Independence Day, June 19th
- Victory Day
- Columbus Day / Indigenous Peoples Day
- Election Day
- Veterans' Day, November 19
- Other religious observances

Link for days recognized by US Federal Government. https://www.opm.gov/policy-data-oversight/pay-leave/federal-holidays/#url=Overview

MAP will grant paid holiday time off to all eligible employees in an eligible employment classification. Holiday pay will be calculated based on the employee's straight time pay rate (as of the date of the holiday) times the number of hours the employee would otherwise have worked on that day. Eligible employee classification(s):

- Regular full-time employees
- Regular part-time employees

If a holiday falls on a Saturday, for most Federal employees, the preceding Friday will be treated as a holiday for pay and leave purposes. (See 5 U.S.C. 6103(b).) If a holiday falls on a Sunday, for most Federal employees, the following Monday will be treated as a holiday for pay and leave purposes. (See Section 3(a) of Executive Order 11582, February 11, 1971.)

If a state holiday date conflicts or differs from the US Federal Holiday date the employee in the state may choose to observe either the state holiday date or the US Federal Holiday date, but not both. If the employee chooses to observe the state holiday date, that employee will work normal business hours on the US Federal Holiday date and inform their supervisor of their choice of dates to observe said holiday.

If a recognized holiday falls during an eligible employee's unscheduled or unpaid absence, the employee will be ineligible for holiday pay.

Paid time off for holidays will not be counted as hours worked for the purposes of determining overtime.

**Holiday pay.** Full-time regular employees are eligible for holiday pay. Hourly nonexempt employees become eligible after they have been actively with the company for 3 months. Exempt salaried employees may receive holiday pay immediately upon joining the company. Part-time and temporary employees, including summer employees, are not eligible for holiday pay.

Holiday pay shall be at the employee's regular straight-time rate, inclusive of shift premiums, times the employee's regularly scheduled hours (not to exceed 8 hours).

To receive holiday pay, an eligible nonexempt employee must be at work or taking an approved absence on the workdays immediately preceding and immediately following the day on which the holiday is observed. An approved absence is a day of paid vacation or paid sick leave. If an employee is absent on one or both days because of an illness or injury, the company may require verification of the reason for the absence before approving holiday pay.

# **303** Paid Personal Time Off (PTO)

MAP Retirement's PTO program is geared to provide you with the freedom to use your MAP allotted time off as you wish. PTO covers items like your vacation, sick time, paternity time, bereavement, family illness, and other personal time off you deem important, etc. PTO listed below is effective on January , 2023. PTO for employees prior to January 1, 2023, will be grandfathered based on the schedule when they were hired or in any employment agreement, not to exceed the current PTO policy in time or number of days. MAP Retirement reserves the right to change, amend or cancel the PTO policy at any time, in part or whole. The yearly amount of PTO will accrue on a bi-weekly basis throughout the year.

Up to 1 work week, five (5) days of PTO, is available to roll from one year to the next if it is accrued and unused. PTO is prorated for employees who work less than a standard 40-hour work week. One day of standard PTO is equal to 8 hours. As an example: If an eligible employee works a standard 30-hour week, one day of PTO is equal to 6 hours. PTO earning amount and eligible amount to roll from one year to the next will also be prorated for schedules less than 40 hours per week.

PTO accrued or unaccrued is not eligible for pay-out at termination or resignation as determined by state and federal law.

Eligible employee classification(s):

- Regular full-time employees
- Regular part-time employees

0-3 full years of employment with MAP completed as of Jan 1 = 18 days or 144 hours

- 4-9 full years of employment with MAP completed as of Jan 1 = 23 days or 184 hours
- > 9 full years of employment with MAP completed as of Jan 1 = 28 days or 224 hours

Accrual time example: Total PTO equals 23 days, or 184 hours (23 days \* 8 hours) you will accrue 0.8846 days or 7.077 hours of PTO per pay period. Working from January 1 to April 30, assuming you have had 8 full pay cycles 916 weeks) you will have accrued 7 full days of PTO, (8 pay cycles (16 weeks) \* 0.8846 = 7.077 days of accrued PTO, or 7.077 hours \* 8 days = 56.62 hours of accrued PTO).

23 (days) / 26 pay periods (in average year) = 0.8846 days per period. 184 hours / 26 pay periods (in average year) = 7.077 hours per period.

26 bi-weekly pay periods equal the number of pay periods in the average year. Cycles may vary with 25 or 27 biweekly periods in a year. Total PTO will not vary from year to year based on pay cycles.

