

100 Introductory Statement

The Industrial Safety Training Council (ISTC) Employee Handbook establishes policies, procedures, benefits and working conditions that will be followed by all employees as a condition of their employment with ISTC.

ISTC strives to provide an employee-friendly environment in which goal-oriented individuals thrive. Our company commitment to serving customers and providing quality products and services is unwavering. These policies, procedures and working conditions provide a work environment in which both customer and employee interests are served.

We value our employee's talents, skills and abilities and seek to foster an open, cooperative and dynamic environment in which we can all excel. ISTC provides an environment where employees are encouraged to bring ideas and challenges to any level of management.

ISTC is an equal opportunity employer. Religion, age, gender, national origin, sexual orientation, race or color does not affect employment decisions including hiring, promotion, development opportunities, pay or benefits. We offer fair treatment of employees based on merit and comply with all applicable federal, state and local labor laws.

Employment with ISTC is "at-will", which means that either an employee or ISTC may terminate the employment relationship at any time, for any reason, with or without cause. This handbook is not a contract of employment nor is it intended to create contractual obligations for the company of any kind or alter the at-will employment relationships between ISTC and our employees. Only a written agreement, signed by the President/CEO of ISTC can change the at-will nature of the employment of any individual.

When the term "premises" is used in this Handbook, the word is referring to all ISTC locations, and the property owned and surrounding these locations, such as parking lots.

The policies and procedures outlined will be applied at the discretion of ISTC management. As such, ISTC may deviate from the policies, procedures, benefits and working conditions described in this handbook. The company may also withdraw or change the policies, procedures, benefits and working conditions described in this handbook at any time, for any reason. While it is our goal to provide employees with notice of such changes, prior notice is not required before a change is implemented. Throughout an employee's employment with ISTC, it is their responsibility to remain up to date on company policies, procedures, benefits and work conditions—both published and unpublished.

No provision in this handbook can be waived without written permission from ISTC's President/CEO, or designee. Please review the policies, procedures, working conditions and benefits described in this handbook. You will be asked to affirm that you have read, understand, agree to, abide by and acknowledge your receipt of this employee handbook.

101 Employment Policies

This Employee Handbook ("Handbook") is intended to guide all relations between you and ISTC. The policies stated in this Handbook prevail over any other policies, which you have been previously given. The adoption of this Handbook supersedes and rescinds any previously published handbook or policies. The provisions of this Handbook shall remain in effect until amended or rescinded by ISTC.

The Handbook is issued as your guide to assist you in learning ISTC's expectations of you as an employee. It is the purpose of this Handbook to provide to you, our employees, current and easily accessible material which will provide information about ISTC's personnel policies and will promote uniform and equitable treatment for all employees. ISTC reserves the right to unilaterally amend, delete, or supplement any and all portions of this Handbook at any time, as it deems necessary to promote better business practices and to meet changes in the marketplace. Normally, we will notify you of these changes by sending an e-mail, and/or providing a hard copy of the new or changed policy to all employees and notifying you of the effective date of the change. Once you have received notification of a change, you will be expected to review the new or updated policy and sign off on it. You are expected to review changes to policy in a timely manner after you are notified and you must comply with the new policy as of the date it becomes effective, even if you have failed to review it. Changes will be effective on dates determined by ISTC and you may not rely on policies that have been changed. Only the President/CEO and/or Board of Directors have the authority to change or modify a policy. You are expected to read this Handbook (and any subsequent amendments) and to abide by the rules stated in it. If you have questions about any policies, contact Human Resources or the Vice President of HR.

Supervisors may propose procedures that are specific to their department that assist in facilitating the policies written in this Employee Handbook. These proposals must be approved by their Department Head and Human Resources before they are enacted.

102 Employee Relations

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

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

103 Equal Employment Opportunity

ISTC provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability or genetics. In addition to federal law requirements, ISTC complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Any form of workplace harassment based on race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability or veteran status is expressly prohibited.

ISTC is committed to a diverse workforce. We value all employees' talents and support an environment that is inclusive and respectful. We are strongly committed to this policy and believe in the concept and spirit of the law.

ISTC is committed to ensuring that:

- All recruiting, hiring, training, promotion, compensation and other employment-related programs are provided fairly to all persons on an equal opportunity basis
- Employment decisions are based on the principles of equal opportunity. All personnel actions such as compensation, benefits, transfers, training, and participation in social and recreational programs are administered without regard to any characteristic protected by state, federal or local law
- Employees and applicants will not be subjected to harassment, intimidation, threats, retaliation, coercion or discrimination because they have exercised any right protected by law
- Reasonable accommodations will be made for disabilities

ISTC practices equal opportunity. The Human Resource Department serves as our Equal Opportunity Coordinator and has overall responsibility for assuring compliance with this policy. All employees are responsible for supporting the concept of equal opportunity and diversity and assisting ISTC in meeting its objectives.

Please contact Human Resources with questions or concerns.

104 Employment of Relatives

Relatives may be employed by ISTC. They will not be assigned under the direct supervision of a relative.

For the purposes of this policy, a relative is any person who is related by blood or marriage.

105 Immigration Law Compliance

The Immigration Reform and Control Act (IRCA) prohibits all employers from hiring illegal aliens and requires that all employers verify the legal status of all employees. United States law requires that every employee must complete Form 1-9, the Employment Eligibility Verification Form, issued by the Immigration and Naturalization Service, attesting under the penalty of perjury that they are either United States nationals or aliens authorized to work in the United States and provide documents establishing both identity and employment eligibility within 72 hours of starting work. The Form 1-9 lists the documents, which are acceptable for this purpose. All new employees must provide original or certified photocopies of each document presented. IRCA requires employers to examine the document(s) presented for genuineness. If the documentation presented does not reasonably appear to be genuine or relate to you, ISTC must refuse acceptance and ask for other documentation from the list of acceptable documents that meets the requirements.

If you cannot meet these requirements within the required time frame, you will not be allowed to continue to work. You will need to reapply when you can comply with IRCA requirements. If the ISTC learns that an employee whose documentation appeared to be in order for Form 1-9 purposes is not actually authorized to work, ISTC may request another review of appropriate documentation. If the employee is unable under such circumstances to provide satisfactory documentation, employment will be discontinued.

The verification procedure will be applied to all employees. ISTC will hire all employees without respect to the national origin or citizenship status of those authorized to work in the United States and will not discriminate against any employee or potential employee on the basis of foreign appearance, language or name.

106 Conflicts of Interest Policy

Employees have an obligation to further the company's aims and goals, and to work on behalf of its best interest. Employees should not place themselves in a position where their actions or personal interests may be in conflict with those of Industrial Safety Training Council. Examples include: soliciting or profiting from the company's client or prospect base or other company asset for personal gain; acting on behalf of in servicing or obtaining a client, and limiting the best solution for the client or prospect for personal financial gain; and acting as director, officer, employee or otherwise for any business or institution with which has a competitive or significant business relationship without the written approval of the President/CEO.

Employees should report to their manager any situation or position (including outside employment by an employee or any member of an employee's immediate household) which may create a conflict of interest with Industrial Safety Training Council.

This Employee Handbook policy is a supplement to the corporate conflict of interest policy and all employees are governed by the broader corporate conflict of interest policy, including the periodic reporting requirements contained in that policy.

