



Employee Policies

&

Procedures Handbook

Effective December 1, 2022

Spectrum Enterprises Inc & Spectrum Seminars Inc

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## POLICIES AND PROCEDURES OVERVIEW

### Company Name, Location and Fiscal Year

The following company policies apply to all the full-time and part-time paid staff employed by Spectrum Enterprises, Inc. and Spectrum Seminars, Inc. (hereinafter referred to as 'Spectrum' or the 'company') in Maine, Massachusetts, Maryland, Michigan, Louisiana and any other locations and states into which the company may expand. The fiscal year runs from 1/01 to 12/31.

### Policy Introduction

The nature of our business depends upon qualified, professional staff who are well informed and guided in their performance toward excellence. Because Spectrum success depends upon high quality performance of staff duties, human resource management is one of our most important responsibilities. To define success clearly, to govern staff behavior, and to protect fairness and equity in our workplace, we have outlined the following policies to guide staff performance and conduct. Company policies and human resource management are governed in part by law and in part by Spectrum goals and values.

A company Policy and Procedures Manual serves as a management and leadership tool providing information and appropriate actions for dealing with management questions and concerns. The policies contained herein are intended to: conform to current legislation; be consistent with the benefits and insurance programs available to Spectrum employees; provide consistency and standardization; set high standards for a successful organization; and to encourage an employer/employee relationship built on candor, respect, and most importantly, the achievement of Spectrum end results.

The policies contained herein provide guidelines for decision-making and are not intended to create a contract between Spectrum Enterprises and its employees. These policies do not constitute a legal document.

For more information on any of the policies or procedures, contact Spectrum Management or your Supervisor.

### Scope of Policies

The policies and practices contained within this manual are not, and do not constitute an employment contract and are subject to change with or without notice. Although the policies and practices attempt to address many of the duties and responsibilities, which flow from the employment relationship, they cannot address all conceivable issues that may arise. Each staff member is responsible for adding revisions to their Policy and Procedures Manual when they are distributed.

All employees of Spectrum Enterprises and its subsidiaries are employees at will. It is understood by the company and the employee that employment is "At Will." This means that the parties are free to unilaterally terminate the relationship without cause or notice.

- The employee is free to resign from his/her position without cause or without having to complete a specified period.
- The employer is free to terminate an employee for any, or no, reason except those circumstances which are protected by the equal opportunity employment policy.

The phrase 'Spectrum management' as used in these documents refers to the owners of the company.

Employee failure to comply with any policies or procedures will result in disciplinary action. Spectrum management will notify staff in a timely fashion when their actions are in violation of company policies.

## EQUAL OPPORTUNITY EMPLOYMENT AND NON-DISCRIMINATION

### Policy Statement

It is Spectrum's policy to provide equal employment opportunity for all applicants and employees. Spectrum does not discriminate on the basis of race, color, religion, gender, natural origin, ancestry, age, physical disability, mental disability, medical condition, marital status or sexual orientation. Spectrum makes reasonable accommodations for disabled employees. This nondiscrimination policy applies to all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, layoff and recall, social and recreational programs and other terms and conditions of employment. Any employee having questions regarding this policy should discuss them with their supervisor or Spectrum management.

### Procedure

Internal promotion or transfer between positions within Spectrum are made with regard to qualifications, experience, and performance evaluation and without regard to the protected classes noted above.

Training and staff development opportunities are made with regard to job requirements, training needs assessments and current skill deficits and without regard to the protected classes noted above.

Layoffs, downsizing, or work reductions are made with regard to Spectrum needs and financial health and are made without regard to the protected classes noted above.

### Roles and Responsibilities

It is the responsibility of supervisory staff and employees to give this policy full support and to help create a work atmosphere that is conducive to equal opportunity employment and non-discrimination policies.

## STAFF RECRUITMENT

### Policy Statement

The goal of staff recruitment is to identify and secure the best candidate who is both qualified for the position duties and represents a good fit with Spectrum's mission and operating principles. In addition, recruitment practices must be consistent with applicable law.

### Procedure

The Spectrum management has the authority to approve a vacancy for recruitment. An up-to-date job description will be available when the position is posted to allow candidates an opportunity to fully understand the list of job duties.

### Job Postings

Positions are advertised in a wide variety of venues including but not limited to web postings, newspapers, college campus postings, trade publications, employee word-of-mouth, industry contacts, search firms, etc.

#### Interview Process

The interview process is custom designed to each position opening but the overall goal is to review candidate qualifications, ensuring that they possess the minimum qualifications as well as to discover their fit within the company.

#### Roles and Responsibilities

It is the responsibility of Spectrum management and any employees involved in recruitment to give this policy full support.

### HIRING NEW STAFF

#### Policy Statement

Because Spectrum invests considerable resources in new staff, the decision to offer a position to a candidate is a serious matter requiring careful thought. The following procedures are the foundation for a successful match between new employees and our workplace and the achievement of company long-term goals.

#### Employment References

Employment references are required for any candidate for whom an offer is planned. References are checked before a job offer may be made. No fewer than three (3) personal references who are not related to the applicant and are not former employers will be contacted to learn about the character, habits and reliability of the individual. References from an applicant's previous employers will be obtained only after the candidate signs a release confirming the right of the former employer to provide a reference without fear of liability.

#### Background Investigations

Spectrum conducts criminal background checks on all prospective employees.

If information is found or disclosed indicating that the employee may pose a threat or risk to staff safety, or the well-being of the company, or if an employee is found to have misrepresented or falsified their resume or credentials, an offer may be withdrawn. In the case of an employee already employed with the company, the employee may be discharged immediately.

#### Employee Classifications

Spectrum compensates employees who are entitled to overtime under the Federal Fair Labor, Standards Act and applicable state law (non-exempt). All employees are considered non-exempt unless their job responsibilities are such that they fall into a category of employees that is exempt from the overtime provisions of federal and state law (exempt). Federal and state wage and hour law exempt bona fide executives and supervisors, administrative employees, professionals, and outside salespersons from the wage and hour overtime pay provisions.

An employee is exempt if their primary duty consists of the performance of work which requires knowledge of an advanced type in a field of science or learning customarily acquired by a prolonged course of specialized intellectual study, or which involves teaching at an established school, and which requires the consistent exercise of discretion and judgment. The duties of a compliance monitor would classify them as exempt.

An employee is non-exempt if their primary duty does not fall within the exempt definition is compensated on an hourly basis and provides for additional compensation for hours worked in excess of

forty (40) hours per week. All employees are hired for an unspecified duration and these classifications do not guarantee employment for any specific length of time.

#### Non-Exempt Employees

All non-exempt employees are entitled to one and one-half times their salary, on an hourly basis, for each hour worked in excess of 40 hours per week (Monday through Sunday). All non-exempt employees are informed of the regular workweek and no overtime may be paid unless approved by Spectrum management.

#### Exempt Employees

All exempt employees have an obligation to complete all of their duties in a professional manner without regard to the number of hours worked in excess of forty (40) hours. Exempt employees are not eligible for overtime or comp time.

#### Full Time / Part Time Employees

A regular full-time employee is one who is assigned to work the normal weekly schedule of forty (40) hours per week. A regular part-time employee is one who is assigned to work less than forty (40) hours per week.

