

Corrigan & Associates

Employee Handbook

Revised 2008

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## Handbook Acknowledgement and Receipt

By signing below, I acknowledge I have received my copy of the Corrigan & Associates Employee Handbook. Furthermore, I agree to abide by the terms, policies and procedures outlined herein. I agree that if there is any policy or provision in the Handbook that I do not understand, I will seek clarification from my manager. I further understand that the Handbook does not create an employment agreement, contract, or covenant with regard to length or conditions of employment and it in no way prevents me or the Company from terminating our employment relationship at any time for any reason.

I also understand that these policies and procedures are continually evaluated and that that the provisions of this Handbook may be changed, updated, superseded, or deleted at any time and without prior notification. Finally, I understand that senior management has final interpretation of all policies.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Print Name \_\_\_\_\_

## **WELCOME TO Corrigan & Associates**

**We are pleased to have you join our Companies.** You were carefully selected for your position and now you are an important member of our team.

This handbook is provided to inform you about Corrigan & Associates and some of the basic policies, procedures, guidelines, and responsibilities that you will need to know as you continue your employment with Corrigan & Associates. We regularly review all employment policies, procedures, and benefits and, as we believe changing business needs require, we will revise them and adopt new ones. We will do our best to keep you updated as changes are implemented. If, however, you have any questions or concerns, please contact your manager.

We are excited that you made the choice to join Corrigan & Associates. We believe the opportunity to meet the needs of the insurance buying public is a challenge worthy of our best efforts. Consequently, one of our objectives for you is to be proud to accept that responsibility. It is our intent to provide you an environment that supports attainment of this objective.

*We wish you much success at Corrigan & Associates.*

## Company History

Corrigan & Associates, founded in 1971 by William P. Corrigan, CLU, CPCU, is an independent insurance agency offering all lines of insurance, both Commercial and Personal, including coverage around the world. We offer Life Insurance, Long Term Care Insurance, and both Group and Individual Health Insurance. Our product lines also include Mutual Funds and Annuities, including Variable Annuities. We represent primarily the Nationwide Companies although we have the capacity to provide insurance coverage to those clients who have other needs. Corrigan & Associates is also NASD registered.

Corrigan & Associates now ranks among the largest privately owned insurance agencies in the nation. The Agency has earned multiple awards, including the Nationwide Insurance prestigious Presidents Conference, which the Agency has earned on numerous occasions. The Agency has been honored by Nationwide with induction into the Nationwide Insurance Hall of Fame.

Corrigan & Associates is directed by its Management Council headed by President Kelley Ann Corrigan, a second generation Corrigan. Mr. Corrigan continues to serve as Chairman of the Board. The Council brings widely diversified and highly experienced leadership to the Agency allowing it to serve over 40,000 clients in Maryland, Virginia, Delaware, Pennsylvania, Florida and the District of Columbia.

To serve the needs of its clients, Corrigan & Associates provides personal and commercial consultation in their office, the client's office or in the client's home.

## Company Objectives

The objectives of the Corrigan & Associates have been designed to benefit our clients, our employees and the companies we represent. By performing our best for these three very important groups, we produce the growth targets and the profitability targets the Agency desires; the same growth and profitability targets that will allow all of us to grow as well-rounded individuals and solid citizens.

It is our objective to provide our clients with outstanding quality service. Our clients, large and small, have shown their faith in our ability to provide outstanding service. We must always be prompt, courteous, and knowledgeable. **OUR SERVICE MUST ALWAYS BE THE BEST.**

It is our objective to provide an environment that respects the rights and individual dignity of each of our employees. It is our intent to provide an environment that supports the growth and development of our employees.

\* \* \* \* \*

### ***Outstanding Customer Service Guidelines***

- Always return OUR CLIENT's call within the same business day.
- Always respond to OUR CLIENT's letter within two business days.
- Always include "I Care" type statements when responding to our clients.
- Always present a caring and enthusiastic attitude to OUR CLIENT.
- Always communicate with OUR CLIENT in a non-technical manner, avoiding difficult insurance terms and concepts.
- Always review OUR CLIENT's coverage and be sure you leave them better off after their call than before the call.

Remember, sales and client service is a continuing effort. You may be the last person to communicate with OUR CLIENT. Be certain the client has a positive experience so that he/she looks forward to their next visit with Corrigan & Associates.

## **Equal Employment Opportunity**

Corrigan & Associates provides equal opportunity to all employees on the basis of individual qualifications without regard to race, sex (including pregnancy), religion, color, age, national origin, non-job-related disability, sexual orientation or any other factor protected by federal, state or local law. It is our policy to recruit, hire, and promote individuals, as well as administer any and all personnel actions without regard to race, sex, color, age, religion, national origin, non-job related disability, sexual orientation or any other factor protected by federal, state or local law. Any violation of this policy should be brought to the attention of senior management.

## **Diversity**

Corrigan & Associates continues to expand our efforts to understand and promote diversity within our workplace, our client relationships, our industry, and our communities. We provide an environment that promotes respect, integrity, teamwork, achievement and acceptance regardless of race, gender, age, national origin, sexual orientation, religion, socio-economic status, education, job level, parental status, disability, marital status or other protected factor.

## **Employment at Will**

Employment with Corrigan & Associates is voluntarily entered into and employees are free to resign at any time. Similarly, Corrigan & Associates is free to conclude an employment relationship any time it believes it is in the Company's best interest to do so, with or without notice or cause.

While Corrigan & Associates hopes that its relationship with each of its employees will be a long and mutually beneficial one, nothing in the handbook creates an expressed or implied contract of employment. Our relationship is one of voluntary employment that is terminable by either Corrigan & Associates or an employee at will.

## **Harassment and Discrimination Policy**

It is Corrigan & Associates policy to treat all employees with dignity and respect and to provide a work environment free from harassment and discrimination. No employee should be subjected to harassment or discrimination by another employee, manager, client or visitor and all employees should be aware of what harassment, both sexual and non-sexual, and discrimination are and what steps to take if harassment or discrimination occurs. This policy not only applies to employees but also to organizations with whom we have business relationships and others functioning under the Company's control.

### ***Harassment in General***

Harassment can be defined as behavior that demonstrates hostility toward another individual based on race, national origin, color, religion, age, disability, gender, marital status, sexual orientation, veteran status, socioeconomic status or other factors protected by federal, state or local law. The behavior constitutes harassment when it unreasonably disrupts or interferes with a person's work performance or creates an intimidating, hostile or offensive work environment. Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping, threatening, intimidating or hostile acts, denigrating jokes; and written or graphic materials that denigrates or show hostility or aversion toward an individual or group and that is placed on the employer's premises or circulated in the workplace.

### ***Sexual Harassment***

All of our employees have the right to a workplace free from sexual harassment and Corrigan & Associates does not and will not tolerate sexual harassment in any manner. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other conduct of a sexual nature, or conduct based on an individual's gender where:

- 1) Submission to such conduct is made a term or condition of an individual's employment, either explicitly or implicitly,
- 2) Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment, or
- 3) Such conduct unreasonably interferes with an individual's work performance or has the effect of creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. These behaviors may include, but are not limited to: unwanted and unwelcome sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; other physical, verbal or visual conduct of a sexual nature; or conduct based on an individual's gender.