107 Intellectual Property Assignment

All employees of ISTC who participate in the development, modification and refinement of written, electronic and other materials in furtherance of the Council's purposes and mission or who come across any such materials (collectively, the "Intellectual Property"), by their continuing participation in such capacity, for good and valuable consideration, do completely, exclusively and irrevocably assign and agree to assign to ISTC in perpetuity ownership of all of the copyrights and any other related intellectual property (and all rights subsumed thereunder) in and to all of those contributions to the Intellectual Property, including contributions which the individual makes themselves (the "Contributions"), including both those Contributions that have been made in the past and those that will be made in the future.

108 Business Ethics and Conduct

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

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

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

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

It is against ISTC policy to obtain or maintain business through unlawful or improper payments to customers or other third parties. Offering inappropriate gifts, or bribes or other payments or benefits to members or third parties in order to obtain business is a violation of ISTC policy. Only legitimate and appropriate business entertainment is allowed and proper expense account reporting is required. ISTC assets will not to be used for personal gain or benefit. The use of ISTC credit cards/accounts for personal use is prohibited.

ISTC employees and their families are not allowed to accept either directly or on their behalf, entertainment or gifts from competitors, members or contractors, except as common courtesies associated with customary business practice. Accepting cash or cash equivalent is prohibited.

Employees may not contribute ISTC funds to any political party, candidate, or office holder of government.

Insider trading laws are being aggressively enforced in the United States (by the Securities and Exchange Commission) as well as in other countries. These laws basically prohibit a person from buying or selling the stock of any company if he/she uses material or non-

public information in making the purchase or sale. Violations can result in civil and criminal penalties. ISTC employees may have access to material or confidential information. They are prohibited from taking advantage of such information when they buy or sell stock. Likewise, they are prohibited from giving such information to others that may use it in any stock transactions. Non-public information may not be used by employees or disclosed to anyone else for personal gain.

It is ISTC's intent to be perceived as an environmentally friendly member of the business community. ISTC will conduct its business in strict conformance to environmental regulations. Full consideration of environmental impact should be given to all operations, which may have such impact.

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

This Employee Handbook policy is a supplement to the corporate business ethics and conduct policy and all employees are governed by the broader corporate business ethics and conduct policy, including the reporting requirements contained in that policy.

109 Antitrust Policy Statement

All employees should comply with Federal and Texas antitrust laws applicable to the day-to-day business and activities of the Council.

Antitrust laws are generally thought applicable to the private business community. However, they also apply to non-profit organizations. An organization such as ISTC, by nature is a combination of competitors, which has the capacity of being a conduit for collusive action resulting in an illegal restraint of trade. Being continually cognizant of this, it is the policy of ISTC to comply strictly and in all respects with the antitrust laws. As a practical matter, such compliance is almost always a safeguard against violation of state antitrust statutes.

Basic Antitrust Laws

Portions of two of the principal antitrust laws are applicable to non-profit associations: Sections 1 and 2 of the Sherman Act which prohibit contracts, combinations and conspiracies in restraint of trade and monopolization and attempts and conspiracies to monopolize; and Section 5 of the Federal Trade Commission Act, which establishes broad prohibitions against unfair methods of competition and unfair or deceptive business acts or practices.

A violation of the Sherman Act is a felony, for which an individual may be imprisoned for up to ten years and fined up to \$1,000,000.00. Corporate violators may be fined up to \$10 million. Thus the possible ramifications for those found guilty of price fixing, bid rigging, market allocation among competitors, or other types of hardcore antitrust violations are severe.

Because these laws speak in general philosophic terms, it is oftentimes difficult to know whether a certain course of action or an association practice specifically violates the law. It is for this very reason that ISTC feels it is imperative to publish at least the basic principles it follows in the conduct of its business, with the intention of having a living document to be amended and updated when a particular principle needs to be added or an existing one needs to be restated to comply with new statutory or case law.

The Principles of the ISTC Antitrust Policy

1. Price fixing and boycotts, express or implied, are in and of themselves (*per se*) violations of the law. ISTC will not permit any discussions or exchanges of information regarding prices or other terms and conditions of sale that may affect price (including discounts, payment terms, warranty terms, credit, freight allowances, profit margins, and cost factors) at any Association meeting or other meeting to which it is a party. Members of ISTC also should not discuss or exchange information about production volumes or any
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restrictions on the amount of any member's production.

2. ISTC will not deny membership to a person or firm if such denial unreasonably restrains trade, nor will a member be expelled for reasons that would be insufficient to deny membership.
3. Whenever ISTC becomes involved in statistical reporting, it will clearly spell out its purposes and uses, which will be to provide information to assist members in business decisions and not to restrict competition. Such statistics will deal only with historical information and will be disseminated only in aggregate form. Participation will always be voluntary.
4. ISTC will not sponsor or be a party to agreements, express or implied, which restrict the members' freedom in any way to make independent decisions in matters that affect competition.
5. If you have any questions or antitrust concerns relating to ISTC programs, meetings, or activities, consult with ISTC's President/CEO or ISTC's general counsel or consult your own counsel.
6. These same standards of conduct are to be observed at any and all informal or social discussions at the sites of any ISTC meeting.

This Employee Handbook policy is a supplement to the corporate antitrust policy and all employees are governed by the broader corporate antitrust policy, including the reporting requirements contained in that policy.

110 Privacy Policy

No employee has a reasonable expectation of privacy in connection with any computer, tablet or cell phone the employee uses as a result of request or instruction by ISTC to use that computer, tablet or cell phone, particularly when the employee has been provided the device by ISTC. This disclaimer extends to all email, social media, or messaging accounts created by ISTC for use by the employee. The employee will actively maintain any password needed to access the account with the Information Technology department so the IT department can at all times access the account. The employee will not be required to maintain IT department access to any email, social media or messaging account the employee owns which the employee uses exclusively for personal use provided the employee in turn agrees to use that account not to refer in any form or fashion to ISTC or the employee's employment by ISTC except in exercising State or Federal protected rights.

111 Whistleblower Policy

ISTC requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ISTC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees to raise serious concerns internally so that ISTC can address and correct inappropriate conduct and actions. It is the responsibility of all employees to report concerns about violations of ISTC's code of ethics or suspected violations of law or regulations that govern ISTC's operations.

No Retaliation

It is contrary to the values of ISTC for anyone to retaliate against any employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of ISTC. An employee or Supervisor who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

ISTC encourages their employees to share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the President/CEO. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the President/CEO as well as Human Resources who has the responsibility to investigate all reported complaints.

This Employee Handbook policy is a supplement to the corporate whistleblower policy and all employees are governed by the broader corporate whistleblower policy, including the provisions in that policy providing to whom the employee may direct complaints or reports beyond the employee's supervision contained in that policy.

112 Non-Disclosure / Confidentiality

ISTC employees will not disclose confidential information belonging to, or obtained through their affiliation with ISTC to any person unless ISTC has authorized disclosure.

Employees must demonstrate professionalism, good judgment, and care to avoid unauthorized or inadvertent disclosures of confidential information. Such confidential information includes, but is not limited to the following examples:

- Generic and site specific orientations
- Trainee / Participant Information
- Compensation data
- Customer lists
- Financial information
- Pending projects and proposals
- Research and development strategies
- Technological data

Failure to adhere to this policy may result in disciplinary action up to and including termination of employment.