#### Salary Offer and Employment Contract

Employment offers and or contracts are formally written, and signed by at least one member of management.

#### New Hire Paperwork

Candidates are asked to bring proper identification, based on applicable federal and state forms, to their first day of employment. New employees must complete all applicable payroll forms. Benefits paperwork should be completed within the timeframes required for each benefit's effective date. The company also has additional informational forms for new employees to fill out that are for internal use only.

#### New Employee Orientation

Within the first 5 days of the first day of work, new employees will be given this handbook (receipt of which is signed by the employee and the benefits administrator) and Spectrum's overall policies and office procedures. This orientation will provide a firm foundation for understanding Spectrum business goals, products and services, and the logistics of Spectrum business procedures.

Within the first three months, new employees will be given a full explanation of the specific responsibilities listed in their job description with an opportunity to attend trainings, job shadow more experienced staff, or other appropriate training sessions as recommended by the employees immediate supervisor.

New hires will also be required to either attend or watch any videos for mandatory trainings that the company is required to give all or some employees.

#### Equipment for New Compliance Analysts

The following should be provided to new hires after the proper trainings:

- C3P Manual
- Fair Housing Law Manual
- Online link to HUD 4350
- Online link to IRS 8823 Guide

#### Paid and Unpaid Time Off for New Employees:

- Paid Time Off (PTO) accrual for new employees begins during the employee's first payroll cycle; apportionment will be made if the new employee starts beyond the first day of the payroll cycle.
- Paid Holidays are available to employees immediately upon employment.

#### Trial Period

Every employee begins a three (3) month Trial Period, during which the employee is evaluated continuously. In the event an employee's job performance is not satisfactory and termination of employment becomes necessary during the introductory period, no PTO time will be credited and no remuneration will be given. PTO will be deducted from the final paycheck from an employee who is separated from the company or who voluntarily resigns prior to completion of the Trial period and has borrowed PTO, in advance, through prior agreement.

#### Roles and Responsibilities

It is the responsibility of Spectrum management as well as the new employee, to give this policy full support and to help create a work environment where employees are given the information they need to be effective.

#### GINA

Spectrum hiring practices conform to the Genetic Information Nondiscrimination Act of 2008.

### PERSONNEL FILES AND RECORDS

#### Policy Statement

Official employee personnel files containing confidential information are maintained by the benefits administrator and Spectrum Management and are available to authorized staff only.

#### Procedure

A personnel folder is maintained for each employee for the duration of his/her employment. Following termination, files are retained for an indefinite period of time, but not less than 7 years.

Information collected and maintained in each employee's personnel file may include:

- Employment application and/or resume
- Job Description – initialed by the employee
- New employee reference checks
- Signed receipt for required orientation materials
- Copy of valid driver's license
- Copy of benefit enrollment forms (all that apply)
- W-4 and various tax forms
- Signed performance evaluation forms
- Direct Deposit authorizations
- Emergency contact information
- Copies of correspondence sent by or to the employee
- Evidence of training certifications or courses passed

Signed I-9 forms are kept by the benefits administrator. Access to personnel files is controlled by Spectrum Management and is limited to Spectrum management. No personnel files may be removed from the office. Employees may review any material in their personnel file by making an appointment

with Spectrum management. The employee will be provided with a copy of all or part of his/her own personnel file.

#### Work References for Former or Terminating Spectrum Employees

All work reference requests for former Spectrum employees or employees in the process of terminating with the company are directed to Spectrum management. No other Spectrum employee may provide a work reference for former coworker about the work done for Spectrum. Request for references will be honored only when accompanied by a written authorization from the employee. The information provided to a former employee's prospective employer is limited to name, position held, employment date, and eligibility for re-hire.

#### Work References for Current Spectrum Employees

Spectrum management provides salary confirmation in the case of a credit check if requested directly by the employee in question.

#### Roles and Responsibilities

The administration of this policy is the responsibility of Spectrum management.



## EMPLOYEE BENEFITS

### Policy Statement

Spectrum offers a package of employee benefits in order to fully compensate the hard work of our employees, but also to remain competitive with the practices of employers in our competitive marketplace. The company reserves the right to amend, modify, or reduce the benefits provided, or to terminate any of these plans at any time. Any amendment, modification, reduction or termination may be made, without prior notice to participant, except as required by law.

Paid and unpaid time off is covered under the policy *Paid and Unpaid Time Off*.

### Procedure

Spectrum offers the following insurance benefits to all full and part-time employees working 20 or more hours per week; however, these benefits are subject to change based on company profitability.

PLAN TYPE	ELIGIBILITY	PREMIUMS	UPON TERMINATION
Medical Insurance	DOH + 30 days + 1 <sup>st</sup> of month	Employer paid premiums for employee only dependent upon each applicable plan year – dependents are 100% employee expense	Coverage ends at the end of the month of termination date; COBRA is optional
Dental & Vision Insurance	DOH + 30 days + 1 <sup>st</sup> of month	Employee/dependent coverage is 100% employee responsibility	Coverage ends at the end of the month of termination date; COBRA is optional
Life Insurance – 1x salary	DOH + 30 days + 1 <sup>st</sup> of month	Spectrum pays 100% of this premium	Coverage ends on termination date
Long-Term Disability	DOH + 1 <sup>st</sup> of month	Spectrum pays 100% of this premium	Coverage ends on termination date
Short-Term Disability	DOH + 1 <sup>st</sup> of month	Spectrum pays 100% of this premium	Coverage ends on termination date
401(k) Plan	After one year of employment	Spectrum may fund employee's account to 3% of gross compensation	Match still funded for year of termination if employee was eligible

DOH (date of hire) + 30 days + 1<sup>st</sup> of the month

Example: DOH = January 15 then, benefit would start March 1<sup>st</sup>.

Important insurance plan provisions such as benefit limitations, premiums, and other limits, are covered by the insurance carrier plan documents and the 401(k) plan documents. Disputes with any insurance plan carriers or sponsors must be resolved by the employee with the carrier in question according to the applicable complaint procedure. Premiums for each of these plans are set by the insurance carrier/sponsor. Spectrum covers a portion of premiums and employees pay a portion. All employees are provided with a schedule of the premiums for each of these plans along with how much they are required to pay through payroll deductions.

#### Non-insurance benefits

- Free parking
- Company vehicle (schedule permitting) for use when traveling to clients or with management permission

#### Roles and Responsibilities

Administration of benefits plans is the responsibility of Spectrum management. Spectrum management is responsible for ensuring new employees are given the opportunity to enroll in benefits plans as soon as they are eligible. Employees are responsible for completing insurance enrollment forms in a timely fashion according to the insurance carrier's specifications. Insurance carriers and sponsors are responsible for enforcing their policy limitations and requirements.

If the employee needs to make any changes to their benefit options during the plan year (through a qualifying event or other eligibility change), the employee MUST let management know and work with the benefits administrator to enact the change. Employees cannot make changes to their benefits without the authorization of Spectrum.

#### HOURS

##### Policy

Spectrum corporate office hours are Monday-Friday from 8am – 5pm EST. Employees are given a one-hour lunch and are required to abide by these hours unless Spectrum management has granted prior approval. All variations of this workweek will be approved on a case-by-case basis.

The above schedule is subject to change by Spectrum management without notice.