Employees may request and take off PTO, some, or all, of the total PTO they expect to have in a calendar year before said PTO time may accrue during the bi-weekly pay cycle. If an employee terminates for any reason and has PTO that has been taken, but not accrued, said taken unaccrued PTO will be deducted from the employee's final paycheck. If the amount of taken unaccrued PTO is not fully recoverable by the employees' final paycheck the employees will reimburse MAP Retirement for the entire difference between taken paid PTO, unaccrued PTO and amount deducted from employee's final paycheck. The balance of PTO prepaid by MAP will be paid to MAP within 5 business days by previous employee.

All PTO greater than 2 days, must be requested at least two weeks in advance to ensure proper coverage. PTO less than two days should be requested as early as possible. The minimum PTO requested is .25 hours and should be requested in quarter hour increments. The maximum allowable recurring PTO request is up to two weeks in one occurrence. Employee are expected to utilize PTO throughout the entire year. Accumulating or not using PTO throughout the year could lead to PTO expiring and begin lost.

All requests are subject to management approval. PTO requests will be limited during seasonal busy times based on job duties.

Management retains the right not to grant vacations of two (2) or more consecutive days during peak time (February, March, April, July, September, October & December), depending on the employee's workload, where the employee is within goals to date, performance, and the availability of back up staff.

# No more than 5 days of PTO may be used in any of the following months without express written approval of two or more partners or a medical absence excused by physician's letter: February, March, April (1st to the day after the tax filing deadline, September), October, and December.

MAP employees understand the cyclicality of the retirement industry with filing, tax deadlines, plan implementation and transfer dates. Employees further understand the negative impact to MAP Retirement's organization, brand, clients, and advisor by taking PTO during demanding industry cycles. Employees will do their best to limit PTO around known demanding industry cycle times. If it is not possible to get prior approval as in the case of illness, notice must be given as soon as possible upon your return.

Employees are expected to coordinate with their backup to make sure someone is available to service advisors and clients.

No more than 50% of any department can take PTO at one time.

Managers have the right to designate when some or all of vacations must be taken. Vacation should be used in the year it is earned. Employees will be permitted to carry over up to 5 days of accrued vacation to the following calendar year. Unused vacation will be forfeited.

Employees whose employment terminates will not be paid for unused vacation time that has accrued during the calendar year of the termination.

# **304 Workers' Compensation Insurance**

MAP provides a comprehensive workers' compensation insurance program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses should inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

Neither MAP nor the insurance carrier will be liable for the payment of workers' compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by MAP.

# **305 Health Insurance**

MAP's health insurance plan provides employees and their dependents access to medical insurance benefits.

Eligible employees may participate in the health insurance plan subject to all terms and conditions of the agreement between MAP and the insurance carrier.

Details of the health insurance plan and information on cost of coverage will be provided in advance of enrollment to eligible employees.

# **401 Timekeeping**

Accurately recording time worked is the responsibility of every employee. Federal and state laws require MAP to keep an accurate record of time worked. Time worked, is all the time spent on the job performing assigned duties. All employees are required to take a 30-minute unpaid lunch break during a workday of at least 6 scheduled hours.

All employees should accurately record the time they begin and end their work, as well as the beginning and ending time of each meal period. They should also record the beginning and ending time of any split shift or departure from work for personal reasons. Overtime work must always be approved before it is performed.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

It is the employees' responsibility to verify their time records to certify the accuracy of all time recorded. The supervisor will review and then verify the time record before submitting if for payroll processing.

## **402** Paychecks

All employees are paid biweekly on every other Friday. Each paycheck will include earnings for all work performed through the end of the previous payroll period.

If a regularly scheduled payday falls on a day off such as a weekend or holiday, employees will be paid on the first day of work following the regularly scheduled payday. Paychecks are directly deposited into your checking and/or savings accounts.

## 403 Separation of Service

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are examples of some of the most common circumstances under which employment is terminated:

- Resignation voluntary employment termination initiated by an employee.
- Discharge involuntary employment termination initiated by the organization.

MAP will generally schedule exit interviews at the time of employment termination. The exit interview will afford an opportunity to discuss such issues as employee benefits, conversion privileges, repayment of outstanding debts to MAP, or return of MAP-owned property. Suggestions, complaints, and questions can also be voiced.