Upon separation of employment, the employee shall return all ISTC electronics, documents, papers, and other materials, that may contain confidential information.

113 Policy Against Discrimination, Harassment, and Sexual Harassment

ISTC has zero tolerance for any form of discrimination, and is committed to providing a workplace free from any form of unlawful discrimination, including any form of harassment, hostile work environment, and intimidation or hostility toward an individual based on that person's race, color, religion, sex, pregnancy, national origin, age, disability, veteran status, or any other protected status under federal, state or municipal laws. Employees who discriminate against another employee, customers, or vendors will be disciplined, up to and including, immediate termination.

Harassment of any kind in the workplace, whether verbal, physical, visual or otherwise, is strictly prohibited where such conduct: (a) creates an intimidating, hostile, or offensive work environment; (b) unreasonably interferes with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities.

The following conduct is prohibited: (a) unwelcome sexual flirtations, advances or propositions; (b) verbal abuse of a sexual nature, sexually related comments and joking, graphic or degrading comments about a person's physical appearance or body; (c) uninvited and unwelcome physical contact or touching, such as patting, pinching, brushing against another's body, impeding, blocking or other physical interference with a person's normal work or movement; (d) verbal harassment regarding a person's race, color, religion, sex, national origin, age, disability, veteran status, or any protected status under federal or state laws, including but not limited to nicknames, slurs, or other denigrating comments, negative stereotyping, gestures, or jokes; (e) threatening, intimidating, or hostile acts, that relate to a person's race, color, religion, sex, national origin, age, disability, veteran status, or any protected status under federal or state laws; (f) visual forms of harassment including written or graphic material that demeans or shows hostility or aversion toward a person or group because of race, color, religion, sex, national origin, age, disability, veteran status, or any protected status under federal or state laws, such as denigrating posters, sexually-oriented cartoons, pictures, drawings or the display of sexually suggestive objects or pictures on the premises; (g) undesirable work assignments due to a person's race, color, religion, sex, national origin, age, disability, veteran status, or any protected status under federal or state laws.

While all the forms of harassment described above are prohibited, ISTC further stresses its commitment to provide a work environment free of sexual harassment. Sexual harassment is a form of sex discrimination. Unwelcome conduct of a sexual nature is strictly prohibited and will be grounds for disciplinary action, up to and including, immediate termination. No Supervisor or other employee may threaten, suggest or imply, directly or indirectly, that submission to or rejection of unwelcome sexual advances, requests for sexual favors, or other verbal or physical

conduct of a sexual nature will in any way affect an individual's employment or employment opportunities with ISTC.

Every employee of ISTC has a right to expect a workplace free of discriminatory conduct, and no person's employment, advancement, salary, evaluation, duties, hours or conditions of employment will be affected because he or she refused to submit to or tolerate discriminatory conduct, or complained of such conduct toward him/herself or another employee, customer, or vendor.

It is the policy of ISTC that all employees are responsible for assuring that the workplace is free from any form of discrimination, retaliation, or harassment. ISTC will not condone such conduct under any circumstances. Any employee who feels that he or she is being harassed, discriminated or retaliated against in any manner by a co-worker, customer or other visitor, supplier/vendor or other person, should immediately bring the matter to the attention of their Supervisor or Human Resources. Any employee, who feels that he or she is being harassed in any manner by their Supervisor, should immediately bring the matter to the attention of Human Resources. Any employee who feels that he or she is being harassed in any manner by Human Resources, should immediately bring the matter to the attention of the President/CEO.

All complaints of discriminatory conduct, including harassment, must be reported promptly so ISTC can investigate the matter promptly, and take appropriate action to stop unlawful conduct. ISTC will make every effort to keep the investigation as confidential as possible. The employee who was the alleged victim of the investigation and the allegedly harassing or discriminating employee will be informed of the results of the investigation when it is concluded.

Every employee has the right and is encouraged to tell any other employee, vendor, or customer in a professional manner to stop behavior towards him/her that the employee believes in good faith to be discrimination or harassment. No employee will suffer retaliation or discrimination as a result of making a complaint of unlawful discrimination or harassment. Failure of any Supervisor to report allegations of discrimination or harassment will lead to disciplinary action if it is determined the Supervisor had actual knowledge of the discrimination or harassment.

114 Violation of Policies and Practices

ISTC reserves the right to discipline any employee for any violation of any policy set out in this Handbook, even if the specific policy violated does not indicate discipline may follow a violation. Such discipline may include termination at the sole discretion of ISTC. ISTC also reserves the right to discipline any employee for conduct or behavior, whether or not such conduct or behavior is the subject of a written policy or employment practice.

115 Chain of Responsibility

ISTC strives to maintain open, effective, and efficient lines of communication among all the employees. Organizationally, the employees are responsible first to their direct supervisor. Direct supervisors are, in turn, responsible to their Vice President. Vice Presidents report to the President/CEO and/or Board of the Directors.

Normally, you should first discuss your employment-related concerns with your immediate supervisor. Once you have in good faith allowed a reasonable period for your immediate supervisor to resolve the problem and he/she has not done so, you may then proceed to the next level of responsibility.

116 Visitors in the Workplace

Authorized visitors will receive directions or be escorted to their destination. Employees are responsible for the conduct and safety of their visitors.

Visitors in employee only authorized areas shall always be accompanied by an ISTC employee. If an unauthorized individual is observed on ISTC's premises, employees should immediately notify their immediate Supervisor or member of management.

200 Employment Categories

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

In addition to the above categories, each employee will be assigned to one of the other below listed employment categories:

REGULAR FULL-TIME employees are those who are not in a temporary or introductory status and who are regularly scheduled to work ISTC's full-time schedule of 40 hours per week on a regular basis. Generally, they are eligible for ISTC's benefit package, subject to the terms, conditions, and limitations of each benefit program. These employees will be paid either hourly or salaried depending on the type of work performed and may be paid overtime as required by the Fair Labor Standards Act as stated in paragraph one above.

PART-TIME employees are those who are assigned to a temporary or introductory status and who are regularly scheduled to work 30 hours or less per week. While they do receive all legally mandated benefits (such as Social Security and workers' compensation insurance), they are not eligible for designated ISTC benefit programs.

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

TEMPORARY employees are those who are hired as interim replacements, to temporarily supplement the work force, or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status unless and until notified of a change. While temporary employees receive all legally mandated benefits (such as workers' compensation insurance and Social Security), they are ineligible for all of ISTC's other benefit programs.

CASUAL employees are those who have established an employment relationship with ISTC, but who are assigned to work on an intermittent and/or unpredictable basis. While they receive all legally mandated benefits (such as workers' compensation insurance and Social Security), they are generally ineligible for all of ISTC's other benefit programs.

201 Employment Applications

As part of ISTC's hiring procedure for employment, all applications, personal information, and employment references will be verified. If you have misrepresented or omitted any facts during your application process and are subsequently hired, you may be discharged.

202 Employment Inquiries

The Human Resources Department will respond in writing only to those employment inquiries from agencies regarding current or former employees that are submitted in writing. In response to such inquiries, ISTC Human Resources will confirm only dates of employment, wage rates, and position(s) held. Additional information can be provided with written permission from the employee.