## **Coverage**

In no uncertain terms, harassment, sexual and non-sexual, and discrimination is a form of employee misconduct. An employee engaging in harassment or discrimination will be subject to disciplinary action up to and including termination, and can be held personally liable for damages.

## **Complaint Procedure**

The Company encourages individuals who believe they are being subjected to harassment or discrimination to address the issue, regardless of the alleged offender's identity or position. To protect employees' rights, Corrigan & Associates has established the following procedure to facilitate the investigation and resolution of claims of harassment or discrimination:

- 1) If possible, the employee affected should politely but firmly advise the offender that his or her behavior is unwelcome and request that it stop immediately. The individual may not realize that his or her behavior is offensive and often this action alone will end the unwelcome advances or behavior. It is not necessary for an employee to speak directly to the offender if he or she feels uncomfortable or believes that negative employment consequences may result.
- 2) If for any reason an employee does not wish to address the offender directly, or if such action does not end the offensive conduct, the employee should notify his or her immediate supervisor, his or her supervisor's supervisor, or any member of the management team.

Claims of harassment or discrimination will be investigated promptly and confidentiality will be maintained throughout the investigative process to the extent consistent with adequate investigation and appropriate corrective action. Retaliation against any employee who opposes harassment or discrimination, files a complaint, testifies or participates in an investigation of a claim of harassment or discrimination is prohibited and will be subject to disciplinary action. Acts of retaliation should be reported immediately.

While it is not the purpose of this policy to regulate an employee's personal morality, we consider harassment, discrimination or retaliation to be an act of misconduct and subject to appropriate disciplinary action, up to and including termination of employment. False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action. On the other hand, an employee will not be disciplined merely because the complaint is found to be without merit. Corrigan & Associates does not condone retaliation against any employee for making a report in good faith under this Policy.

## **Workplace Violence Policy**

Corrigan & Associates is committed to maintaining a work environment that is safe and free of all forms of violence and strictly prohibits employees from making threats or engaging in violent acts. Employees who engage in conduct prohibited by this policy will be subject to disciplinary action up to and including termination and may be reported to law enforcement authorities.

### ***Prohibited Conduct***

Corrigan & Associates does not tolerate any type of workplace violence committed by or against Corrigan & Associates employees, customers or visitors on Company premises, or while engaged in Company business off of Company premises. This list of behaviors, while not all-inclusive, provides examples of conduct that is prohibited:

- Causing physical injury to another person
- Making threatening remarks
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person
- Intentionally damaging employer property or property of another employee on workplace premises
- Possession of a weapon while on Company property or while on Company business (even if the employee has a state permit)
- Committing acts motivated by, or related to, domestic violence on Company premises

### ***Reporting Procedures***

Any potentially dangerous situations must be reported immediately to a supervisor or manager. All employees have an obligation to report conduct in the workplace which they reasonably believe to be suspicious or situations that appear problematic, regardless of the alleged offender's identity or position. While we do not expect employees to be skilled at identifying potentially dangerous persons, employees are expected to exercise good judgment and to inform a supervisor or manager if any employee, client or visitor exhibits behavior which could be a sign of a potentially dangerous situation. Such behavior includes:

- Obsession with weapons or bringing them into the workplace
- Displaying overt signs of extreme stress, resentment, hostility or anger
- Making threatening remarks
- Sudden or significant deterioration of performance
- Displaying irrational or inappropriate behavior
- Changes in personal behavior and interaction with co-workers.

All individuals working on Company premises who apply for or obtain temporary or permanent protective or restraining orders which list Corrigan & Associates as a protected area must present to senior management any petition or declarations seeking such orders.

### ***Confidentiality***

Reports can be made anonymously and all reported incidents will be taken seriously and investigated. Employee reports made pursuant to this policy will be treated as confidential to the extent consistent with adequate investigation and appropriate corrective action. Corrigan & Associates does not condone any form of retaliation against any employee for making a report in good faith under this policy.

### ***Enforcement***

Any employee determined to have committed such acts prohibited by this policy will be subject to disciplinary action, up to and including termination as well as arrest or prosecution when applicable. Non-employees engaged in violent acts on Company premises will be reported to the proper authorities and fully prosecuted as appropriate. Corrigan & Associates reserves the right to remove any person from its premises if that person's behavior is perceived to threaten the safety of its employees, clients or visitors, and any person removed from the premises shall remain off the premise pending the outcome of the Company's investigation. Corrigan & Associates may also request a "fitness for duty" certification from a health care professional before allowing the employee to return to work.

## Confidentiality of Company Information

All employees are asked to sign the following statement at the time of employment:

“In consideration of my employment with Corrigan & Associates, I will be exposed to information and materials which are confidential and proprietary and of vital importance to the economic well-being of Corrigan & Associates. I will not at any time disclose or use, either during or subsequent to my employment, any information, knowledge, or data which I receive or develop during my employment which is considered proprietary by Corrigan & Associates. Such information, knowledge or data includes the following which is by example only: processes, know-how, designs, drawings, diagrams, formulas, test data, accounting or financial data, pricing or salary data, marketing data, business plans and strategies, negotiations and contracts, research, customer or vendor lists.

I further agree that upon termination of my employment with Corrigan & Associates, I shall promptly return any and all documents containing the above information, knowledge or data, or relating thereto, to Corrigan & Associates. This agreement shall be binding upon my successors, heirs, assigns, and personal representatives and shall be for the benefit of the successors and assigns of Corrigan & Associates. In the event that a dispute arises concerning this agreement and a lawsuit is filed, the prevailing party shall be entitled to reasonable attorney’s fees and costs.

I acknowledge that the proprietary information and trade secrets are created at substantial cost and expense to Corrigan & Associates and that unauthorized use or disclosure would cause irreparable injury to Corrigan & Associates. I hereby consent to the order of an immediate injunction, without bond, from any court of competent jurisdiction, enjoining and restraining me from violating or threatening to violate this provision.

I understand that my continued employment with Corrigan & Associates is contingent upon my compliance with this agreement.”

\_\_\_\_\_  
Employee’s Signature

\_\_\_\_\_  
Date

## **Privacy of Client Information**

Maintaining the trust and confidence of our clients is of fundamental importance to our Company. In providing services, we may obtain nonpublic personal information about our clients and prospective clients, such as social security numbers, addresses, phone numbers, financial information, and/or transaction histories. We are committed to keeping nonpublic personal information about our clients, prospective clients and former clients secure and confidential.

It is the responsibility of each employee to help maintain the confidentiality of clients' nonpublic personal information and to guard against unauthorized access to, or use of this information. Employees may not use nonpublic personal information, or disclose nonpublic personal information to any third party, unless used or disclosed in accordance with all applicable procedures of the Company. If there is a question about whether certain nonpublic personal information may be disclosed to a third party, talk with your supervisor.

## **Copyright Protections**

It is the Company's policy that no copyright protected materials may be copied, either via hard copy or electronically, without the prior written permission of the author or publisher.