All employees are expected to perform their duties in the corporate office (i.e. not from a remote location) unless Spectrum management has approved the alternate work location. Should an inclement weather situation arise, Spectrum management may approve employees to work from home. Spectrum management may also approve a work from home situation due to a health condition.

#### PAID TIME OFF (PTO) AND HOLIDAYS

##### Policy Statement

Spectrum offers a variety of paid time off with the desire to both reward employees for their hard work and for other personal matters. Spectrum reserves the right to amend any of the following paid and unpaid days/hours either to increase, modify, or decrease the amount of time allowed.

Employees are required to prepare their timesheet using the employer's software for payroll processing. Employees MUST have their timesheets completed and approved by day and time designated by the benefits administrator. Failure to do so can result in partial pay. Full time employees are expected to have 80 hours per payroll cycle accounted for; part-time employees are expected to enter the actual numbers of hours worked or other arrangement based on their agreement with management. Accrual calculations for paid and unpaid time off is covered in the policy *Hiring New Staff*.

To request PTO, the employee must:

- Discuss the time off that you need with your supervisor and get approval from that person(s);
- Go into the PTO system and request the day(s) off;

- In the comments field for the PTO, enter a note 'OK by XX' where XX are the supervisor's initials – employees can also still add a comment about why he/she needs the time off;
- Submit the request

The benefits administrator will then approve the PTO, and once approved, the employee will receive an email confirmation. The approved dates are automatically entered into the employee's timesheet. If the employee later does not need the PTO, he/she must inform the benefits administrator so that an adjustment can be made to the timesheet.

Any employee found to have intentionally under recorded paid time off may be subject to disciplinary action that may include repayment of days taken but not recorded and/or dismissal. An employee's approval of their timesheet is acceptance of their accountability, and employee will be held liable for any false reporting.

#### Paid Time Off (PTO)

Both Exempt and Non-exempt employees hired after February 20, 2020, accrue PTO based on the following years of service schedule:

0 - 4 years 18 PTO days (144 hours) per full year  
 5 - 9 years 23 PTO days (184 hours) per full year (hired before 02/20/20 additional 6 days)  
 10+ years 28 PTO days (224 hours) per full year (hired before 02/20/20 additional 4 days)

Increases in accrual amounts start with the payroll cycle in which the employee's anniversary date falls. Part-time employees accrue PTO based on the years of service and the proportion of hours they work to an 80 hour pay cycle. Holiday pay is also calculated for part-time employees in this manner, based on their regular part-time workweek. If a part-time employee also requests the same time off as a full time employee, the full time employee has priority.

At the discretion of their immediate supervisor an employee may be allowed to take PTO in excess of their accrual resulting in a negative accrual balance. In no circumstances may an employee exceed 40 hours of negative balance.

If an employee terminates employment with a negative PTO balance, the negative equivalent dollar amount will be deducted from the final paycheck. Any unused PTO accrued at termination will be paid to the employee as required under state law.

No more than two consecutive weeks of PTO may be taken at any one time unless an emergency or special permission from supervisor. Holidays falling within the period of PTO are not considered PTO time.

Requests for PTO in excess of 2 days must be made to Spectrum management at least one month in advance of the time off to allow the supervisor to make coverage plans. Exceptions are made for illness, emergencies, and, at the discretion of the immediate supervisor, or periods when the workload is diminished.

Spectrum does not require that an employee use all of their earned PTO in the employee's fiscal year (i.e. can carry PTO over). However, a the PTO bank will be maxed at 240 hours, and when an employee reaches that balance, no more PTO will be added into the balance. Employees do have the option, with the approval of management, to take some of their PTO bank as pay, subject to the applicable payroll rules.

Employees are allowed to make up 2 work hours per day by coming in early, working through their lunch, or staying late for an appointment that can't otherwise be scheduled during a work day instead of using their PTO. Any time in excess of 2 hours must be charged to PTO for that day. All employees must notify their supervisor, the benefits administrator, and the operations specialist of their planned absence.

#### Paid Holidays

Spectrum celebrates 9 paid holidays each full calendar year. The company will be closed on the following days:

- |                              |   |
|------------------------------|---|
| ▪ New Year's Day             | January 1 <sup>st</sup>   |
| ▪ Martin Luther King Jr. Day | 3 <sup>rd</sup> Monday in January   |
| ▪ President's Day            | 3 <sup>rd</sup> Monday in February  |
| ▪ Memorial Day               | Last Monday in May  |
| ▪ Independence Day           | July 4 <sup>th</sup> (July 3 <sup>rd</sup> if Sat; July 5 <sup>th</sup> if Sun) |
| ▪ Labor Day                  | First Monday in September   |
| ▪ Thanksgiving Day           | Last Thursday in November   |
| ▪ Friday after Thanksgiving  | Day after Thanksgiving  |
| ▪ Christmas Day              | December 25 <sup>th</sup>   |

In recognition of diverse cultural, social, and religious backgrounds, employees may work any of these holidays to switch with a personal or religious special event with advance notice to Spectrum Management.

#### Paid Bereavement Days

All employees may use up to 3 days of company paid leave for the death of the employee's immediate family (parent, child, sister, brother, wife, husband, or life partner); 2 days paid leave for grandparents/child; 1 day for other lineal relatives.

When using bereavement days, employees must notify the Spectrum management before the start of work for that day that he/she will not be in attendance with information regarding when the employee will return to work. Notification by company voice mail, cell phone voice mail, or email to company email address is adequate.

#### Inclement Weather

Spectrum does NOT close the office due to inclement weather. Employees are encouraged to make an independent decision regarding their own safety and whether they should travel to work on a given storm day. Employees may use PTO if they have unused supply or may take this day without pay. This must be fully recorded on the employee's time sheet at the end of the pay period.

There are certain circumstances where Spectrum may allow employees to work from home due to severe weather conditions. This decision is typically made during a work day for the next business day.

## STAFF CONDUCT AND DRESS CODE

### Policy Statement

Spectrum's goal is to maintain a professional workplace that enhances the achievement of corporation end results as well as employee satisfaction. A professional workplace atmosphere is one where there is a sound balance of respect for the company, its mission and property, for customers, and for each employee individually. The conduct outlined in this policy focuses on prohibited behavior/actions in order to provide clear guidance to employees in advance. The prohibited behavior/actions outlined herein represent the most common issues but Spectrum management reserves the right to define any behavior considered offensive or substandard and their decision is final. There are two matters requiring separate policies because of their importance: *Harassment and Sexual Harassment* and *Drug-free Workplace*. They should be read to fully understand prohibited staff conduct.

### Attendance

Employees are expected to arrive at work at their scheduled start-time, company meetings, scheduled client meetings, conferences, or any other Spectrum-related activities or events. Employees who arrive late will be warned and will be expected to amend their actions immediately.

In the event of illness or any other unforeseen events that result in late or no arrival, employees must notify the following people, through either phone, company email, or text:

- Benefits Administrator
- Vice President
- Direct Supervisor and/or Vice President

Texting throughout the workday is NOT an acceptable method of communicating with supervisors, co-workers and clients. Exceptions to this apply when the employee or recipient is not in the office or has no other means to communicate. Any formal requests by the employee for time off, workload adjustments, or any other grievances should be made in person or through company email.