203 Employment Background Checks

All candidates must authorize a lawful background check as part of the applicant packet. An offer of employment is contingent upon verifying the accuracy of the information provided by the candidate and the background check results will determine his/her suitability for employment with ISTC.

All background checks are conducted by ISTC and by a third-party service provider (vendor).

ISTC background checks comply with all applicable federal and state laws, including the Fair Credit Reporting Act.

New hires and rehires may not start work before the background check has been completed. Employment is contingent upon the satisfactory results of the background check.

Once a candidate has been made an application for employment, the Human Resource Department will have the candidate sign a consent form. Once the consent form is signed the Human Resource Department will initiate the background check including retaining a qualified third-party service provider. Human Resource will maintain a current background check on all employees.

The qualified third-party service provider will forward the results to ISTC's Human Resource Department. ISTC will inform the candidate of the results, provide the candidate an opportunity to review the report, and inform the candidate of his/her rights under the Fair Credit Reporting Act.

If the results are satisfactory, the Human Resource Department will finalize the hiring process.

If the results are unsatisfactory, the Human Resource Department will consult ISTC's General Counsel to determine a course of action. The candidate will be notified of the decision.

204 Access to Personnel Files

Personnel records are maintained for each employee and contain information that is necessary to conduct business or to comply with federal, state, or local laws. ISTC also maintains separate files relating to your benefits and health-related information. Only the employee and authorized employees have access to these files, particularly medical information. It is against ISTC policy for any person who does not have a need to know to review, remove, alter, or destroy an employee's files, or for any employee to remove, alter, or destroy records in their own file. Such conduct may subject an employee to disciplinary action, up to and including termination.

Employees may review their personal record with Human Resources by appointment.

205 Personal Data Changes

It is the responsibility of each employee to promptly notify ISTC of any changes in personal data. Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of an emergency, educational accomplishments, and other such status reports should always be accurate and current. If any personal data has changed, notify the Human Resources Department.

206 Performance Evaluation

Supervisors are responsible for accurately evaluating their employee's performance on a consistent and continuous basis. Performance evaluations are conducted to provide both supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive and purposeful approaches for meeting goals.

Supervisors will formally evaluate employees when the following occasions occur. NOTE: When more than one occasion occurs simultaneously, use the occasion that appears highest on the list.

- After the first 90 days of employment with ISTC
- If you gain a new supervisor
- If your job changes
- Annual Evaluation

Supervisors are encouraged to discuss and review their employee's job performance, goals, and expectations on a continuous basis. Regular and timely feedback from a supervisor is both beneficial and productive to the employee and the organization. The annual evaluation should not be the first time an employee hears about their performance.

207 Employee Concerns

Your work-related complaints or problems are of concern to ISTC, and ISTC wants to provide you with an effective and acceptable means for bringing your problems and complaints to the attention of persons who can help you resolve such problems. It is ISTC's policy to give employees fair and equitable treatment, to provide employees with an easily accessible procedure for expressing concerns, and to foster sound employee- management relations through communication and the resolution of work-related problems. However, this policy cannot be achieved without your cooperation.

If you have a problem or complaint about your job or a condition of employment, discuss it with your immediate Supervisor who knows more about you and your job than any other member of management and is in the best position to handle your complaint properly and quickly. If your concern is about a specific incident, talk with your immediate Supervisor as soon as possible after the incident occurs so that the matter can be timely addressed. Immediate Supervisors are required to take prompt action to answer questions and to resolve problems or complaints. Please reference Policy 115 – Chain of Responsibility.

There will be no retaliation against an employee for truthfully presenting a complaint or discussing a problem with anyone in management. If you follow these steps, you will be considered as having made good faith and straightforward attempts to reconcile problems.

300 Work Schedules

Generally Accepted Work Schedule

The generally accepted work schedule for full-time employees is eight hours a day, five days a week. Supervisors will advise employees of the times their schedules will normally begin and end. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week.

In order to provide training in emergency situations after normal working hours and on weekends, employees may be required to participate in a scheduled rotation. The employee on the scheduled rotation call will be required to respond to a call from an ISTC supervisor within 30 minutes. The supervisor on duty will instruct the employee as to the emergency and what time to report to ISTC (or the designated location for training). All individuals will be compensated for a minimum of three hours for each call out.

301 Employer On The GO

ISTC uses the software Employer On The GO, this is a time system, every employee is given a user name and password. It is the employee's responsibility to maintain his/her time. When an employee misses a time punch or there is a technical issue Human Resources has provided a form that the employee must fill out and his/her supervisor must sign. If this form is not signed by the employee and their supervisor, the employee cannot be paid until it is corrected.

Unauthorized or falsified edits or changes made to the time keeping system could result in disciplinary action up to termination.

302 Breastfeeding and Nursing Mothers

ISTC provides two 15-minute breaks for all employees. Additional time will be provided to nurse or express breast milk for her nursing child for up to one year after the child's birth. ISTC will provide a comfortable, private area (shielded from view and free from intrusion) located at the workplace that is not a bathroom, also has a refrigerator for expressed milk. Expressed milk must be stored in a container clearly labeled with the mother's first and last name, telephone extension, and date. Containers with expressed milk with no date or with no name will be removed. Containers with expressed milk with dates over seven days old will be removed.

The length of the breaks will be reasonable and timed to best accommodate the nursing mother and her work schedule. If the amount of time needed is over 20 minutes, ISTC, at its discretion, can determine that the additional break time is unpaid time. A nursing mother may request a flexible work schedule that better accommodates breastfeeding and/or expressing breast milk for her child, including a part-time work schedule, if she is eligible.

303 Absentee and Punctuality Policy

An employee is expected to notify their immediate supervisor as soon as possible if the employee is unable to attend work. Any employee that is absent from work, or is sent home due to illness/injury, must notify their immediate supervisor as their condition changes. If the employee is unable to reach their immediate supervisor; employees should update Human Resources on their condition.

For absences associated with illness or injury, a physician's statement may be required before the employee returns to work in the following situations:

- Two or more consecutive days of absence.
- In all cases of work-related injury when the employee has been unable to work after the time of injury.
- When returning from an approved Family Medical Leave Act (FMLA) absence that was previously approved by your supervisor and Human Resources.

Physician's statements may be required at the request of management or supervisors as necessary.

304 Employee Benefits

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

Benefits eligibility is dependent upon employee category. Human Resources will identify the programs for which you are eligible.

ISTC reserves the right to amend or withdraw any benefit at any time. ISTC also retains sole discretion to determine if an employee is eligible for a specific benefit and to determine and interpret benefits on a case by case basis. The following benefit programs are available to eligible employees:

- Bereavement Leave
 - Holidays
 - Life Insurance
 - Health Insurance
 - Military Leave
 - Vacation Benefits
 - Witness Duty Leave
 - Cancer Policy
 - Short-Term Disability
 - Dental Insurance
 - Jury Duty Leave
 - Long-Term Disability
 - Medical Bridge
 - Sick Leave Benefits
 - Vision Care Plan
 - 401k Plan
 - Personal Time Off
-

305 Vacation Benefits

Vacation time off with pay is available to eligible employees to provide opportunities for rest, relaxation, and personal pursuits. Employees in the following employment classification(s) are eligible to earn and use vacation time as described in this policy:

* Regular full-time employees

The amount of paid vacation time an employee receives each year increases with the length of their employment as shown in the following schedule:

Service Eligibility	Vacation Days
Hire Year	Pro-rated 10 Days (after 90 days)
0-4 Years of Service	10 Days (80 Hours)
5-9 Years of Service	15 Days (120 Hours)
10-14 Years of Service	20 Days (160 Hours)
15-19 Years of Service	25 Days (200 Hours)
20+ Years of Service	30 Days (240 Hours)

Service Eligibility – The Service Eligibility as discussed above equates to the sum of the individual’s service years. Experienced professionals may receive additional service eligibility as discussed in the “Earned Vacation” clause.