Since employment with MAP is based on mutual consent, both the employee and MAP have the right to terminate employment at will, with or without cause, at any time. Employee benefits will be affected by employment termination in the following manner. PTO is not an accrued or vested benefit eligible for pay-out at termination.

**Non-Disparagement.** During and after any employment with MAP Retirement (Company), regardless of how, when or why such employment ends, (a) you shall not make, either directly or by or through another person, any oral or written negative, disparaging or adverse statements or representations of or concerning MAP Retirement or its subsidiaries or affiliates, any of their clients or businesses or any of their current or former officers, directors or employees and (b) Company Parties (as defined below) shall not make, either directly or by or through another person, any oral or written negative, disparaging or adverse statements or representations of or concerning you; provided, however, that nothing herein shall prohibit (i) critical communications between you and the Company or Company Parties during the Initial Term and any Renewal Term and in connection with your employment or (ii) you or any Company Party from disclosing truthful information if legally required (whether by oral questions, interrogatories, requests for information or documents, subpoena, civil investigative demand or similar process). For purposes of this Agreement, the term "Company Parties" shall mean the executive officers and designated spokespersons of the Company. Disparagement is any comment, remark, or statement, in writing or verbally, that could harm a company or you. Disparaging comments hurt the brand perception, reputation, and profitability. Disparagement of any type will not be tolerated. All legal remedies will be pursued for any damages caused by disparagement.

# 404 Administrative Pay Corrections (Improper deductions)

MAP takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday.

In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of Payroll at payroll@map401k.com so that corrections can be made as quickly as possible.

## **405** Pay Deductions and Setoffs

The law requires that MAP make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. MAP also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." MAP matches the amount of Social Security taxes paid by each employee.

MAP offers programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their pay checks to cover the costs of participation in these programs.

Pay setoffs are pay deductions taken by MAP, usually to help pay off a debt or obligation to MAP or others such as, but not limited to, prepaid fees for educational courses and testing.

If you have questions concerning why deductions were made from your paycheck or how they were calculated, your supervisor can assist in having your questions answered.

## **501 Remote Work Arrangement**

MAP will determine the appropriate equipment needs for each remote working arrangement on a case-by-case basis. Equipment supplied by MAP will be maintained by the organization. Equipment supplied by the employee will be maintained by the employee. MAP accepts no responsibility for damage or repairs to employee-owned equipment. MAP reserves the right to make determinations as to appropriate equipment, subject to change at any time. Equipment supplied by the organization is to be used for business purposes only. The employee should sign an equipment agreement inventory of all office property and agrees to take appropriate action to protect the items from damage or theft. Upon termination of employment all company property will be returned to MAP.

Consistent with the organization's expectations of information asset security for employees working at the office fulltime, remote working employees will be expected to ensure the protection of proprietary company and customer information accessible from their home office. Steps include, but are not limited to, use of locked file cabinets and desks, regular password maintenance, and any other steps appropriate for the job and the environment.

The employee will establish an appropriate work environment within their home for work purposes. MAP will not be responsible for costs associated with initial setup of the employee's home office such as remodeling, furniture, or lighting, nor for repairs or modifications to the home office space.

Remote employees will be required to work regularly scheduled hours and report absences according to MAP policy.

Responsibility for fulfilling all obligations related to the legal implications for the business use of the employee's home based on IRS and state and local government restrictions rests solely with the employee.

Remote working is not designed to be a replacement for appropriate childcare, the focus of the arrangement must remain on job performance and meeting business demands. If there are children under the age of 12 in the home and/or other dependents who require care, it must be provided during the employee's scheduled working hours. Any hours where dependent care cannot be provided must be taken as paid time off. Employees should discuss expectations of remote working with family members prior to entering a remote working arrangement.

Employees entering into a remote working agreement are not subject to office closure due to weather events

## 502 Use of Phone System

Excessive personal use of telephones for incoming or outgoing calls, including local calls, is not permitted.

To ensure effective telephone communications, employees should always use the approved greeting and speak in a courteous and professional manner. Please confirm information received from the caller and hang up only after the caller has done so.

# 503 Cell Phone Safety and Driving

Safe driving is the priority when operating a vehicle while driving on **MAP Retirement** business. Your first responsibility is to pay attention to your driving. Never allow a cell phone or other mobile device to distract you from concentrating on driving.