### Safety

Employees are expected to maintain personal safety and that of clients, when possible. Employees who feel either they or company clients are unsafe for any reason, should take immediate, reasonable safety measures and, as soon as possible, seek the consult of his/her supervisor for further action. An employee traveling on company business who feels unsafe or in danger when entering a unit or project should not proceed. The inspection should be rescheduled, if necessary.

Employees are expected to safely operate company equipment and vehicles. Safe operation means consistent with laws, regulations, and rules as well as consistent with manufacturer instructions.

Any Spectrum employee who witnesses or observes any other Spectrum employee engaging in behavior or action judged to be in conflict with company safety guidelines, is required to report this clearly and immediately to Spectrum management. Employees should report ANY damages to company property immediately to management.

### Confidentiality

Employees are expected to maintain confidentiality with respect to company decisions and actions, proprietary information, employee performance and discipline and other matters that could reasonably be considered as sensitive. Employees must consider information gleaned in discussions with his/her immediate supervisor as confidential unless directed to share this information with others.

Monitoring Division employees are not allowed to discuss any property or findings with anyone without clearing through Spectrum management. Information will be given to no other source, even if they are associated with the Owners unless the employee has written permission to do so. This includes the management companies. For our State Contracts, information is only provided to the owner. There are often many entities involved with a property but information is provided only to the Owner for distribution as they determine.

#### Dress code

Employees must maintain professional, but relaxed business dress at all times during work hours. Clothing must be neat and presentable. Jeans are acceptable but must adhere to business casual standards. Please treat office attire as if there were incoming clients each business day. Provocative or sexually explicit apparel is prohibited.

The following attire is not considered professional attire and will be addressed immediately: T-shirts or jeans that are torn, stained, or have logos on them, and sweatpants. An employee may be asked to return home and change if any of the previously mentioned items are worn to work.

#### Travel Dress Code

While traveling on company business and when meeting with clients or while working on their property, it is recommended, but not required that men wear ties. Jeans are not allowed while traveling on corporate business – no dressing down while on the road.

#### Non-smoking workplace

In order to provide a healthier workplace environment, smoking is prohibited:

- On all Spectrum properties, either owned or rented
- In Spectrum vehicles
- In any vehicles where other, non-smoking Spectrum employees, or clients are present
- While meeting with clients
- While working on client property

No cigarette, pipe, or cigarette remnants or ashes are to be left on Spectrum grounds or client properties, by employees. Violation of this policy may result in disciplinary action, up to and including dismissal.

#### Professional Work Relationships

Employees are expected to build and maintain professional work relationships with colleagues in the workplace based upon respect, integrity, candor, and sound business practice.

#### Code of Professional Conduct

Spectrum employees are expected to operate lawfully and ethically with respect to clients, their records, reviews and general operations. Employees may not willingly or knowingly misrepresent facts, conceal important information, or otherwise controvert the legal obligations of Spectrum Enterprises or their employees.

### Roles and Responsibilities

It is the responsibility of employees to read and understand this policy and to give it their full support. It is the responsibility of Spectrum management to identify conduct that does not comply with this policy and notify staff immediately.

### Fragrance Free Workplace

In order to protect employees and clients that may have a fragrance sensitivity employees are urged to keep artificial fragrances at a minimum.

## PERFORMANCE EVALUATIONS

### Policy Statement

Spectrum relies on the work of professional staff, performing technical work, in a field with a substantial orientation and training period. As an industry leader, our quality standards are high. One of our most important management programs is the Performance Evaluation. Spectrum's performance evaluation is based upon job content, work results, and building strong client relationships. Performance evaluations are ongoing. They take place every day whenever immediate supervisors observe, evaluate, and provide feedback to subordinates. Our annual process provides important documentation, reviewing the year's performance and planning for the year ahead.

### Procedure

Each new employee is given a copy of the job description detailing their assigned duties. New employees' performance is evaluated continuously during the Trial Period, first three (3) months of employment. During this time, the supervisor ensures that orientation and trainings are carried out as a new employee's main job is to learn, observe and practice. A peer mentor may be assigned for job-shadowing purposes. Just before the end of the Trial Period, the supervisor meets with the employee to discuss progress and job fit.

After the Trial Period, each employee's performance is evaluated continuously by review of their written reports, correspondence, client comments, their success in mandatory trainings, the maintenance of contact with their supervisor, and the observation of peers and supervisor.

### Annual Documentation Process

At least annually, the employee and supervisor meet for an annual performance review using the company performance evaluation form. The reviewer (supervisor) and employee take the form in advance and arrive at their own informal ratings of the employee's performance. The reviewer and employee then meet to discuss the ratings. This meeting allows for privacy, no interruptions, and an adequate length of time to complete the discussion. One or two hours are adequate for a normal, annual review - shorter if it is a three (3) month Trial period review of a new employee. During this conference, the employee is rated in each job accountability area. The first step is for the supervisor to elaborate on what he/she considers to be an acceptable level of performance using examples. Employee strengths and weaknesses are identified along with a training plan for the upcoming year. The employee may provide information to support the ratings he/she believes is inaccurate. The purpose of this discussion is to reach a mutual understanding of the level of performance the employee achieved but the final review rating is the judgment of the supervisor. The performance rating is noted and both the employee and supervisor sign the form. Employees who disagree with their evaluation may attach written comments of any length.

#### Ratings Explained

MEETS EXPECTATIONS/ACCEPTABLE: Meeting performance expectations means that the position is being performed at an acceptable level, by an adequately trained employee who possesses the necessary training and personal attributes. It is the level of performance for a reasonable individual with adequate training and experience. In a field where attention to detail, is the nature of the work, this attribute would be expected in an employee who is qualified for the position. For example, a reasonably qualified Monitor is expected to pay particular attention to punctuation, phrasing, spelling and the overall quality in written documents. This would be indicative of acceptable performance for this position.

Acceptable performance does not mean “mistake-free” results. It is up to the supervisor/evaluator to judge whether the mistakes are a product of the normal learning process, or shortcomings that indicate an inability to perform at an acceptable level.

#### EXCEEDS EXPECTATIONS/BY A WIDE MARGIN

Exceeding expectations in job performance is beyond what one would expect for the adequately trained, normal employee. It is typically seen with a small percentage of the work force who seems to glean more from a given experience than others, learns faster, and produces both a greater volume of work and work of greater quality than others. An “exceeds” performance does just that. It exceeds what you would think a reasonably experienced, qualified employee would do. Some organizations do not have an “exceeds” employee. Just because one is the best of a group of performers, does not mean that he/she exceeds expectations by a wide margin. It is up to the supervisor/evaluator to rate the performance according to company expectations.

#### DOES NOT MEET EXPECTATIONS

An employee who does not meet expectations over the long term will likely be dismissed or transferred to a position for which they are better suited. New employees are expected to be rated “does not meet” in areas where they are not fully trained. During the probationary or learning period is the only time an overall rating of “does not meet” is acceptable.

Accountability is rated individually. The overall rating is a subjective compilation of all the ratings. Accountabilities are worded as acceptable, measurable end results. Occasionally employees get the desired results but in doing so interfere with the good performance of peers through intimidation and criticism. This will be considered in the overall rating.

#### Roles and Responsibilities

Spectrum supervisors and employees are responsible for giving this policy support. Supervisors evaluate employees and employees participate in the performance conference.