Experienced professionals hired by ISTC with years of relevant professional experience may receive additional vacation benefits upon hire if approved by the Human Resources Department in consultation with the President/CEO.

Earned vacation may be deferred to the following year if approved by the President/CEO.

The length of eligible service is calculated on the basis of a “benefit year.” This is the 12-month period that begins when the employee enters under an eligible classification. An employee's benefit year may be extended for any significant leave of absence with the exception of military leave of absence; military leave has no effect on this calculation.

All anniversary years which will increase an employees earned vacation days will go into effect at the beginning of the calendar year. Employees do not have to wait until their actual anniversary date to receive the additional earned days.

Paid vacation time can be used in minimum increments of a full working day. To take vacation, employees should request advance approval from their supervisors. Requests will be reviewed based on a number of factors, including business needs and staffing requirements. Supervisors and/or department heads will have the right to deny the use of previously scheduled vacation hours based on business needs.

Vacation time off is paid at the employee's base pay rate at the time of vacation. It does not include overtime or any special forms of compensation such as incentives, commissions, bonuses, or shift differentials.

Upon resignation, two calendar weeks or more of notice is required in order for employees to be paid for unused accrued vacation time that has been earned through the last day of work. However, if ISTC terminates employment for cause, forfeiture of unused vacation time may result.

An employee may be allowed to carry over vacation days from one year to the next with approval from the President/CEO.

306 Holidays

ISTC will grant holiday time off to all employees on the following holidays:

- New Year's Day (January 1)
- Good Friday (Friday before Easter)
- Memorial Day (last Monday in May)
- Independence Day (July 4)
- Labor Day (first Monday in September)
- Thanksgiving (fourth Thursday in November)
- Day after Thanksgiving
- Christmas Eve (December 24)
- Christmas (December 25)
- Birthday (Floating)

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

To be eligible for holiday pay, employees must work the scheduled day before and the scheduled day after.

A recognized holiday that falls on a Saturday will be observed on the preceding Friday. A recognized holiday that falls on a Sunday will be observed on the following Monday.

If a recognized holiday falls during an eligible employee's planned paid absence (such as vacation or PTO), holiday pay will be provided instead of the paid time off benefit that would otherwise have applied.

If eligible, nonexempt employees work on a recognized holiday, they will receive holiday pay in addition to wages at their straight-time rate for the hours worked during the holiday.

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

Eligible employees will receive their birthday off as a paid holiday. Employees can use their birthday holiday as a floating day off to be used at another time. Scheduling of this holiday will be approved based on the needs of the business and staffing requirements.

307 Sick Time

Regular Full Time employees are eligible to earn 8 hours of sick time per month, beginning with their first full calendar month of employment.

Sick time is accrued on the last workday of the month. Employees must be in active pay status on the last day of the month to accrue a sick time for that month. An employee may accrue up to 360 hours of sick time (45 days), but cannot be compensated for any unused portion at time of termination.

Sick time may be taken in increments of 30 minutes. Sick time is designed to protect the earnings of the employee only during periods of sickness or injury to the employee or immediate family.

Time off for routine doctor or dentist appointments will be charged to sick time if time off is required for such appointments.

Physician's statements may be required at the request of management or supervisors as necessary.

308 Personal Time Off

Regular Full time employees may take time off from scheduled work for personal reasons with prior approval of their supervisor. A regular full time employee shall be allowed a maximum of sixteen (16) hours of paid time off for his/her personal reason each year. Personal Time Off can be taken in one (1) hour increments. Such paid leave may not be carried forward from year to year, nor paid off upon termination of employment.

309 Time Off to Vote

If employees are unable to vote in an election during their non-working hours, ISTC will grant up to 2 hours of paid time off to vote.

Employees should request time off to vote from their supervisor.

310 Bereavement Leave

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

ISTC defines "immediate family" for bereavement leave as the employee's spouse, parent, child, sibling, aunt, uncle, grandparent, or grandchild; the employee's spouse's parent, child, or sibling, aunt, uncle, grandparent, or grandchild and the employee's child's spouse.

Up to three (3) days of paid bereavement leave will be provided to full-time employees of ISTC.

Bereavement pay is calculated based on the base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials.

Approval of bereavement leave will be granted unless there are unusual business needs or staffing requirements. Employees may, with their supervisors' approval, use any available paid leave for additional time off as necessary. Please refer to unpaid leave policy if no paid leave is available.

311 Jury Duty

ISTC will pay employees on jury service their regular pay for the entire length of jury service.

Employees summoned to jury service must bring a copy of the summons to their supervisor when they receive it. This allows the supervisor to plan for the employee's absence.

Supervisors must grant leave to an employee summoned for jury service, but should contact the President/CEO if postponing the employee's service would avoid a business hardship.

Employees who are excused each day and dismissed from jury duty before their work shifts normally end should contact their supervisor.

Jury Duty pay will not be considered time worked for calculation of overtime pay.

312 Witness Duty

If employees have been subpoenaed or otherwise requested to testify as witnesses by ISTC, they will receive paid time off for the entire period of witness duty.

Employees will be granted 2 days paid time off to appear in court as a witness when requested by a party other than ISTC, unless subpoenaed by a government agency. Employees are free to use any available paid leave benefit (such as vacation leave or personal time off) to receive compensation for any additional time off needed.

The subpoena should be shown to the employee's supervisor immediately after it is received so that operating requirements can be adjusted, where necessary, to accommodate the employee's absence. The employee is expected to report for work whenever the court schedule permits.

313 Overtime

When operating requirements or other needs cannot be met during regular working hours, employees may be authorized to work overtime hours. When possible, advance notification of these mandatory assignments will be provided. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work.

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

ISTC will only pay overtime for time worked over forty hours per week.

314 Personal Appearance

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image ISTC presents to customers and visitors.

During business hours, employees are expected to present a clean and neat appearance and to dress according to the requirements of their positions. Employees who appear for work inappropriately dressed will be sent home and directed to return to work in proper attire. Under such circumstances, employees will not be compensated for the time away from work.

Employees with direct day-to-day contact with our customers (Customer Service, CBT Lab) are required to wear appropriate slacks/pants, in neutral colors, ISTC uniforms or casual dress tops.

Below are examples of clothing attire that is not appropriate during business hours.

- Spaghetti Straps / Strapless
 - Jeans of any color other than Fridays
 - Baseball caps / head gear
 - Revealing attire
 - Crocs / flip flops
 - Holey Jeans (even if they are made that way)
-

315 Meal Periods

All full-time Non-Exempt employees are provided with one meal period each workday. Supervisors will schedule meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time, except as operational requirements dictate.