The copyright laws are complex and all employees must exercise extreme care when considering the proper use of copyrighted materials. For instance, many persons incorrectly assume that in order to have copyright protection, materials must bear a copyright "©" legend. In fact, there is no requirement that copyrighted materials be labeled. While it, therefore, can sometimes be difficult to tell whether a particular item is copyrighted, in general, any materials that are sold are protected. However, noncommercial materials may also have copyright protection.

Employees should also bear in mind that in addition to making paper copies, it is also possible to violate copyright protections by forwarding protected materials to third parties via e-mail or other means of electronic communications.

## **Company Ownership**

Any inventions, intellectual property, trademarks, copyrights, improvements or proprietary rights, which an employee creates during the time he/she is employed by the Company that pertains to our business, belong to the Company. Further, an employee agrees to assign any interest he/she may have in these things to the Company upon request.

## **Business Ethics**

Our Company's employees will maintain the highest ethical standards in the conduct of the Company's affairs. Each employee will conduct the Company's business with integrity and comply with all applicable laws in a manner that excludes considerations of personal advantage or gain.

### ***Gratuities to and from Customers or Supplier Representatives***

Corrigan & Associates' employees (including management) shall not solicit, accept, or offer entertainment, gifts, or gratuities that have the appearance or effect of influencing the judgment of the recipient in the performance of his/her duties.

Business decisions must be made impartially and on the basis of such factors as price, quality, service, financial responsibility and the maintenance of reliable sources of supply. Employees must ensure that any business courtesy offered or received does not influence or appear to influence business decisions.

### ***Conflict of Interest***

No employee of Corrigan & Associates shall engage in the same or a similar line of business as that carried on by the Company. An employee shall not have a financial interest in a Company which is a competitor of or supplier to the Company.

Financial interests held by an employee or by his or her immediate family members in such companies are to be disclosed immediately to the Company so that a determination can be made as to whether a conflict exists. Members of the employee's immediate family include spouse, children, and any other relative sharing the same home as the employee.

## **Solicitation and Distribution of Solicitation Materials**

The Company does not allow unauthorized solicitation of its employees for any reason. In order to prevent disruptions in operations and inconvenience to our employees, the following guidelines will apply to solicitation and distribution of literature and other materials.

### ***Non-employees***

Persons not employed by Corrigan & Associates may not solicit or distribute materials or literature for any purpose or at any time within our facilities or on Company property. Property is meant to include the buildings, parking areas, and all grounds to the property lines.

### ***Employees***

With the exception of Company-approved campaigns, employees may not solicit or distribute literature for any purpose during working time. Distribution of literature by employees is restricted to non-working areas and only during their free time, such as coffee breaks, mealtime, or rest periods, of both the employee distributor and the employee to whom this activity is directed.

The Company's e-mail system and other communication methods are restricted to items authorized by the Company and are not to be used for any other purpose.

## **Communications**

Communications are an integral part of any organization. Keeping employees advised and informed of Company activities and policies are important objectives of the Company. Because electronic mail and other devices are Company sponsored means of communication, they may be monitored by the Company to ensure proper use without prior notice to employees. Employees should have no expectation of privacy with regard to these communications systems and should utilize these systems for personal or private matters infrequently, if at all.

## Computer System Security Policy

Computer systems have become integral elements of our Company's ability to serve our clients. Our employees use computers daily for, among other tasks, transactions, communications, record keeping and word processing. In order to maintain the trust our clients have placed in us, our computer system security must be approached with the same high standards of ethics and quality as we set for all aspects of our business.

Computer Materials used at Corrigan & Associates are the exclusive property of Corrigan & Associates. As used herein, the term Computer Materials includes all Corrigan & Associates information of any nature, system IDs, passwords, computer hardware, computer software, computer records, documentation, computer manuals, printouts, diskettes, related peripherals and media, voice mail, electronic mail, and all related materials, hardware, and software. Computer Materials may be utilized for business-related purposes only, and must be in full compliance with all licensing agreements. It is Corrigan & Associates policy that neither software nor other copyable Computer Materials are to be copied, given away, or installed unless done so in accordance with all applicable Corrigan & Associates procedures, U.S. copyright laws and applicable licensing requirements.

Depending on the circumstances, violations of this policy is a basis for disciplinary action, including termination of employment. A violation may have additional legal consequences. Corrigan & Associates Computer System Security Policy includes the following specific points:

- Confidentiality – Non-public information relating to Corrigan & Associates, its employees, former clients, existing clients, or prospective clients may not be disclosed (or copies given away in any form).
- Ownership – All Company Materials are the property of Corrigan & Associates and are not the property of individual employees. This includes all information about Corrigan & Associates, its employees, former clients, existing clients or prospective clients.
- No Expectation of Privacy – All messages and information of any type in any system or type of computer material are open to access and review by Corrigan & Associates. All computer messages and information, including all information stored on personal computers, diskettes, electronic mail (e-mail) and voice mail are Company records, and may be saved, accessed, and reviewed by Corrigan & Associates.
- Limited Personal Use of Systems – All of the systems and Computer Materials at Corrigan & Associates are for business rather than personal use. Business use of non-Company provided email systems is strictly prohibited. This includes the use of Web based e-mail such as Hotmail, Yahoo-mail, etc.
- Passwords and Computer Access – Passwords and computer access to any Corrigan & Associates system inside or outside of the Company will not be disclosed, given away, displayed or shared. This includes all types of access mechanisms (IDs, passwords, etc.) for all systems (computer, voice, etc.)
- Internet – All use of the Internet must be exclusively for Corrigan & Associates business purposes. Access may be monitored and may be revoked. Viewing or downloading of text or graphics which could be deemed offensive or hurtful to coworkers or clients is strictly prohibited.

- Electronic Mail (e-mail) – Communications sent or received on Computer Materials or in the conducting of Corrigan & Associates business must comply with Company policy. Any communication and/or distribution of materials which could be deemed offensive or hurtful to coworkers or clients are strictly prohibited.

**NOTE: Employees should have no expectation of privacy with respect to computer use.**

## **Personal Use of Company Systems**

### ***Personal Phone Calls***

A large percentage of the Company's business is transacted by telephone. The telephone equipment is provided for the purpose of providing service to our clients. Therefore, employees must limit personal phone calls and make every effort to make personal calls during breaks or lunch periods. No long distance personal calls may be made on Company phones. Personal phone calls must not interfere with productivity and business needs.

Personal cell phones should be used only for emergencies or at break times. Please turn off cell phones while you are at your desk. Please see *Cell Phone Policy*.

Corrigan & Associates does have the ability to monitor all calls. For training and supervisory reasons only, we will, on occasion, monitor all calls.