### SALARY ADMINISTRATION

#### Policy Statement

Spectrum salaries are set according to a combination of job content and market values and are confidential.

#### Procedure

Employee salaries are reviewed on an annual basis on a schedule set by Spectrum management, not related to employee start date. Normally the reviews are scheduled for the month of June.



The company benefits administrator maintains time sheet and benefit records; any changes in employee information such as last name, address, telephone, or withholding exemptions along with effective date must be sent in writing to the benefits administrator as soon as possible when the change is known and any applicable appropriate forms should be completed.

Employees are cautioned to ensure that funds are available before drawing checks.

#### Roles and Responsibilities

It is the responsibility of Spectrum management to administer this policy.

### STAFF TRAINING AND DEVELOPMENT

#### Policy Statement

The nature of Spectrum business requires significant technical training and building experience by performing job duties under the supervision of more seasoned staff. The company provides access to a wide variety of technical trainings and conferences. It is the intention of the company to reimburse instruction and training directly related to employees' job responsibilities. Spectrum management is the sole authority on whether training is related to work assignment.

#### Procedure

Employees will be informed of all mandatory training programs and will be expected to give this opportunity and material their full attention. These trainings are offered at no cost to the employee. Trainings are offered at various times and locations to allow employees to make arrangements to attend. Continued employment depends upon a certain level of proficiency with this training material.

#### Roles and Responsibilities

It is the responsibility of Spectrum management, and the new employee to give this policy full support.

### TRAVEL ON COMPANY BUSINESS

#### Policy Statement

The nature of Spectrum business requires that employees travel on company business. With staff members away from the office, several steps must be taken to ensure the smooth and orderly conduct of business, both inside and outside the office, at all times. Accurate, complete and ongoing communication is necessary to maintain our high work standards and prevent problems or issues among clients and employees.

#### Procedure

Compliance Monitors and Analysts must complete the below before going 'on the road':

- Prepare a written travel itinerary including: dates at each site, location, contact persons, phone numbers, number of files/units being reviewed, and lodging information with phone numbers.
- Ensure that you have all the equipment necessary to conduct the inspections including flashlight, accessibility guide, walking stick—try to carry with you for unit inspections or have staff assist in carrying and using.
- Notify Spectrum management if you will not have your cell phone with you.
- Review the new inspection standards.
- Get pre-approval from Spectrum management for hotel expenses exceeding \$200/night.
- Prepare your automated files as instructed in company procedures.
- Modify your voicemail message to let people know what days you will be out of the office and that you will check messages each day and respond as soon as you can.

### Communication While on the Road

Spectrum management must be informed of any communication Monitors have with clients (state or private), including any client or tenant complaints, compliance issues or problems, computer/technology issues needing resolution, or any other problems that may arise. If Spectrum management is not available by phone, Monitors should leave a detailed voice mail immediately.

### Ensure Quality Monitoring (Monitoring staff only)

Monitors are expected to be professional and appropriate with clients, cordial and friendly, and keeping conversations to a minimum to allow efficient monitoring of properties or files. Monitors should wear their company badges when performing inspections.

Produce digital photographs of each property (2 or 3) with at least one exterior shot that includes the project sign or identifier, and pictures identifying all unusual situations.

Be sure to properly identify LIHTC units for file reviews and inspections. Since the same units must be inspected for file reviews and physicals, be sure the proper units can be accessed for the physical inspection. Any units substituted for the physical inspection must have a file review too.

Inspection forms—Enter the proper state agency name in the heading. Edit Name of property, Mgmt company info, etc., for each property. Enter correct unit numbers and BIN numbers when recording findings and citing violations.

24-hour Emergency Repair List is to be used at sites that have those particular issues - be sure to have these forms on hand.

In case a computer malfunctions, always take file review checklists, worksheets and a calculator.

Notify sites when there will be a change in time of arrival. If using your own cell phone for business calls, the company will reimburse the expense.

### Staff Conduct

Staff conduct must be consistent with the following Spectrum policies:

- Staff Conduct
- Company Property
- Drug-Free Workplace
- Harassment and Sexual Harassment
- Information Technology and Computing Standards

### Automated System Requirements

When possible, audits with units/tenants should be entered in the software on the master database prior to making the clone to take on the road. If two monitors will be working on the file audits at one site, it is absolutely necessary to enter the audit on the master before the monitors make clones-auditors must then work in different BINs to avoid overwriting the other person's audit. Only when monitors are auditing separate properties is it possible to create audits from scratch when on the road.

### Travel Expenses & Reimbursement

Spectrum employees are permitted to reserve hotel rooms for under \$200 per night and to spend up to \$75 per day for meals on overnight travel and \$50 per day for meals on a day trip. Expense reports must be submitted within 30 days of the day you arrive back in the office for those items not charged on the company credit card. Limit tipping to 20% or less of any meal bills.

Spectrum expense reimbursement covers:

- Tolls
- Meals
- Lodging
- Parking
- Other reasonable travel-related expenses.

Alcohol, movies, health clubs, mini-bar fees, and any non-business related costs shall not be reimbursable costs.

#### AMEX & Company Credit Cards

Some employees may be issued company credit cards. These cards are to be used for company business only – any personal usage is prohibited. At no time should any employee purchase alcohol with the company credit card. Employees must submit the detailed meal receipts for dinners while 'on the road', not just the receipt showing the final cost of the meal. Failure to do so will result in the employee being liable for the part or all of the meal costs.

#### Rental Cars, Hotels & Airfare

When traveling, it may be necessary to rent an automobile. Employees are responsible for checking the various rental companies' rates and selecting the most economical price. The rental should be paid for with the company AMEX card. The additional insurance should never be selected.

#### Roles and Responsibilities

It is the responsibility of traveling Spectrum employees and Spectrum management to give this policy their full support.

#### Conduct While Driving

Employees shall refrain from the use of any hand-held devices while operating a vehicle. If it becomes imperative to make a call, send a text, or operate a navigational device, the employee should pull over at the first opportunity.

## HARASSMENT AND SEXUAL HARASSMENT

### Policy Statement

It is the policy of Spectrum Enterprises to maintain a work environment free from all forms of harassment and intimidation, including sexual harassment. Harassment is prohibited in connection with any employee activity including, but not limited to: relations with supervisors and other employees, prospective employees, vendors, or clients. Any allegation of harassment will be investigated.

Harassment includes any repeated unwelcome or unwanted verbal or physical conduct based on race, color, sex, sexual orientation, age, religion, national origin, ancestry, physical or mental disability, veteran or marital status, or any legally protected status, that creates a hostile, offensive or intimidating work environment, or that substantially interferes with an employee's work environment.

Additionally, harassment includes attempts to control, influence, or affect the career, compensation or job of an individual in exchange for sexual favors, or, the creation of an intimidating, hostile or offensive environment based on unsolicited and unwelcome sexual overtures or conduct, either verbal or physical.

Sexual harassment is illegal. It is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual;
- Such conduct has the purpose and effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment."