Under no circumstances should you feel that you need to place yourself or others at risk while driving to fulfill business needs. You should follow these procedures to avoid distracted driving:

- Follow all applicable state and local laws that address the use of cell phones and other mobile devices while driving.
- Avoid using your cell phone while driving, and do not use it as a hand-held device. Find a safe place to pull over to make or receive phone calls, send, or receive text messages, or manipulate navigation apps.
- Program your destination into navigation apps or GPS devices before you start driving.
- Do not read or respond to text messages or e-mail or browse social media or the Internet while driving.
- Be aware of distractions from in-car "infotainment" systems. Just because they are built into the vehicle does not mean they do not create a hazardous distraction.

Employees who fail to follow safety guidelines are subject to discipline.

## **504 Meal Periods**

All full-time employees are provided with one meal period of at least 30 minutes each workday that exceeds six scheduled hours. Supervisors may assist in scheduling meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time.

## **505 Overtime**

When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime hours. When possible, advance notification of these mandatory assignments will be provided. All overtime work must receive the supervisor's prior authorization. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work.

Overtime compensation is paid to all nonexempt employees in accordance with federal and state wage and hour restrictions. Overtime pay is based on actual hours worked. Time off on sick leave, vacation leave, or any leave of absence will not be considered hours worked for purposes of performing overtime calculations.

# **506 Business Travel Expenses**

MAP may reimburse employees for reasonable business travel expenses incurred while on assignments away from the normal work location. All business travel must be approved in advance by your supervisor.

All expenses must be submitted monthly regardless of when incurred through the Paylocity expense report website or phone application.

All business expenses should be paid, if possible, using a MAP Retirement corporate credit card.

Employees whose travel plans have been approved should work with management to make all travel arrangements. When approved, the actual costs of travel, meals, lodging, and other expenses directly related to accomplishing business travel objectives may be reimbursed by MAP. Employees are expected to limit expenses to reasonable amounts.

Employees who are involved in an accident while traveling on business must promptly report the incident to their immediate supervisor. Vehicles owned, leased, or rented by MAP may not be used for personal use without prior approval.

With prior approval, employees on business travel may be accompanied by a family member or friend, when the presence of a companion will not interfere with successful completion of business objectives. Generally, employees are also permitted to combine personal travel with business travel, as long as time away from work is approved. Additional expenses arising from such non-business travel are the responsibility of the employee.

When travel is completed, employees should submit completed travel expense reports within 7 days. Reports should be accompanied by receipts for all individual expenses. Employees should contact their supervisor for guidance and assistance on procedures related to travel arrangements, expense reports, reimbursement for specific expenses, or any other business travel issues.

Abuse of this business travel expenses policy, including falsifying expense reports to reflect costs not incurred by the employee, can be grounds for disciplinary action, up to and including termination of employment.

## **601 Medical Leave**

MAP provides medical leaves of absence without pay to eligible employees who are temporarily unable to work due to a serious health condition or disability. For purposes of this policy, serious health conditions or disabilities include inpatient care in a hospital, hospice, or residential medical care facility; continuing treatment by a health care provider; and temporary disabilities associated with pregnancy, childbirth, and related medical conditions.

Employees in the following employment classifications are eligible to request medical leave as described in this policy:

- Regular full-time employees
- Regular part-time employees

Eligible employees should make requests for medical leave to their supervisors at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events.

A health care provider's statement must be submitted verifying the need for medical leave and its beginning and expected ending dates. Any changes in this information should be promptly reported to MAP Employees returning from medical leave must submit a health care provider's verification of their fitness to return to work.

Eligible employees are normally granted leave for the period of the disability, up to a maximum of 12 weeks within any 12-month period. Medical leave may not exceed this maximum limit.

Employees who sustain work-related injuries are eligible for a medical leave of absence for the period of disability in accordance with all applicable laws covering occupational disabilities.

Subject to the terms, conditions, and limitations of the applicable plans, health insurance benefits will be provided by MAP until the end of the month in which the medical leave begins. At that time, employees will become responsible for the full costs of these benefits if they wish coverage to continue. When the employee returns from medical leave, benefits will again be provided by MAP according to the applicable plans.

Benefit accruals, such as PTO will be suspended during the leave and will resume upon return to active employment.

So that an employee's return to work can be properly scheduled, an employee on medical leave is requested to provide MAP with at least two weeks advance notice of the date the employee intends to return to work. When a medical leave ends, the employee will be reinstated to the same position, if it is available, or to an equivalent position for which the employee is qualified.

If an employee fails to return to work on the agreed upon return date, MAP will assume that the employee has resigned.