### ***E-mail and Internet***

Inappropriate use of E-mail and Internet systems continues to be an issue for many companies. Below are a few pointers on the appropriate use of the E-mail and Internet systems:

- The Company's E-mail and Internet access should be used for appropriate business use only.
- Soliciting Corrigan & Associates employees for causes not specifically sponsored by the Company is not allowed and "broadcast" E-mails to all employees or large groups of employees must be approved by your manager.
- The forwarding or distribution of junk E-mail, inappropriate jokes or other similar items are prohibited. Further, E-mail correspondence or Internet sites which could be deemed offensive to co-workers or clients are prohibited. Employees should have no expectation of privacy, and should not communicate personal or private matters on Company communication systems.

### ***Mail and Shipping***

Corrigan & Associates is dependent upon an efficient and economical system of receiving and sending mail. Postage and shipping costs represent a significant part of the Company operating budget. In addition, the handling and processing of mail requires the time and effort of employees. To facilitate the efficient and economical receipt and dispatch of mail, no personal use of the Company's mail system shall be permitted including, without limitation, the use of Company stationery or envelopes, or postage or postage meters for personal purposes.

## **Cell Phone Policy**

### ***Personal Cellular Phones***

While at work employees are expected to exercise the same discretion in using personal cellular phones as is expected for the use of Company phones. Excessive personal calls during the workday, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees are therefore asked to make personal calls on non-work time and to ensure that friends and family members are aware of the Company's policy. Flexibility will be provided in circumstances demanding immediate attention.

Employees should not, under any circumstances, provide their personal phone number(s) to our clients.

The Company will not be liable for the loss of personal cellular phones brought into the workplace.

### ***Safety Issues for Cellular Phone Use***

Employees whose job responsibilities include regular or occasional driving are expected to refrain from using their phone while driving. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are strongly encouraged to pull off to the side of the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is unavoidable and pulling over is not an option, employees are expected to keep the call short, use hands-free options if available, refrain from discussion of complicated or emotional discussions and keep their eyes on the road. Special care should be taken in situations where there is traffic, inclement weather or the employee is driving in an unfamiliar area.

Employees who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions.

## **Absence and Tardiness Policy**

Providing outstanding service to our clients is critical to the success of our business. It is important that every employee has good attendance and is on time to work. Unscheduled absences and/or tardiness place a burden on co-workers and interrupt our client service. Corrigan & Associates recognizes that illnesses and other personal situations may force you to be absent or late from work; however, please be aware of the following:

- You are expected to call into and speak directly to your manager/supervisor prior to the start of your schedule.
- Non-exempt employees who will arrive to work more than fifteen (15) minutes late, should not report to work until ½ day due to pay calculations.
- Failure to report an absence or tardiness may be cause for disciplinary action up to and including termination.
- Failure to report to or call into work for three consecutive business days will be considered a voluntary resignation.

## **Job Abandonment Policy**

An employee who is unable to report to work at the designated time is required to notify his or her supervisor in accordance with the *Absence and Tardiness Policy*. Employees who fail to report to work for three consecutive business days without notifying the Company of the absence will be considered as having voluntarily resigned as a result of job abandonment.

If the employee is unable to contact Corrigan & Associates during that time due to extreme circumstances such as serious illness, the employee should contact or have his/her agent contact the Company as soon as practicable to explain the situation. The Company will determine if the voluntary resignation will be upheld or in the case of serious health conditions if FMLA would apply to eligible employees.

## **Alcohol and Illegal Substance Policy**

Corrigan & Associates is committed to providing a safe work environment and to fostering the well-being and health of its employees. In addition, Corrigan & Associates has an obligation to provide our clients with reliable, accurate advice and service. These commitments are jeopardized when any employee uses illegal drugs or alcohol on the job, comes to work with these substances in their body, or possesses, distributes or sells drugs in the workplace.

Corrigan & Associates has established the following policy with regard to alcohol or other drugs to ensure that we can meet our obligations to our employees, our clients, and the general public.

No employee may use, possess, distribute, purchase, sell or be under the influence of alcohol or illegal drugs while on the Company premises or while conducting Company business. It will not be a violation of our policy for an employee to use legally prescribed drugs (in prescription containers) so long as it does not affect the employees' ability to perform their job. The employee should consult with his/her physician and supervisor to discuss whether he/she can safely perform his/her job.

Violation of this policy may result in disciplinary action including termination of employment or required participation in a treatment program. Employees who participate in a treatment program may not construe the participation in the program as a guarantee of job retention or as protection from disciplinary action for substandard performance. Management reserves the right to take any appropriate disciplinary actions, up to and including termination, where warranted.

## **Smoking Policy**

No smoking will be permitted in any Company location or in any client areas. The Company's "No Smoking" policy precludes the use of all tobacco products, including chewing tobacco, pipes, cigars and cigarettes while in any area of the workplace. This policy is for the health and safety of all employees.

The smoking policy for building common areas is determined by each location. Please check with your manager regarding common area smoking policies.

Employees who smoke are expected to observe the same guidelines as non-smokers for the frequency and length of break periods.

## **Gambling Policy**

Gambling is not permitted on Company premises at any time.

## **Personal Appearance**

As a representative of Corrigan & Associates, it is expected that you present a business-like appearance during business hours. All employees should be neat, well groomed and dressed in job-appropriate attire. We do not have “casual days”. Employees must maintain a professional image at all times.

The guidelines below provide illustrations of acceptable and unacceptable attire. They are for your reference in judging the appropriateness of the clothing you wear to work.

Please discuss any questions with your supervisor.

### ***Acceptable Business Attire***

- All employees will practice good grooming and hygiene habits, with neatness and cleanliness being of primary concern.
- Skirts, dresses, business suits and pant suits for women should be in good taste and of an appropriate length for business. Men have the choice of dress slacks and a button shirt or sweater, with or without a tie. Suits and/or blazers are acceptable.
- Jewelry can compliment a professional image; too much jewelry can be a distraction. No more than two holes per ear. Any other piercing such as the nose, tongue, eyebrows are NOT acceptable in any form.
- Tattoos of any kind should be covered and not visible during working hours.

### ***Unacceptable Attire***

Clothing that should not be worn during business hours includes:

- Any clothing made of denim.
- T-shirts with “messages”.
- Excessively tight or revealing clothing.
- Shorts of any fabric or length.
- Sneakers, hiking boots and beach shoes.

## Privacy

Workplaces, desks, and property brought onto and taken off of Company premises are subject, at any time, and without prior notice to inspection by the Company. Employees should have no expectation of privacy with respect to such workspaces and property.

### ***Employee Personnel Files***

Corrigan & Associates believes that nothing should be placed in an employee's personnel file unless there is a clear business reason for doing so. Our employee privacy philosophy is further reflected in the following statements:

- Personnel files will include only job-related information pertinent to your employment.
- Employees may see information in their personnel files. If an employee disagrees with the information, he or she may submit written comments that will be attached to the information.
- When asked to do so by an employee, the Company will explain its need for certain personal information.
- Personnel files are open only to Company personnel on a business-related, need-to-know basis unless the Company is legally required to release them by court order or subpoena.
- Employees must give their written permission before there will be external disclosure of their personal information, with the exception of the following information:
  - Verification of dates of employment and positions held
  - Personal information which the Company is legally required to reveal by court order or subpoena. In the latter case, the employee will be informed prior to the disclosure if reasonably possible.