Examples of sexual harassment may include repeated offensive sexual flirtations, advances, propositions, or verbal abuse; graphic or degrading verbal comments about an individual or his/her appearance; the display of sexually suggestive objects or pictures; or any offensive or abusive physical contact. In addition, no one should imply or threaten that an applicant or employee's cooperation of a sexual nature (or refusal thereof) will have any effect on the individual's employment, assignment, compensation, advancement, career development, or any other condition of employment. The following are examples provided by the Maine Human Rights Commission:

### Susan

Susan recently took a job in the skilled trades. The men on the job make lewd sexual remarks and refuse to cooperate with Susan on job assignments. They tell her if she's "so good" she can do the job herself. She finds obscene messages pasted to her locker, her work bench, and in her tool kit. Her supervisor suggests if she can't "take a little fun" she should transfer to a new assignment.

### June

June worked as a sales person at a retail establishment. Two male co-workers tell dirty jokes of a sexual nature to her and make lewd remarks. She tried to ignore the comments by walking away. The verbal comments increased, and one co-worker began to touch her in sexually suggestive ways. June complained to her manager, who said he "would take care of it", but the harassment became worse over the next few weeks. June felt forced to leave her employment.

#### Joan

Joan works in a company as a custodial worker. She has been employed only a short time when a male co-worker begins making obscene sexual remarks to her. She tells him to leave her alone, and he reacts by forcing her into a locker room to cooperate with his sexual demands. She complains to her supervisor, but her supervisor tells her that he can't do anything and that she should "work it out." The next day Joan is subjected to the same verbal and physical threats.

#### Sam

Sam works for a firm in Sales and has to travel to other cities with his boss. The boss wants to share a hotel room "to save the company some money." When Sam refuses she tells him to stop "acting like a baby" and "smarten up". She later gives him a poor performance evaluation, and he is terminated shortly afterwards.

#### Procedure

It is every Spectrum employee's responsibility to speak with his/her supervisor immediately if you believe you are being subjected to sexual harassment. Any employee who believes he/she is being harassed by a supervisor or manager should promptly take the following actions:

1. Document your complaint – write down the incident, what was said or done, who might have witnessed it and the date. Keep any related memos or correspondence.
2. If you are comfortable doing so, confront the harasser and clearly ask him/her to stop. If you feel uncomfortable with this step, move to step 3 below.
3. Immediately inform the benefits administrator or a company owner. If any member of Spectrum management is the subject of the complaint, the complaining employee is encouraged to notify an alternative member of management.
4. Your complaint will be investigated in a timely manner. Information concerning your complaint will be given on a need-to-know basis, only. Spectrum management and involved individuals who may be witnesses may be contacted, and thereby learn of the complaint. All employees are instructed not to discuss the complaint or investigation, except as necessary to respond to an investigation. The purpose of this provision is to protect the privacy of the complaining employee as well as the reputation of the employee who may be wrongly accused of harassment.
5. The highest member of management necessary to result in fair investigation, including the President, will determine the outcome of the investigation, decide what, if any, remedies or sanctions should be imposed, and will impose them.
6. The complaining employee and alleged harasser (separately and privately) will be notified of the end result of the investigation.
7. The complaining employee and the alleged harasser have the right to appeal the determination by writing a memo or letter delivered to the President within ten (10) working days of the notification,

No retaliatory measures will be taken against any employee who makes a report of harassment. Any person found to have retaliated against another individual for reporting harassment will be subject to disciplinary action, up to and including termination of employment.

The Maine Human Rights Commission is the state agency that enforces Maine's anti-discrimination laws including laws against sexual harassment. While Spectrum encourages employees to report any incident of harassment to management, employees also have the option of filing a complaint of sexual harassment or other type of unlawful harassment with the Maine Human Rights Commission at 51 State House Station, Augusta, Maine 04330, ( Phone 207-624-6290, Fax 207-624-8729,). A complaint must be filed with the Maine Human Rights Commission within 300 days of the alleged harassment. Employees are protected by law from retaliation for filing a complaint of sexual harassment or other unlawful harassment with the Commission.

#### Roles and Responsibilities

It is the responsibility of Spectrum management to give this policy full support, to work to prevent and eliminate unlawful harassment, and to promptly address the matter when a complaint is made. It is the responsibility of each and every employee of Spectrum to create a job environment that is free from all forms of harassment and intimidation in their dealings with fellow employees, clients, and visitors to the Spectrum offices. Please see additional addendum for state specific policies.

### DRUG FREE WORKPLACE

#### Policy Statement

In order to provide for the health and safety of all employees, Spectrum Enterprises promotes a workplace that is free of illegal drugs. Spectrum does not tolerate nor condone the unlawful manufacture, presence, possession, sale, intent to sell, purchase, intent to purchase, or use of any controlled substance or alcohol consumption on company property (leased or owned). Should an employee engage in such activity while on the job or while on the property of Spectrum, or while on a client's property, disciplinary action will follow.

#### Procedure

Should an employee be found to have violated this policy, disciplinary action may include:

- Requirement that the employee receive counseling or rehabilitative services; or
- Termination of employment.

Should an employee be convicted of a violation of criminal drug statute, or be convicted of an alcohol violation, based on activities occurring while on the job, or while on Spectrum premises, or client premises, the employee agrees to notify his/her supervisor. This notification must be made in writing within 5 days following the conviction.

Being under the influence of prescription drugs or alcohol while at work may also pose a risk of injury to the employee, co-workers, clients, or the public. Accordingly, employees must report to their supervisor, any use of prescription, over-the-counter drugs, or alcohol, which may affect their work performance.

If a staff member believes that a co-worker might be under the influence of drugs while at work, on company premises, in a company vehicle, or operating a leased vehicle on company business, the staff member must notify his/her supervisor immediately.

#### Roles and Responsibilities

It is the responsibility of all Spectrum employees to give this policy their full support. Employees must make reports to their supervisor consistent with this policy and Spectrum management must take action

to safeguard employees, clients, and the public when notified of a potential safety threat due to the use of drugs or alcohol of any kind.

## COMPANY PROPERTY

### Policy Statement

Spectrum invests substantial resources in equipment and property to enhance employee work results. Spectrum instructs employees on the proper use of its property. In addition, the nature of Spectrum business establishes a special concern with respect to intellectual property. The company vigorously protects its intellectual property as essential to its competitive/leadership position in the marketplace. Employees must use company-issued equipment and property with care and respect for its value and continued use.

### Procedure

#### Vehicles

Spectrum owned or leased vehicles must be operated and maintained according to manufacturer recommendations. Specific employees will be notified of their responsibility for regular maintenance and will be expected to see that regular maintenance is performed. Vehicles are to be cleaned at the end of use so that the next operator enters a vehicle that is immediately fit for use. Vehicle damage resulting from illegal operation by employees will be the responsibility of the employee or their insurance provider. Employees may not operate Spectrum vehicles without a valid driver's license or in-force automobile insurance. Fines and tickets will be the responsibility of the employee. Company vehicles are for business use only. Employees are not to use for any personal reasons what so ever.

Mileage reimbursement for use of employee vehicles covers gasoline and vehicle wear and tear. The reimbursed rate is the IRS rate.

#### Equipment

Employees are issued various pieces of electronic and utilitarian equipment, whose working order is essential to the adequate performance of job duties. Employees are charged with the responsibility of safekeeping this property, knowing where it is at all times, and stowing the equipment properly to protect it from fire, damage, or theft while the property is under their control. Employees are required to prevent non-employees from using or tampering with, this property. In the event of theft, employees must make a police report and submit a copy of this report to Spectrum management when reporting the theft to the Spectrum office. Employees who damage Spectrum property through mistreatment or misuse will be subject to disciplinary action, including reimbursing the cost of such equipment and/or dismissal.