400 Paydays

All employees are paid biweekly on every other Thursday. The payroll period begins on Monday and ends on Sunday. Each paycheck will include earnings for all work performed through the end of the previous payroll period.

In the event that a regularly scheduled payday falls on a day off such as a weekend or holiday, employees will be paid either on the last day of work before the regularly scheduled payday or the first day following the holiday.

Direct Deposit is required for all new hire employees. Changes or corrections to your deposit information should be reported to the Human Resource Department as soon as possible.

401 Employment Termination

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

- Resignation—voluntary employment termination initiated by an employee
- Termination—involuntary employment termination initiated by ISTC
- Layoff—involuntary employment termination initiated by ISTC for no disciplinary reasons

If you wish to resign, we ask that you notify your supervisor of your anticipated departure date at least two weeks in advance. Of course, as much notice as possible is appreciated by Industrial Safety Training Council and your co-workers. This notice should be in the form of a written statement.

If you fail to report to work for three consecutive days without informing management of the planned absence, we consider you resigned.

In the case of termination due to resignation, retirement or a permanent reduction in the work force, your accrued vacation pay will be paid on a pro-rated basis. Unused personal time is not paid upon termination. In the case of termination, any vacation or personal/sick time used in excess of accrued time will be deducted from your final paycheck given your prior written permission.

Furthermore, any outstanding financial obligations owed to Industrial Safety Training Council will also be deducted from your final check, given your prior written permission. If your final check does not sufficiently cover the money owed to the company, you will remain liable for that amount.

If you leave in good standing, you may be considered for re-employment.

Except as required by law or by separate agreement, employee salary and benefits will end on the date of termination.

Upon resigning/termination from Industrial Safety Training Council, you should continue to provide the company with an accurate address for at least one year for tax purposes. At termination from ISTC, you are required to return all property (keys, any equipment, phone, computers, etc.) to ISTC.

402 Administrative Pay Corrections

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

In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of the Human Resource Department so that corrections can be made as quickly as possible.

403 Pay Deductions

The law requires that ISTC make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. Eligible employees may voluntarily authorize deductions from their pay checks.

If you have questions concerning why deductions were made from your pay check or how they were calculated, Human Resources can assist in having your questions answered.

404 Business Travel

Overview

ISTC will either prepay or reimburse employees for all necessary and reasonable expenditures in connection with travel, entertainment, or planned meetings incurred on ISTC's behalf. ISTC will either prepay or reimburse only actual expenses incurred that have a business purpose which have been approved by the employee's supervisor. Accurate reporting of such expenditures is essential. ISTC intends that the method of reporting will satisfy Internal Revenue Service regulations. Exceptions to ISTC's policy should be approved by the President/CEO.

Employees seeking prepayment or reimbursement should incur the lowest reasonable travel expenses and use travel discounts when available. All business-related travel paid with ISTC funds must comply with company expenditure policies.

Authorization and Responsibility

Official employee travel must be authorized by the employees' supervisor or the President/CEO. Employees should verify that scheduled travel is eligible for reimbursement before making travel arrangements.

The traveler must submit an ISTC Expense Report and all required supporting documentation within 30 days of completing the official travel to obtain reimbursement of expenses.

Expense Reports must be signed by the traveler, initialed by the traveler's supervisor, and then approved by the President/CEO before payment is released. (Note: Expense Reports for the President/CEO shall be approved by the Chairman of the Board or Member of the Executive Committee.)

Personal Funds. ISTC reserves the right to deny reimbursement of travel-related expenses for failure to comply with policies and procedures. Travelers should review reimbursement guidelines before spending personal funds for business travel to determine if such expenses are reimbursable. Travelers who use personal funds to facilitate travel arrangements will not be reimbursed until after the trip occurs and proper documentation is submitted.

Vacation in Conjunction with Business Travel. When vacation time is added to a business trip, any cost variance in airfare, car rental, or lodging must be clearly identified on the travel

request. ISTC will not prepay any personal expenses with the intention of being “repaid” at a later time, nor will any personal expenses be reimbursed.

Exceptions to the Policy. Occasionally, it may be necessary for travelers to request exceptions to this travel policy. All requests for exceptions to the policy must be made in writing and approved by the President/CEO.

Travel (General Guidance)

Airfare. Travelers are expected to obtain the lowest available airfare that reasonably meets business travel needs. First-class tickets are not reimbursable unless authorized by the President/CEO. Coach class or economy tickets must be purchased for domestic or international flights (defined as flight time totaling less than five consecutive hours excluding layovers). A higher-priced coach ticket cannot be purchased for a subsequent upgrade in seating. A less-than-first-class ticket (i.e., business class) may be purchased at ISTC’s discretion for domestic or international flights (defined as flight time exceeding five consecutive hours excluding layovers).

Rail Transportation. When necessary, ISTC may approve rail transportation provided that the cost does not exceed the cost of the least expensive airfare.

Automobile (Personally Owned Vehicle). A valid driver’s license issued within the United States and personal automobile insurance are required. Drivers should be aware of the extent of coverage (if any) provided by his or her automobile insurance company for travel that is business or not personal in nature. Reimbursement for use of a personal automobile is based on the Internal Revenue Service (IRS) issued rate. If several ISTC employees travel using one vehicle, the IRS issued rate reimbursement will be authorized to the owner of the vehicle only. Distances used for calculation will be obtained by using Google Maps. If variations exist between reported mileage and mileage obtained from Google Maps, those variations will be reconciled by the President/CEO.

Automobile (Rental). A commercial rental vehicle as a primary mode of transportation is authorized only if the rental vehicle is more economical than any other type of public transportation, or if the destination is not otherwise accessible. ISTC authorizes rental of the most economic vehicle available. In certain circumstances larger vehicles may be rented when required. Drivers must adhere to the rental requirements and restrictions must be followed.

ISTC encourages travelers to purchase collision damage waiver (CDW) and loss damage waiver (LDW) coverage; all other insurance reimbursements will be denied. Drivers should be aware of

the extent of a coverage (if any) provided by their automobile insurance company for travel that is business or not personal in nature.

Travelers are encouraged to fill the gas tank before returning the vehicle to the rental agency to avoid service fees and more expensive fuel rates.

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

Lodging. ISTC approves lodging expenses at single occupancy or standard business room rates. Variations to this require the approval of the President/CEO.

Conference Registration Fees. If required, ISTC will pay conference registration fees and business-related banquets/meal fees considered part of a conference.

Meals (Per Diem). ISTC per diem rates are based on the U.S. General Services Administration Guidelines, which vary by city location. In addition to meals, these rates include incidental expenses such as laundry, dry cleaning and service tips (e.g., housekeeping or porter tips). Per diem reimbursements are based on departure and return times over the entire 24-hour day and are prorated accordingly.

Authorized Entertainment or Planned Business Meetings. Expenses for meals will not be reimbursed at the employee's regular place of business unless included in an expenditure for authorized entertainment or planned business meetings.

ISTC recognizes there is a need for a reasonable amount of entertainment of customers and other persons in connection with daily business. To qualify entertainment expenses as a business deduction, the Internal Revenue Code indicates the explanation should include name, title, and company affiliation of all persons entertained, (including ISTC employees or Board members) along with the business purpose, amount, and type of entertainment for each expenditure. Entertainment expenditures should not be incurred unless the particular entertainment is authorized by the employee's supervisor or the employee has been given authority to entertain business guests as part of their normal business function. Only expenses directly associated with a specific entertainment activity may be reimbursed as entertainment expense.