# 602 Pregnancy-Related Absences

MAP will not discriminate against any employee who requests an excused absence for medical disabilities associated with pregnancy. Such leave requests will be evaluated according to PTO provisions outlined in this handbook and all applicable federal and state laws.

# 603 Sick Leave

If an employee misses 3 or more consecutive days because of illness, **MAP Retirement** may require the employee to provide a physician's written permission to return to work.

MAP is not required to approve unpaid time off and is not subject to FMLA (Family Medical Leave Act) requirements

## **605 Bereavement Leave**

MAP understands an Employee will need to take a **bereavement** leave upon the death of a member of their immediate family. "Immediate family members" are defined as an employee's spouse, domestic partner, parents, stepparents, siblings, children, stepchildren, grandparent, parent-in-law, brother-in-law, sister-in-law, son-in-law, daughter-in-law, or grandchild. You may exercise paid time off by contacting your supervisor and/or Human Resources with the amount of anticipated PTO time you would like to take. If there are extenuating circumstances the company may require verification of the need for the leave. The employee's supervisor and Human Resources will consider the extended time off on a case-by-case basis.

MAP is not required to approve unpaid time off and is not subject to FMLA (Family Medical Leave Act) requirements.

## **604 Military Leave**

**MAP Retirement** supports the military obligations of all employees and grants leaves for uniformed service in accordance with applicable federal and state laws. Any employee who needs time off for uniformed service should immediately notify the HR department and the employee's supervisor, who will provide details regarding the leave. If an employee is unable to provide notice before leaving for uniformed service, a family member should notify the supervisor as soon as possible.

Upon return from military leave, employees will retain certain rights with respect to reinstatement, seniority, layoffs, compensation, length of service promotions, and length of service pay increases, as required by applicable federal or state law. Failure to report for work within the prescribed time after completion of military service will be considered a voluntary termination.

All employees who enter military service may accumulate a total absence of 5 years and still retain employment rights.

# 606 Jury Duty/Court Appearance

MAP realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed to perform such civic service as required by law. Employees must present any summons to jury duty to their supervisor and <u>hr@map401k.com</u> as soon as possible after receiving the notice to allow advance planning for an employee's absence.

Employees are expected to keep management informed of the expected length of your jury duty service. If you are released from jury duty after 4 hours or less of service, the employee must report to work for the remainder of that workday. If the required absence presents a serious conflict for management, you may be asked to try to postpone your jury duty.

Nonexempt employees will be paid for up to 2 weeks of jury duty service at their regular rate of pay minus any compensation received from the court for the period of service. Exempt employees are subject to the same 2-week limitation except that they will also receive pay for any days they serve as a juror or witness in a workweek in which they perform work. All employees may use any accrued time off if required to serve more than 2 weeks on a jury.

Time for appearance in court for personal business will be the individual employee's responsibility. Normally, Personal Time Off (PTO) will be used for this purpose.

## Time Off for Voting

MAP Retirement recognizes that voting is a right and privilege of being a citizen of the United States and encourages employees to exercise their right to vote. In almost all cases, you will have sufficient time outside working hours to vote. If for any reason you think this won't be the case, contact your supervisor to discuss scheduling accommodations.

## 701 Employee Conduct and Work Rules

To ensure orderly operations and provide the best possible work environment, MAP expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment:

- Theft or inappropriate removal or possession of property
- Falsification of timekeeping records
- Working under the influence of alcohol or illegal drugs
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
- Fighting or threatening violence in the workplace
- Insubordination or other disrespectful conduct
- Sexual or other unlawful or unwelcome harassment
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Excessive absenteeism or any absence without notice
- Unauthorized use of telephones, mail system, or other employer-owned equipment
- Unauthorized disclosure of business "secrets" or confidential information
- Unsatisfactory performance or conduct

Employment with MAP is at the mutual consent of MAP and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

# 702 Disciplinary Procedure

**MAP Retirement** expects employees to comply with the company's standards of behavior and performance and to correct any noncompliance with these standards.

Under normal circumstances, **MAP Retirement** endorses a policy of progressive discipline in which it attempts to provide employees with notice of deficiencies and an opportunity to improve. It does, however, retain the right to administer discipline in any manner it sees fit. This policy does not modify the status of employees as employees at will or in any way restrict the company's right to bypass the disciplinary procedures suggested.

The following steps are suggested in the discipline procedure. All steps should be documented in the employee's personnel file.

#### Step 1: Informal Discussion.

When a performance problem is first identified, the nature of the problem and the action necessary to correct it should be thoroughly discussed with the employee.