#### Passwords and Keys

Computer passwords, keys and any other security mechanism must be kept confidential and secure at all times. Sharing this information/property with non-employees or with employees who may not be authorized to have this information/property, may result in disciplinary action, up to and including dismissal.

#### Intellectual Property

Program designs, product ideas, short and long-term plans and any other proprietary information is the property of Spectrum Enterprises and may not be shared outside the office unless expressly directed to do so by Spectrum management. Employees who have questions about what constitutes proprietary information should speak with their immediate supervisor for specific clarification. Sharing proprietary

information or property with non-employees or with employees who are not authorized to have this information, may result in disciplinary action, up to and including dismissal.

#### Cell Phones

The company provides cell phones to specific members of its staff and pays for the monthly telephone charges incurred. Those not on the company plan but that management deems as equivalent level employees (i.e. company need based on job title or description) will allow those employees to receive cell phone reimbursement at an amount not to exceed the employee's typical monthly cell phone bill. This reimbursement can be done every 6 months and is up to the employee for submission (i.e. the company will not automatically reimburse the employee).

It is reasonable that an employee can use the cell phone to call their home while they are traveling. These calls, if of a reasonable length, will not be considered personal calls. If an employee uses their personal cell phone for company business, and exceed their plan's allotted minutes, the company will reimburse the employee for any overage due to business calls.

The use of hotel phones should be kept at a minimum, due to the cost factor. Any employee that will be traveling and requires the use of a cell phone should notify management.

#### Office Phones

It is expected that the use of the office phones should be restricted to company business calls. Employees should track any personal long-distance calls and reimburse the company.

#### Roles and Responsibilities

It is the responsibility of Spectrum management and each employee to give this policy full support.

### CLIENT ENTERTAINMENT EXPENSES

#### Policy Statement

The entertainment of clients is generally the function of Spectrum management. Other employees are not expected to entertain clients without the prior permission of management. Any non-business activities, other than meals, during a work engagement should be discussed with Spectrum management in advance. Expenses incurred when entertaining clients, associates, suppliers etc. may be reimbursed providing these guidelines and policies are adhered to.

#### Procedure

##### Business Meals

Reasonable business meals with business associates and clients that are essential to conducting company business will be reimbursed. If more than one employee is present, the senior level employee must charge the meal. Documentation of the client, their business relationship and topics discussed, or benefits derived, must be written on the receipt or record of charge.

##### Entertainment

All entertainment expenses must be pre-approved by Spectrum management.

The company must expect to derive some specific benefit, at some future time, from business discussions before, during or after the entertainment event. The senior level employee attending the event must charge the expense.



#### Gifts to Clients / External Parties

All gift expenses must be pre-approved by Spectrum management. Gifts to business associates or clients should be kept appropriate to the business relationship. Details of the gift, value, recipient and their employing company must be shown on the Expense Report.

### NON-REIMBURSABLE EXPENSES

#### Policy Statement

Expenditure items listed in this section are not reimbursable under company policy. The list is provided only as a guide and is not necessarily all-inclusive. When unsure, clarification should be sought from Spectrum management.

#### Procedure

Incidental charges on hotel bills may be charged to the company card, but are not reimbursable. These charges are personal and must be paid by the employee upon receipt of the credit card statement. They are as follows:

- Newspapers, videos and hotel room movies.
- Alcohol
- Traffic and parking violations.
- Hotel health and fitness center charges; employees desiring these facilities should stay at preferred properties offering them at no additional cost
- Car service “no show” charges or charges for personal stops with associated waiting time while en route
- Snacks and refreshments consumed during working hours such as coffee, soda, candy, etc., which are in addition to meal charges for breakfast, lunch and dinner
- Laundry services

#### Roles and Responsibilities

It is the responsibility of traveling Spectrum employees and Spectrum management to give this policy their full support.

### INFORMATION TECHNOLOGY AND COMPUTING STANDARDS

#### Policy Statement

Spectrum utilizes computing and information technologies to ensure the effective management of resources and delivery of quality client service. The company provides staff with relevant technology applications and training on the proper use of such products. In addition, the company protects client confidentiality. Furthermore, the company holds an expectation that staff will act responsibly when using computing technology. The policy covers all the company computing equipment, automated information including administrative and client service-related systems.

#### Procedure

Spectrum management installs, or authorizes designees to install, all computing technology. Employees are not authorized to install any software or hardware without express permission to do so. Spectrum respects the privacy and personal integrity of its staff. However, computing technology remains the property, and potential liability of Spectrum Enterprises, Inc. Spectrum management will review computers periodically for software content, file content and compliance with company policies.

### Equipment Handling

Spectrum management assigns computing technology equipment to specific staff for the purpose of conducting company business. This equipment may not be loaned to, or otherwise used by persons outside the company.

Each employee is fully trained in the care and handling of the computer equipment assigned to them. Staff who use portable equipment are expected to take steps to prevent theft or damage while traveling outside the office. Employees should not leave computers in vehicles, but rather in a secure office. When that is not possible, computers should be placed under cover in the vehicle. Equipment in the office, which is easy to remove and typically the target of theft, is put away at the end of the workday to protect against theft or damage. Staff are trained in the proper startup, use, and shutdown procedures suggested by the product's manufacturer.

### Software Licensing and Legal Obligations

The company will purchase and maintain licenses for all operating systems and application software purchases to ensure compliance with vendor requirements. Originals of legal documentation will be maintained in centralized files.

### Troubleshooting and Repair

Users having difficulty in using equipment or software applications should first refer to peers within their respective departments for assistance. If no resolution is made there, then users should refer to Spectrum management for assistance. Spectrum management will contract with outside resources when necessary for diagnosis or repair.

### Anti-virus software

Up-to-date anti-virus software is maintained on all company computers and the email server to protect the company from virus and external corruption. Employees are prohibited from interfering with or altering this software unless directed to do so by Spectrum management.

### Internet Access and Usage

Spectrum provides access to the internet for certain employees who are expected to use this tool to conduct Spectrum business. Employees may not download non-business-related material or software on company equipment. Employees may not download any business or non-business related software onto company equipment that has not been pre-authorized by Spectrum management. Employees may not alter company software, data, files or other applications except as directed by Spectrum management. Employees may not use corporate Internet connections for the conduct of any commercial endeavor other than that of Spectrum Enterprises.

Employees are prohibited from browsing adult or otherwise inappropriate websites at any time, for any reason:

- while using company equipment or client equipment;
- while using personal equipment on Spectrum property or client property; or
- in plain view of others while traveling on company business.

Company computers track the history of sites browsed. These histories will be audited at regular intervals by Spectrum management.

Employees may occasionally use their connection to conduct personal business as long as it is during breaks or before or after work hours, the use doesn't interfere with the acceptable performance of their job duties, and otherwise fits within the parameters included herein.

#### Electronic mail

Spectrum provides the use of e-mail to employees as one business communication tool. The following guidelines provide cautions regarding the use of company-provided email.