When one charge includes expenses for other ISTC employees, such as the cost of a business meeting or entertainment involving several employees, the name of such other ISTC employees participating must be furnished as support for the expenditure.

Travel Expenses (Prepayments)

General Information. Authorized business travel for employees that includes prepayments must be pre-approved by the traveler's supervisor and President/CEO. These prepayments will be paid by either the traveler's supervisor or the Accounting Department.

Travel advances are processed by submitting a completed Expense Advance request to your supervisor and then to the Accounting Department. Reimbursement for any remaining expenses is processed on an Expense Report and submitted via your supervisor.

Approved Prepaid Travel Expenses. The following are approved prepaid travel expenses:

- Airfare. ISTC will prepay for airfare when required.
- Rail Transportation. ISTC will prepay rail transportation provided that the cost does not exceed the cost of the least expensive airfare.
- Rental Vehicles. ISTC will prepay for approved use of a rental vehicle when required.
- Lodging. ISTC will prepay for lodging when required.
- Conference Registration Fees. ISTC will prepay conference registration fees and banquet/meal fees that are considered part of a conference.
- Cash advances (Per Diem). ISTC will provide cash advances for specific situations that might cause undue financial hardship for business travelers. For Meals and Incidentals these amounts will be based on current Per Diem rates.

Reconciliation of Prepayments. Expenses associated with the travel must be reconciled and substantiated within 30 days of the completion of travel. This is accomplished by the traveler completing an Expense Report and providing documentation/receipts that account for the prepayments. The traveler must repay ISTC for any cash advances in excess of the approved reimbursable expenses. If the traveler does not repay ISTC, the excess amount will be reported as taxable income on the employees W-2 Form.

Travel Expenses (Reimbursable)

General Information. Requests for reimbursements of travel-related expenses are submitted on an ISTC Expense Report form with required supporting documentation. This form must be submitted to the Accounting Department via your supervisor within 30 days of the completion of travel.

Travel Expenses (Reimbursable). The following items associated with business travel are reimbursable by ISTC:

- Airfare. If not prepaid by ISTC, airfare is reimbursable.
- Rail transportation. If not prepaid by ISTC, rail transportation is reimbursable.
- Automobile (personally owned vehicle). Reimbursement for use of a personal automobile is based on the Internal Revenue Service (IRS) issued rate. Distances used for calculation will be obtained by using Google Maps. If variations exist between reported mileage and mileage obtained from Google Maps, the variations will be finalized by the President/CEO.
- Automobile (rental). If not prepaid by ISTC, a rental car is reimbursable.
- Conference registration fees. If not prepaid by ISTC, conference fees are reimbursable.
- Lodging. If not prepaid by ISTC, lodging costs are reimbursable.
- Parking. Parking fees (including airport parking) are reimbursable.
- Tolls. Bridge and road tolls are reimbursable.
- Business Expenses. Business expenses, including faxes, photocopies, internet charges, data ports and business telephone calls incurred while on travel status are reimbursable.
- Business Telephone Calls. Business telephone calls are reimbursable.
- Miscellaneous Transportation. Uber, Lyft, taxi, bus, subway, Metro, ferry and other modes of transportation are reimbursable.
- Entertainment and Planned Business Meetings. Entertainment and planned business meetings are reimbursable if they meet the criteria noted in the previous section titled (Authorized Entertainment or Planned Business Meetings)
- Meals. A meal is reimbursable if the following criteria is met:
 - The employee is away from home overnight due to business.
 - The meal is served in conjunction with a specific business purpose.

Travel Expenses (Non Reimbursable). The following items that may be associated with business travel will not be reimbursed by ISTC:

- Airline club memberships.
 - Airline upgrades.
 - Child care, babysitting, house-sitting, or pet-sitting/kennel charges.
 - Costs incurred by traveler's failure to cancel travel or hotel reservations.
 - Personal entertainment expenses, including in-flight movies, headsets, health club facilities, hotel pay-per-view movies, in-theater movies, social activities and related incidental costs.
 - Travel accident insurance premiums or purchase of additional travel insurance.
 - Other expenses not directly related to the business travel.
-

Travel for Non-Employees. Additional costs for travel, lodging, meals or other travel expenses for spouses or other family members will not be reimbursed unless the individual(s) has a bona fide purpose for engaging in the travel or attending the event. Such travel is generally limited to senior management and should occur infrequently.

Expense Report Procedures

All expenditures should be recorded on the ISTC Expense Report form and submitted within 30 days of completing the official travel.

The following are general expense reporting procedures:

- Expenses should be listed by date rather than by grouping. Grouping makes the verification of expenses problematic.
- The cash balance section of the expense report should always be completed and prompt settlement of any unused advance funds should be made when the expense report is submitted.
- When two or more employees travel together, cost should be individually reported. If one person pays for another's expenses and includes the total cost on their report, names of such other employees should be shown.
- Attach all available receipts and include them with the Expense Report.
- Sign and date the Expense Report before submitting it to your supervisor.

Administration

Employees should contact their supervisor for guidance and assistance on procedures related to travel arrangements, expense reports, reimbursement for specific expenses, or any other business travel issues.

Falsifying expense reports to reflect costs not incurred by the employee may be grounds for disciplinary action, up to and including termination of employment.

405 Benefits Continuation (COBRA)

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under ISTC's health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under COBRA, the employee or beneficiary pays the full cost of coverage at ISTC's group rates plus an administration fee. ISTC provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under ISTC's health insurance plan. The notice contains important information about the employee's rights and obligations.

406 Military Family FMLA/Protected Military Leave (USERRA)

Military Family and Caregiver Leave under FMLA

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings. Contact Human Resources regarding your need for this leave.

Protected Military Leave (USERRA)

Under the Uniformed Services Employment and Reemployment Rights Act of 1997 (USERRA), you have the right to be reemployed in your job if you leave to perform service in the uniformed service and you ensure that your employer receives advance written or verbal notice of your service, you have five years or less of cumulative service in the uniformed services while working for ISTC, you return to work or apply for reemployment in a timely manner after conclusion of service, and you have not been separated from service with a disqualifying discharge or under other than honorable conditions. If you are eligible to be reemployed, you will be restored to the job and benefits you would have attained if you had not been absent due to military service or, in some cases, to a comparable job. You may also have rights provided by state law, which also protect state militia.

If you: 1) are a past or present member of the uniformed service; 2) have applied for membership in the uniformed service; or 3) are obligated to serve in the uniformed service; then you will not be denied initial employment, reemployment, retention in employment, promotion, or any benefit of employment because of this status. In addition, no employee may

retaliate against anyone assisting in the enforcement of USERRA rights, including testifying or making a statement in connection with a proceeding under USERRA, even if that employee has no service connection.

If you leave your job to perform military service, you have the right to elect to continue your existing ISTC-based health plan coverage for you and your dependents for up to 24 months while in the military. Even if you do not elect to continue coverage during your military service, you have the right to be reinstated in ISTC health plan when you are reemployed, generally without any waiting periods or exclusions (e.g., pre-existing condition exclusions) except for service-connected illnesses or injuries.