## Step 2: Counseling.

If a private informal discussion with the employee has not resulted in corrective action, following a thorough investigation, the supervisor should meet with the employee and (a) review the problem, (b) permit the employee to present information regarding the problem, (c) advise the employee that the problem must be corrected, (d) inform the employee that failure to correct the problem will result in further disciplinary action that may include discharge, and (e) issue a counseling notice to the employee.

## Step 3: Reprimand.

If satisfactory performance and corrective action are not achieved under Steps 1 and 2, the supervisor and a representative from the HR department should meet with the employee in private and proceed via (a) through (d) above and issue a reprimand notice to the employee.

## Step 4a: Failure to improve.

Failure to improve performance or behavior after the written warning may result in suspension and/or termination.

## Step 4b. Suspension.

Supervisors have the authority to temporarily remove employees from the workplace, with or without pay, if approved in advance by the department director and the director of HR. An exempt employee generally may not be suspended without pay for less than a full day, and the suspension must be related to written workplace conduct rules applicable to all employees, such as a written policy prohibiting sexual harassment or workplace violence. OR The progressive disciplinary procedures described above also may be applied to an employee who is experiencing a series of unrelated problems involving job performance or behavior.

In cases involving serious misconduct, or any time the supervisor determines it is necessary, such as a major breach of policy or violation of law, the procedures contained above may be disregarded. Typically, the supervisor should suspend the employee immediately (with or without pay), and an investigation of the incidents leading up to the suspension should be conducted to determine if any further action, such as termination, should be taken.

# 703 Drug and Alcohol Use

It is MAP's desire to provide a drug-free, healthful, and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner.

While on MAP premises and while conducting business-related activities off MAP premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol or illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment, and/or required participation in a substance abuse rehabilitation or treatment program. Such violations may also have legal consequences.

Under the Drug-Free Workplace Act, an employee who performs work for a government contract or grant must notify MAP of a criminal conviction for drug-related activity occurring in the workplace. The report must be made within five days of the conviction.

Employees with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their supervisor or Human Resources without fear of reprisal.

## 704 Sexual and Other Unlawful Harassment

MAP is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. Actions, words, jokes, or comments based on an individual's sex, race, color, national origin, age, religion, disability, sexual orientation, or any other legally protected characteristic will not be tolerated.

Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list of sexual harassment examples:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Verbal sexual advances or propositions.
- Physical conduct that includes touching, assaulting, or impeding or blocking movements.

Unwelcome sexual advances (either verbal or physical), requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission or rejection of the conduct is used as a basis for making employment decisions; or, (3) the conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

If you experience or witness sexual or other unlawful harassment in the workplace, report it immediately to your supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact the supervisor, any other member of management or human resources. You can raise concerns and make reports without fear of reprisal or retaliation.

All allegations of sexual harassment will be quickly and discreetly investigated. To the extent possible, your confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, you will be informed of the outcome of the investigation.

Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise the owner or any member of management so it can be investigated in a timely and confidential manner. Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

# 705 Attendance and Punctuality

To maintain a safe and productive work environment, MAP expects employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on MAP. In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their supervisor as soon as possible in advance of the anticipated tardiness or absence. In cases when the supervisor is not immediately available to speak with, a message should be left, and another supervisor or employee should be spoken with to ensure the information regarding absence or tardiness is received.

Absenteeism and tardiness are disruptive. Either may lead to disciplinary action, up to and including termination of employment. Employees are considered absent when not present during a normal scheduled work period. Employees are considered tardy when they have not reported and are ready to work at their scheduled starting time.

# 706 Return of Property

Employees are responsible for all MAP property, materials, or written information issued to them or in their possession or control. Employees must return all MAP property immediately upon request or upon termination of employment. Where permitted by applicable laws, MAP may withhold from the employee's check or final paycheck the cost of any items that are not returned when required. MAP may also take all action deemed appropriate to recover or protect its property.

## **707 Resignation**

Resignation is a voluntary act initiated by the employee to terminate employment with MAP. Although advance notice is not required, MAP requests at least 2 weeks' written resignation notice from all employees.

Prior to an employee's departure, an exit interview will be scheduled to discuss the reasons for resignation and the effect of the resignation on benefits.

Acceptance of. Employee has read, understands, fully accepts the entirety of the MAP Retirement employee handbook, policies within, and further implications to said employee, with the acceptance of each bi-weekly compensation paid by MAP Retirement, unless expressly prohibited by law.