1. E-mail sent and received by Spectrum's e-mail and computer networks are considered in the public domain, and are not protected by the First Amendment. This means the company can monitor and guide both content and usage.
2. Spectrum e-mail is not private. E-mail can easily be forwarded to others unintentionally or be intercepted and read by individuals outside the company. A rule of thumb is to not write anything that you would not want publicly posted.
3. Any e-mail sent from our domain (spectrumlihtc.com) contains the company name and as such, the sentiments expressed therein represent the company. Language and sentiments should be professional and consistent with accepted business practices just as with correspondence written on Spectrum letterhead.
4. Spectrum's *Harassment and Sexual Harassment* policy covers e-mail, the same as any verbal or written communications. Mildly off-color material regularly routed through Cyberspace with innocent intentions, but is easily misunderstood. If an employee would not feel comfortable saying what has been written or forwarded in a group of mixed company co-workers, it is not appropriate email content. The use of profane, obscene, harassing, or otherwise offensive language can result in disciplinary action.
5. E-mail is provided for business purposes and should be limited to Spectrum activities. However, limited personal use is allowed provided it is not commercial in nature; not for illegal purposes; not used in a manner in conflict with the Spectrum policies; done during breaks or before or after work hours; and does not interfere with any employee's job performance.
6. Once you build an address book, it is tempting to send messages to multiple names. This is a powerful communication tool but it can easily be misused and lead to unproductive information. E-mail should be efficient and effective and the intended audience should be thoughtfully considered. Policy information or company-wide announcements should come from Spectrum management. Non-company business such as solicitation for charities or other private businesses is prohibited.
7. Proprietary information should never be distributed outside the company via e-mail; any information the company considers confidential or private such as staff salaries, performance evaluation materials, or client related materials, is protected under the policies: *Staff Conduct* and *Company Property*.

Questions about the use of company internet connections or email usage should be directed to employees' direct supervisor.

#### Roles and Responsibilities

It is the responsibility of Spectrum management and all employees to give this policy full support. It is the responsibility of Spectrum management to determine if internet use or company email is being used properly. Spectrum management will perform periodic audits and decide what disciplinary consequences are appropriate, up to and including dismissal.

## Password Policy

Passwords must not be stored within public view. Passwords must consist of the following: 8 or more characters in length, must use at least 1 upper, 1 lower, 1 numerical, and 1 special character that is difficult to guess. Passwords expire every 90 days. Employees will be unable to reuse the last 12 previously used passwords.

## EMPLOYEE GRIEVANCES

### Policy Statement

In an agile, fast-paced environment, no matter how clear and fair company policies are, disagreements arise. Disagreement, by its nature, is not a negative thing; rather it is silence or unproductive gossip among employees that results in an unhappy, unproductive workplace. Employees are expected to speak up, professionally and directly to their direct supervisor in the event that they have concerns, questions, or serious issues with fellow employees, Spectrum Enterprises, or Spectrum management. Spectrum management will listen respectfully to any feedback that is professionally and honestly delivered in this circumstance.

### Procedure

#### Normal Issue Identification and Resolution Process

When an employee raises an issue of any kind to Spectrum management, management will fairly investigate the matter, decide an appropriate course of action, and inform the employee.

#### Formal Grievance

An employee grievance occurs when an employee suspects or alleges that a company policy has been violated by Spectrum staff or management, or is not being followed consistently. In this circumstance, the employee must follow a set process outlined below:

- Address the matter with his/her direct supervisor, the benefits administrator, or the Vice President (employee has the choice with whom they are most comfortable speaking with)
- Prepare the 'Spectrum Incident Report' and submit it to the benefits administrator

The benefits administrator will investigate the matter, discuss with management, and inform the employee of the resolution. Interviews with other employees may be part of the resolution process. The decision of the Vice President is final in this matter.

At no time is it appropriate for an employee who suspects a corporate policy has been violated to gossip with peers. Management can only respond to issues brought to them for resolution.

### Roles and Responsibilities

It is the responsibility of Spectrum management and all employees to give this policy full support and to help create a work environment where employees speak up professionally to management and where management makes sound decisions.

## EMPLOYMENT SEPARATION

### Policy Statement

Spectrum's employment goal is to build mutually beneficial relationships with employees in which performance is consistent high quality, employees are well compensated, and company goals are met. However, the company recognizes that employees may wish to change their employment. Spectrum may also wish to terminate employees for a variety of reasons. Employees in good-standing are encouraged to give notice as soon as possible to facilitate the replacement process.

## Procedure

Any Spectrum employee may be terminated immediately for misconduct of any kind. The definition of misconduct includes violation of Spectrum policy, misrepresentation of fact or situation, and any other matter deemed inappropriate by Spectrum management.

Other termination can occur for unsatisfactory job performance. Employees deemed to be performing at an Acceptable level/Meets Expectations, with one or two areas that need improvement may be given training, coaching and opportunities to improve provided that the one or two areas are not key or central to the position. The nature and degree of the performance shortcoming is considered when Spectrum management is determining whether improvement activities or termination will result.

Employees terminated by Spectrum or who resign are required to return all equipment and tools assigned to them during the course of their employment, before their last day of employment. This includes keys, computers, peripherals, cell phones, monitoring equipment, and any other Spectrum property. Employee will reimburse Spectrum Enterprises for any lost or damaged equipment. In addition, all expense reimbursement must be settled by the last day of employment. Employees terminating with borrowed PTO time will have this amount deducted from their last paycheck. Unused sick time is lost and will not be paid.

Access to the Spectrum credit cards, charge accounts, computer networks, and email accounts of terminating employees will be closed at Spectrum's discretion.

Spectrum contracts are their "products." As a condition of employment, employees agree that monitoring contracts belong to Spectrum Enterprises and further agree, not to compete with the Company for any monitoring contracts, for a period of two years, following employment termination from Spectrum, for any reason.

## Roles and Responsibilities

Administration of this policy is the responsibility of Spectrum management.

## Working Remotely

Working remotely will initially only be allowed if management feels that an employee is properly trained in their position. Some positions, due to their duties, might not allow for remote work on a continuing basis.

Any employee who requests to work remotely should be highly proficient in their job duties before requesting remote work. All employees are subject to maintaining a high work standard while working remotely. If performance suffers, workload is not completed, other distractions create poor work, clients complain about not being able to reach/receive communication from an employee, or any other situations arise that puts the company profits in jeopardy due to the employee working remotely, then management will not allow the remote work to continue.

Employees are expected, if they do work remotely, to have the appropriate secure Spectrum Enterprises equipment (i.e. laptop, PC, etc) and a secure remote internet connection, with any security as required by the IT department.

Even if an employee is currently working remotely on a regular basis, the employee is still required to work in the office at least one day per week. The exception to this is when an employee is on company travel, so

during those weeks, the employee is exempted from working in the office. The day in the office should coincide with an employee's supervisor, if both the employee and supervisor normally work remotely.

Employees may work remotely on occasion if there are other work day interruptions that would make it a more productive day to work remotely (i.e. employee has several appointments during the day). These remote days are subject to manager approval.

Any employee who is working remotely should be aware that it is at management's discretion to require in office attendance or reduce the amount of hours in which an employee can work remotely. Management may also have to require remote work if environmental circumstances dictate such or if employee health or safety are at risk.