## **Personal Property**

The Company does not accept responsibility or make reimbursement for lost or stolen personal property. The Company strongly recommends that employees keep their personal belongings in a safe and secure location.

## **Safety**

Corrigan & Associates strives to provide its employees with a safe and healthful workplace environment. To accomplish this goal, both management and employees must diligently undertake efforts to promote safety.

All job-related injuries or illnesses are to be reported to your supervisor immediately, regardless of severity. In the case of serious injury, an employee's reporting obligation will be deferred until circumstances reasonably permit a report to be made. Failure to report an injury or illness may preclude or delay the payment of any benefits to the employee and could subject Corrigan & Associates to fines and penalties.

## **Employment Classification**

Corrigan & Associates has several types of employment classifications. A brief description of the different categories is listed below.

### ***Full-time Employees***

Full-time employees are normally salaried employees and work 34 hours per week over 4 days or 40 hours per week over 5 days. Employees may be given a choice of a 4 day or 5 day work week based upon business requirements, seniority and performance. Full-time employees are eligible to participate in employee benefit programs in accordance with the provisions of each plan.

### ***Part-time Employees***

Part-time employees normally work a minimum of 20 hours per week but less than 34 hours. Part-time employees are not eligible to participate in employee benefit programs.

### ***Temporary Employees***

Temporary employees are hired by the Company to work for a specific period of time, usually less than six months, or on an irregular basis and at a specific hourly rate. Temporary employees are not eligible to participate in any employee benefit programs.

### ***Exempt and Non-Exempt Employees***

Provisions in the Fair Labor Standards Act classify all employees into exempt and non-exempt categories. Exempt employees, generally those in management, supervisory, or professional positions, are not eligible for overtime pay as defined by Federal Wage and Hour Laws.

## **Job Posting Policy**

Corrigan & Associates encourages career growth and development of employees. In order to accomplish these goals the Company has established a Job Posting Policy. The policy is intended to provide current employees with the ability to view job opportunities within the Company.

Prior to any outside recruitment, the Company will announce all new and/or open positions within the Company for five working days. All new and/or open positions will be announced on the Company bulletin board or other appropriate format.

All present employees are encouraged to review the requirements for each position and apply for those positions in which they are interested. Applications will be given the same consideration as outlined in the Company *Recruitment Policy*.

## **Recruitment Policy**

Corrigan & Associates is committed to attracting, hiring and retaining top caliber individuals to all levels of the organization. Company positions may be filled by either transfer or promotion of existing employees, or by new employees who are recruited or who apply. Recruitment may be conducted through advertising, employment agencies, schools, employee referrals, or technical and trade referrals.

As stated in the Job Posting Policy, a list of current openings will be posted on all Company bulletin boards.

Corrigan & Associates is an Equal Opportunity Employer and does not discriminate on the basis of race, color, religion, sex, age, marital status, national origin or physical/mental disability. It is our policy to recruit, hire, and promote individuals, as well as administer any and all personnel actions without regard to race, sex (including pregnancy), color, age, religion, national origin, non-job related disability, sexual orientation or any other factor protected by federal, state or local law.

## **Employment of Relatives**

Corrigan & Associates permits the hiring of relatives of current employees, if the applicant is qualified and selected by the hiring manager/supervisor. The primary consideration for placement is the proximity of the relatives' work areas to each other. Only in extraordinary circumstances, with management approval, should a relative directly or indirectly supervise an employee. A relative is defined as any person related to the employee by blood, marriage, or adoption.

## **Outside Employment**

Corrigan & Associates recognizes that employees sometimes seek to obtain outside employment. Outside employment cannot create any conflict of interest with the Company, nor may it interfere with any job duties or hours.

Employees are required to notify their supervisor/manager regarding outside employment.

## **Changes in Employee Information**

All employees must notify their supervisor/manager of changes to his/her personal contact information. Inaccurate or outdated information can lead to a delay in the case of an emergency or accident. We also need to ensure that payroll and tax records, along with other information in an employee's files are kept accurate and current.

Changes in address, telephone number, emergency contact name and number should be reported to the employee's supervisor or manager.

Changes in marital status, number of dependents, beneficiaries, benefits and/or name should be reported to the appropriate manager.

Changes to one's healthcare coverage can only be made within 30 days of a life event (i.e. birth of child, marriage, etc.) or during the Company-wide open enrollment period.

Please contact your manager with any questions.

## **Anniversary Date**

An employee's anniversary date is defined as the first of the month following 30 days of employment. It is recommended that performance reviews be completed annually in the first month following the employee's anniversary date. However, if a performance review has not been completed prior to the employee's anniversary date and a salary adjustment is recommended, it may be made retroactive to the anniversary date.

## **Rehire/Reinstatement**

Any former full-time or part-time employee rehired at Corrigan & Associates within the guidelines listed below is reinstated and will maintain their original anniversary date for seniority purposes as well as for those benefit programs governed by the anniversary date. Any former full-time or part-time employee rehired after the guidelines listed below will be classified as a new hire. The Reinstatement Policy is:

### ***Layoff***

Employees who terminate because of reduction in work force will maintain their original anniversary date for seniority purposes, if they are re-employed by Corrigan & Associates within ninety (90) days after the date of termination.

### ***Voluntary Resignation***

Employees who voluntarily terminate their employment with Corrigan & Associates will maintain their original anniversary date if they are re-employed by the Company within ninety (90) days after the date of termination.

The Company is under no obligation to rehire any employee.

## **Performance Improvement Policy**

In order to attract and retain a highly qualified and competent work force, Corrigan & Associates has implemented a performance management program to compensate employees in a fair and equitable manner based upon demonstrated job performance, and in accordance with its Equal Employment Opportunity policy.

In the event that an employee's performance is less than satisfactory and management believes it may be improved through adequate counseling, a performance improvement program may be suggested. The steps in a performance improvement program may include verbal counseling, written counseling, final warning, and/or suspension. Corrective counseling is completely at the discretion of Company management. The Company desires to protect its investment of time and expense devoted to employee orientation and training whenever that goal is in the Company's best interest. The Company expressly reserves the right to discharge "at will". Even if corrective counseling is implemented, it may be terminated at any step at the discretion of management. Management, in its sole discretion, may warn, reassign, suspend, or discharge any employee at will, whichever it chooses and at any time.

The supervisor/manager, with assistance of senior management will determine the course of action best suited to the circumstances.

## **Disciplinary Suspensions**

In compliance with FLSA, the Company reserves the right to suspend both exempt and non-exempt employees for disciplinary reasons for an amount of time the Company deems appropriate including less than one full week. Disciplinary suspensions are generally suspensions without pay.

## Termination and Exit Procedures

Employment with the Company is normally terminated through one of the following actions:

- Resignation – voluntary termination by the employee
- Dismissal – involuntary termination for substandard performance or misconduct
- Layoff – termination due to reduction of the work force or elimination of a position

### ***Resignation***

Because our business involves so much confidential information, an employee who wants to terminate employment, regardless of employee classification, is not expected to give any advance notice. This is not to be construed as a reflection upon the employee's integrity, but an action in the best interests of business practice. Since no notice is necessary, no severance pay will be given.

### ***Dismissal***

Substandard Performance - An employee may be discharged if his or her performance is unacceptable. The supervisor/manager shall have counseled the employee concerning performance deficiencies, provided direction for improvement, and warned the employee of possible termination if performance did not improve within a defined period of time. The supervisor/manager may have implemented a performance improvement program. The supervisor/manager is expected to be alert to any underlying reasons for performance deficiencies. The senior manager must concur in advance of advising the employee of discharge action. Documentation to be prepared by the supervisor/manager shall include reasons for separation, performance history, corrective efforts taken, alternatives explored, and any additional pertinent information.

Misconduct – An employee found to be engaged in activities such as, but not limited to, theft of Company property, insubordination, conflict of interest, or any other activities showing willful disregard of Company interests or policies, will be terminated as soon as the supervisor/manager and appropriate manager have concurred with the action. The employee is not eligible for severance pay.

### ***Layoff***

When a reduction in force is necessary or if one or more positions are eliminated, employees will be identified for layoff after evaluating the following factors:

- Company work requirements;
- Employee's abilities, experience, and skill;
- Employee's potential for reassignment within the organization; and
- Length of service.

The immediate supervisor/manager will personally notify employees of a layoff. After explaining the layoff procedure, the employee will be given a letter describing the conditions of the layoff.

The employee will receive at least two weeks advance notice of the termination date in addition to any unused scheduled and unscheduled time.

### ***Termination Processing Procedures***

The supervisor/manager must immediately notify senior management of the termination so that a termination checklist can be initiated. Senior management will direct and coordinate the termination procedure.

In cases where an employee owes money to the Company, the Company will make applicable deductions from the employee's pay in accordance with Federal and State Laws.

On the final day of employment, employees are responsible for returning any Company materials. This includes but is not limited to equipment, supplies, documents, data, Company records, keys, credit cards, or any other Company property.

## **Work Week**

Salaries are based on a 40 hour work week.

Specific workday and workweek hours for each employee will be determined by the appropriate department manager based on the operational needs of the Company. The Company will attempt to notify employees of any changes in workdays or workweek hours two weeks in advance of the effective date of any change.

Agencies may schedule required meetings. All employees are expected to attend the meeting unless they have prior management approval.

For calculation of pay and overtime the standard workweek is from Monday through Sunday.

NOTE: Non-exempt employees should not work overtime unless the overtime is approved in advance by the employee's supervisor/manager. Non-exempt employees who fail to obtain prior management authorization may be subject to disciplinary action, but not forfeiture of earned overtime compensation. Employees must keep accurate time records of all overtime hours worked and bring it immediately to the attention of their supervisor.

## **Pay Check**

Employees are paid every two weeks, 26 times annually. If a payday falls on a holiday, the employee will be paid on the preceding workday.

### **Pay advances are not granted.**

For your safety and convenience, Corrigan & Associates uses the Direct Deposit Plan. Under the Direct Deposit Plan, an employee's paycheck will be automatically deposited in the bank and/or credit union of his/her choice.

### ***Salary Deductions***

Corrigan & Associates is committed to ensuring proper wage payments and withholding deductions are made in accordance with federal, state, local and wage and hour laws. In the event an employee believes a deduction has inadvertently been made to his/her pay, the employee will need to contact his/her manager or payroll immediately. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed.

## **Overtime**

Overtime is paid to non-exempt employees and is calculated in accordance with federal and state wage and hour laws. Non-exempt employees who work in excess of forty (40) hours per week will be paid overtime at a rate of one and one-half times their hourly rate for all time worked in excess of 40 hours in any one workweek.

There will be times when the work load will require overtime and the manager may make it mandatory. All employees are expected to work mandatory overtime when requested. Mandatory overtime will be scheduled in advance whenever possible.

Non-exempt employees should not work overtime unless the overtime is approved in advance by the employee's supervisor/manager. Non-exempt employees who fail to obtain prior management authorization may be subject to disciplinary action, but not forfeiture of earned overtime compensation. Employees must keep accurate time records of all overtime hours worked and bring it immediately to the attention of their supervisor.

## Meal Periods

### *Meal Period*

The required lunch period for all employees is 30 minutes. Lunch periods may be assigned to you by your supervisor/manager. Lunch periods will be between 11:30 a.m. and 1:00 p.m. It is important that you leave your desk at that time and return promptly 30 minutes later. **Lunches are not to be eaten at your desk.**

## **Paid Time Off Policy**

Corrigan & Associates believes that employees should have opportunities to enjoy time away from work to help balance their lives. Corrigan & Associates recognizes that employees have diverse needs for time off from work. Corrigan & Associates has established this paid time off (PTO) policy to meet those needs. All time off for vacation, sick, or personal reasons has been combined into one allotment.

The benefits of PTO are that it promotes a flexible approach to time off. Employees are accountable and responsible for managing their own PTO hours to allow for adequate reserves if there is a need to cover vacation, illness or disability, appointments, emergencies or other needs that require time off from work.

PTO is not an earned benefit, meaning that the annual PTO grant is not a part of an employee's regular wages and will not be paid out upon termination.

Paid time off provided to employees for bereavement, jury duty, and holidays are in addition to those provided under this policy.

### ***Eligibility***

To be eligible for PTO, an employee must be a full time employee, scheduled to work at least 34 hours per week on a regular basis. The employee must be in an active pay status. Employees working less than 34 hours per week on a regular basis, on-call and temporary employees are not eligible for PTO.

### ***Availability***

New employees are eligible to take PTO after they have worked three consecutive months.

**Grant Amounts and the Program Year**

The amount of PTO granted to an employee is based on an employee's length of service with the Company, and the employee's scheduled workweek. The Program Grant Year is January through December. PTO not taken during the calendar year is forfeited.

PTO is granted annually. For ease of administration total annual balances, as noted in the chart below, will be reflected January 1<sup>st</sup> of each year.

<b>Years of Service</b>	<b>5 Day Workweek</b>	<b>4 Day Workweek</b>
*0 to1	10	8
2	11	9
3	12	10
4	13	11
5	14	12
6 to10	15	12
11	16	13
12	17	14
13	18	15
14	19	16
15 or more	20	16
<b>*New Hire Grants are listed below</b>		

**New Hires**

New hires, or rehires, will receive a pro-rated PTO grant based on the month in which they are hired. Granted time may be used following three months of active employment with the Company after appropriate approval from the supervisor has been obtained. The following schedule applies for new hires:

<b>Month Hired</b>	<b>5 Day Workweek</b>	<b>4 Day Workweek</b>
January, February, March	8	6
April, May, June	6	4
July, August, September	4	2
October, November, December	2	0

## ***Use of PTO***

Time taken under the PTO program is considered scheduled or unscheduled:

- PTO is considered scheduled when an employee submits a request for time off to their supervisor at least two (2) calendar days in advance.
- PTO is considered unscheduled if a request for time off is submitted without two calendar days advance notice. It is our expectation that employees will schedule time off whenever practical. Please refer to the Company Absence and Tardiness Policy.

It is important to note that the submission of a request for time off within the time frame considered as scheduled does not guarantee that the supervisor will approve the PTO request. PTO can only be approved as business and staffing needs allow.

If a Company holiday falls during an employee's scheduled time off with pay, he or she receives holiday pay. The employee's PTO balance is not reduced for that day. To be eligible for holiday pay, an employee normally must work the last scheduled day before and the first scheduled day after the holiday except for PTO time that has been approved in advance. Time off without pay is only permitted when there is no PTO balance and requires manager's approval.

The maximum amount of time an employee can take off at one time is based on the circumstances regarding the request, the business needs of the Company, the PTO balance available and final approval by the supervisor. Check with your supervisor for guidance in planning time off.

## ***Tracking of PTO***

- For full time exempt employees, the employee's manager is responsible for tracking the use of all PTO.
- For full time non-exempt employees, timecards are to be completed when PTO is used. Managers should also track to ensure accuracy.

## ***Borrowing Against Future Grants***

Employees may not borrow from future year PTO grants.

## ***Leave of Absence***

PTO must be used at the end of a paid disability leave of absence if an employee continues his or her leave of absence under the Family Medical Leave Act (FMLA), as governed by federal or state regulations. Employees taking leave for absences not covered by short-term disability or other state disability plans must use PTO during the absence, if PTO is available.

**The Company maintains the right to change, discontinue, add or otherwise alter this policy at any time.**

## **Holidays**

The annual holiday schedule will be posted in January of each year.

To be eligible for holiday pay, an employee normally must work the last scheduled day before and the first scheduled day after the holiday except for time off that has been approved in advance. An employee must be a full-time employee to be eligible for holiday pay.

## **FMLA – (Family Medical Leave Act)**

In accordance with the Family & Medical Leave Act (FMLA) of 1993, Family/Medical Leave is available to all employees who have worked for the Company for at least 12 months and who have worked at least 1250 hours in the past 12 months. This unpaid leave is available for up to 12 weeks in any twelve-month period. The Company's policy on FMLA is as follows: All eligible employees may take up to 12 weeks leave, using a combination of PTO and unpaid Family/Medical Leave within any twelve (12) month period for the following reasons:

- The birth, adoption, or placement of a child with you for foster care,
- To care for the serious health condition of a spouse (defined according to state law), child (including biological or adopted child, foster child, stepchild, legal ward, or other person under the age of 18 with whom you act in the capacity of a parent), or parent (including biological parents and other individuals who act as your parents, but not including parents-in-law),
- Because of your own serious health condition which renders you unable to perform any one of the essential functions of your job.

The determination of the 12-month period for purposes of calculating available leave will be made based on a rolling 12-month period (i.e. looking back twelve months from the date the leave is requested to determine how much leave has been taken in that period). Leave taken for the birth or placement of a child must be concluded within the one-year period beginning on the date of the birth or placement.

Employees taking a family medical leave of absence shall make a reasonable effort to schedule medical treatments so as to minimize any disruption to Company operations. If a serious health condition is anticipated, the employee shall provide at least 30 days written notice, if possible, prior to taking leave explaining the reason for the leave. If a serious health condition is not anticipated, the employee should make an oral request for leave at least 3 days prior to the leave, if possible.

For the purposes of this policy "serious health condition" means:

- An illness of a family member requiring home care. Family members include: spouse (as defined according to state law), child (including biological or adopted child, foster child, stepchild, legal ward, or other person under the age of 18 for whom you act in the capacity of a parent), or parent (including biological parents and other individuals who act as your parents, but not including parents-in-law).
- An injury, disease or condition that according to the medical judgment of the treating physician:
  - Poses an eminent danger of death:
  - Terminal in prognosis with a reasonable possibility of death in the near future; or
  - Any medical or physical condition requiring constant care.

Corrigan & Associates may require certification from a health care provider as to the need for the leave. For any serious health condition that is not life threatening or terminal, no family medical leave is allowed during any period of time when another family member is taking family medical leave or is otherwise available to care for the family member.

During the leave, the regular position of the employee shall be considered vacant for the period of the leave, and the employee will not be removed or discharged as a consequence of the leave. The Company will continue health care coverage for the employee during the leave and the employee will be responsible for his/her contribution.

At the conclusion of the leave period, the employee shall be restored to his or her former position or an equivalent job without loss of seniority or service credits accruing under any benefit plan as of the date the leave commenced. If the Company is unable to restore the employee to his/her former job or an equivalent job due to the Company's circumstances, the employee shall be reinstated to any position that is available and suitable. The Company is not required to discharge any other employee in order to reinstate the employee.

An employee who does not return to work at the end of his or her leave of absence will be considered to have voluntarily resigned from employment with Corrigan & Associates.

**NOTE: This policy will not conflict with any applicable state or federal medical leave laws.**

## **Return to Work**

As a joint protection to the employee and the Company, employees who have been absent from work because of serious illness or injury are required to obtain a doctor's release specifically stating that the employee is capable of performing his or her normal duties or assignments. A serious injury or illness is defined as one that results in the employee being absent from work for more than 2 consecutive weeks or one which may limit the employee's future performance of regular duties or assignments.

If the cause of the employee's illness or injury was job-related, the employee's supervisor/manager will make every reasonable effort to assign the returning employee to assignments consistent with the instructions of the employee's doctor until the employee is fully recovered. A doctor's written release is required before recovery can be assumed.

## **Continuing Education Time Off**

Each licensed employee will be provided one half (1/2) day paid leave for each four hours of classroom study necessary to secure their sixteen (16) credit hours of Continuing Education (CE) required by the State of Maryland. These CE credit hours, or part of them, can be secured on-line or at class. An employee must obtain his/her manager's approval to attend a formal class prior to enrolling in the class. The manager will ensure that an employee's attendance in a formal class will not place an undue hardship on the Company. Employees are not to participate in on-line classes during their regular scheduled hours but rather use their 1/2 day paid leave.

## **Bereavement Leave**

In the event of the death of an immediate family member (spouse, parents, grandparents, children, stepchildren, grandchildren, brother, sister, or spouse's parents) the employee and the supervisor/manager will determine the amount of time the employee will be absent from work. The maximum paid leave is 2 days, in addition to all other paid leave.

Leave for attendance at the funeral of a non-immediate family member or person with an especially close relationship may be granted without pay. The employee may use available PTO. The employee's supervisor will make the determination after consultation with the senior manager.

## **Jury Duty**

Corrigan & Associates will grant employees time off for mandatory jury duty or court appearances as a witness when the employee must serve or is required to appear as a result of a court order or subpoena. A copy of the court order or subpoena must be supplied to the employee's supervisor/manager when requesting time off.

The employee is entitled to full pay for each day of jury duty or service as a witness up to a maximum of ten days per year, in addition to any other paid leave. Employees called for jury duty are expected to report to work when the jury is dismissed, provided that one half or more of a working day remains. However, time off for court appearances as a party to any civil or criminal litigation shall not be compensated, and the employee must arrange for time off without pay or use PTO for such appearances.

## **Military Leave**

An employee entering active military service or required annual reserve training will be granted the required time to meet this obligation in compliance with all applicable federal and state laws. With exceptions and limitations, employees are eligible upon completion of military service to reemployment with the Company and certain other benefits in accordance with applicable federal and state laws.

The Company will grant such unpaid leave as may be required in order to enable its employees to comply with required activities.

An employee who needs time off for military or required annual reserve training should immediately notify his or her supervisor of the need for the leave.

## **Voting Policy**

Corrigan & Associates encourages all employees to exercise their right to vote. Employees are encouraged to use their own time for this purpose or to take advantage of polling hours prior to the beginning or following the end of your workday.

## **Insurance**

Corrigan & Associates makes available a group health insurance program for its employees. The cost of the plan is partially paid by Corrigan & Associates.

For specific questions on coverage of the programs, contact your manager.

### ***Eligibility***

1. The employee is eligible for coverage on the first of the month after thirty (30) days from the hire date. After 30 days, evidence of insurability is required or the employee must wait for the Company open enrollment period.
2. Dependents of the employee are eligible for participation in the group health insurance program at no cost to the Company.

## **Errors & Omissions Coverage**

E & O coverage is maintained by the Company and is covering both the agency and all employees. There is no cost to the employee. E & O coverage is meant to cover losses that occur because of an “error” or “omission” of an employee. Two or more incidents by an employee will result in disciplinary action up to and including termination.

Non-insurance errors made by an employee that result in charges to the Company such as NSF fees, will be paid by the Company. Two or more incidents by an employee will result in disciplinary action up to and including termination.

## **Employee-Incurred Expenses and Reimbursement**

Corrigan & Associates will pay all actual and reasonable business-related expenses incurred by employees in the performance of their job responsibilities. His or her manager must approve all such expenses incurred by an employee before the accounting department will make payment.

Expense reports are to be submitted and supported by evidence of proof of purchase, e.g., receipts. Expense reports are due in the appropriate department the last working day of each month.

All employee travel, educational assistance, mileage, and subsistence, must have a supervisor's/manager's approval. Employees are required to request approval in advance of expenditures whenever possible to ensure no delay in Company reimbursement. All expense reports are due in the appropriate department on the final working day of each month. Prior to being honored by the appropriate department, these reports must have the employee's signature and date and must be approved by the employee's supervisor/manager.

### ***Mileage Reimbursement***

For the convenience of the employee, when he or she desires to use his or her personal vehicle for Company business, all employees of Corrigan & Associates shall be reimbursed for Company-related business travel at the rate established at that time by the I.R.S. Use of a personal vehicle is never required by the Company and is discretionary on the part of the employee.

Travel expenses between the employee's home and the employee's assigned work location are not reimbursable. If an employee is required to travel from home directly to a third location on Company business and then to work, the Company will reimburse the employee for the difference between the mileage the employee normally drives to work and the total miles driven for business purposes.

Requests for reimbursement of business-related travel will be submitted to your supervisor/manager for approval on a standard Company expense report.

Reimbursement requests will include the following:

- Date of travel
- Beginning and ending odometer readings for each trip
- Travel destination
- Number of miles traveled on Company business
- The reason for Company travel

The expense report must be signed and dated by the employee and initialed by his or her supervisor/manager. The reports must be submitted to the accounting department.

The employee, in using his or her vehicle for Company purposes, assumes liability for his or her vehicle. All employees who desire to use their personal vehicles for Company business must sign statements verifying that they have a current driver's license and

vehicle liability insurance in at least the minimum amounts required by Corrigan & Associates.

### ***Travel Reimbursement***

This policy establishes the general guidelines and procedures to be followed when business travel is required.

- Travel-related expenses are to be detailed on the Company travel reimbursement form.
- Employees who prefer to use their personal vehicles for their convenience on Company business, including trips to the airport, will be reimbursed at the I.R.S. mileage rate, provided that the time and distance involved is reasonable under the circumstances.
- All parking expenses and highway tolls incurred as a result of business travel will be reimbursed.
- All air travel must be approved in advance by the employee's supervisor/manager unless unavoidable. All travel will be by coach class whenever possible. First class may be used when coach class accommodations are not available or when traveling with a customer who is traveling first class. The airline ticket receipt should be attached to the Company travel reimbursement form.
- Employees should request advance approval for use of a rental car at their destination. If a rental car is used, additional insurance should not be purchased because of our existing insurance coverage. A copy of the rental car agreement form must accompany the travel reimbursement form.
- Employees should select moderately priced lodging convenient to their destination to minimize time and expense. A detailed receipt from the hotel or motel must accompany the reimbursement form unless such is unavailable, in which case a credit card receipt is acceptable.
- Employees must submit receipts for meals with the reimbursement form. Reasonable tips, when paid by the employee and noted on the receipt, will be reimbursed.
- Travel reimbursement requests are due in the accounting department on the last working day of each month.

## **Political Activities**

In recognition of its responsibilities as a business citizen, Corrigan & Associates, encourages its employees to accept the personal responsibility of good citizenship, including participation in civic and political activities, in accordance with their interests and abilities.

Corrigan & Associates accepts without reservation, the basic democratic principle that all employees are free to make their own individual decisions in civic and political matters. Therefore, no employee's status with the Company will be affected, in any way whatsoever, because of participation or non-participation in lawful civic and political activities.

Participation in civic and political activities is considered to be a personal matter and, as such, is generally to be carried on outside of normal working hours. No political activities or solicitations will be carried on within Company premises.

Political activities are defined for purposes of this policy as activities in support of any partisan political issue or activities in support or, or in concert with, any individual candidate for political office, or a political party, which seek to influence the election of candidates to federal, state, or local offices. The definition includes employees who are or may be candidates for political office.

The Company reserves the right to deny time off for political activity where the activities, in the opinion of the Company, would unduly interfere with the employee's fulfillment of any obligations to the Company.

## **Kitchen - Break Room**

Corrigan & Associates provides a kitchen-break room for the benefit of its employees. Employees shall be responsible for the general clean up of the area, including the washing of personal dishes and utensils. All trash should be disposed of in the trash container. Personal items should be removed at the end of the week.

## **Emergency Closings**

Except for regularly scheduled holidays, Corrigan & Associates will be open for business on Mondays through Fridays during normal business hours. The Company recognizes that circumstances beyond its control, such as inclement weather, national crisis, or other emergency, do occur. On such occasions, the Company may close for all or part of a regularly scheduled workday

In such event, the Company will endeavor to notify all supervisory personnel for the purpose of contacting employees. Employees may also contact their supervisor/manager or Company offices, or they may call our Agency Weather Hotline at 301-623-3140.

## **Parking**

Employee parking is available on a first-come, first served basis in designated areas of Corrigan & Associates parking lot. No employee parking is permitted at any time in spaces reserved for visitors.

Employees are urged to carpool to minimize congestion, assure an adequate number of parking spaces for all employees, and conserve energy. Under no circumstances will the Company be responsible or liable in any way for property damage to employee-owned cars while parked on Company parking lots.