Military leave is unpaid; however, employees may obtain pay for accrued and unused vacation leave during the absence. Eligible employees on military leave will receive pay for any holidays that occur during the leave, but do not accrue vacation leave.

Employees who currently serve in the U.S. uniformed services are eligible for benefits per The U. S. Department of Labor's Veterans' Employment and Training Service (VETS) administers the Uniformed Services Employment and Reemployment Rights Act (USERRA).

The U. S. Department of Labor's Veterans' Employment and Training Service (VETS) administers the Uniformed Services Employment and Reemployment Rights Act (USERRA). Subject to the rules and exceptions, USERRA guarantees an employee returning from military service or training the right to be reemployed at his or her former job (or as nearly comparable a job as possible) with the same benefits.

The Uniformed Services Employment and Reemployment Rights Act of 1994, enacted October 13, 1994 (title 38 U.S. code, Chapter 43, Sections 4301-4335, Public Law 103-353), as amended, provides for the employment and reemployment rights for all uniformed service members.

Reemployment rights extend to persons who have been absent from a position of employment because of "service in the uniformed services." "Service in the uniformed services" means the performance of duty on a voluntary or involuntary basis in a uniformed service, including:

Active duty and active duty for training;

Initial active duty for training;

Inactive duty training;

Full-time National Guard duty;

Absence from work for an examination to determine a person's fitness for any of the above types of duty;

Funeral honors duty performed by National Guard or Reserve members;

Duty performed by intermittent employees of the National Disaster Medical System (NDMS), which is part of the Department of Health and Human Service, when activated for a public health emergency, and approved training to prepare for such service.

The “uniformed services” consist of the following

Army, Navy, Marine Corps, Air Force and Coast Guard;

Army Reserve, Naval Reserve, Marine Corps Reserve, Air Force Reserve and Coast Guard Reserve;

Army National Guard and Air National Guard; and

Commissioned Corps of the Public Health Service.

Any other category of person designed by the President in time of war or emergency

Employees who have questions concerning military leave or its impact upon their benefits should contact Human Resources.

407 Family Medical Leave of Absence

This is intended as an overview only. The regulations, which construe the Family and Medical Leave Act, may be consulted for a final determination of your rights and responsibilities as well as those of ISTC. If you need leave, notify your immediate Supervisor and contact Human Resources to obtain a copy of the Family and Medical Leave Act Information Sheet. Human Resources will also provide Form WH-380, which is to be used when requesting leave. This policy explains when and whether you will be entitled to be restored to your position, or job protection, if you need leave for the reasons described herein. The Act does not require that you be paid while you are absent from work. However, ISTC will require that you use any accrued unused sick time, PTO, and vacation, if any, while you are on family/medical leave.

Eligibility. You must be requesting leave: 1) for the birth of your child; 2) for placement of an adopted or foster child with you as the parent; 3) to care for your child (biological, adopted, foster, or other child to whom you are functioning as the parent), spouse, or parent who has a serious health condition; or 4) because you have a serious health condition. (See also Military Family and Caregiver Leave.) General examples of what the FMLA categorizes as a "serious health condition," include an illness, injury, impairment, or physical or mental condition that involves: (1) inpatient (overnight) care; (2) continuing treatment by a health care provider, including a period of incapacity when you are unable to perform the essential functions of your job or other regular daily activities; and (3) any period of incapacity due to pregnancy, or for prenatal care; as well as the recuperative period from such conditions.

You are not eligible for family/medical leave to care for an in-law, but you may be eligible to use leave to care for your biological, adopted, or foster child, as well as a child for whom you are a legal guardian or can show you are functioning as a parent. ISTC may require proof of your relationship to the person who has a serious health condition to determine your qualification for leave. A spouse may be a person with whom you are in a common law marriage or ceremonially married. If you have a question about whether you may be granted leave for a person whom you claim is a spouse or child for whom you are entitled to FML, please contact Human Resources for assistance.

On or before the first day of the requested leave, you must have: 1) completed a total of at least twelve (12) months of service to ISTC, including all periods of employment; 2) worked at least 1,250 hours during the preceding twelve (12) month period; and 3) work at a ISTC location which employs at least 50 employees, or is located within 75 miles of other ISTC locations where at least 50 employees work. With the exception of a break in employment of more than seven years not related to military service, all periods when you have been maintained on ISTC's payroll will be considered together to determine whether you have been employed for at least 52 weeks. Pursuant to USERRA, an employee returning from fulfilling his or her National

Guard or Reserve military obligation shall be credited with the hours that would have been worked for the employer added to any hours actually worked during the previous 12-month period to meet the 1,250 hour requirement, based on the employee's pre-service work schedule.

The maximum amount of leave to which you may be entitled is twelve (12) weeks in a rolling twelve-month period, as determined by this policy, even if there are multiple qualifying events. When determining whether you are entitled to leave, ISTC determines the 12-month period by using the "rolling" method, which means the 12-month period is measured backward from the date an employee uses any FMLA leave. This means each time you take family/medical leave the remaining amount of the 12-weeks of leave to which you are entitled becomes the balance of the 12 weeks, which has not been used during the immediately preceding 12 months. For instance, if you use four (4) weeks of leave beginning February 1, 2004, four weeks beginning June 1, 2004, and four weeks beginning December 1, 2004, you will not be entitled to any additional leave until February 2, 2005. On February 2, 2005, you will have one day of leave because counting back 12-months, the leave used on February 1, 2004 would be eliminated. On February 3, 2005, you will be eligible for another day and so on. As you move forward each day, one day used leave from 12 months ago is eliminated and is thus not counted toward your total 12-week entitlement. Your failure to return to work after the leave provided under this section expires may result in loss of your position.

Employee Responsibilities. Each request for leave will be examined on a case-by-case basis to determine whether the eligibility requirements have been met. Until such time as you have complied with all requirements and a final determination has been made, your leave may be conditionally designated as family/medical leave, subject to change.

Unless the reason you need the leave is unexpected, you must notify your Supervisor at least 30 calendar days before you want to begin leave. If the need for leave is unexpected, you must provide notice as soon as you can. When planning medical treatment, you are expected to consult in advance with your Supervisor to make a reasonable effort to schedule leave when it will not unduly disrupt ISTC operations.

In addition to providing notice, you must provide medical certification from the health care provider of the person whose serious medical condition is the reason for your request for leave. Obtain a WH-380 Form from Human Resources and a copy of your job description to submit to the treating doctor for completion, and then submit the completed WH-380 Form to Human Resources. The certification is required at the time you request the leave, but no less than 15 calendar days after you request the leave. You are responsible for paying any charges required by your health care provider for completing the certification. The certification must be fully completed and signed by the health care provider who is treating the condition. Because health care providers may delay the completion of these certifications, you are cautioned to request the certification as soon as you are aware of the potential need for leave, and to follow-up with the health care provider until the certification is received.

If you fail to provide certification as required, you may lose your right to take leave and/or job protection under the FMLA. If you fail to give 30 days' notice for foreseeable leave with no reasonable excuse for the delay, ISTC may delay your leave until at least 30 days after the date you provide the notice. Calls from relatives and others will be accepted only in emergency situations, and you are still responsible for calling your immediate Supervisor as soon as you are able.

If an employee returns to work from an absence which qualified for family/medical leave but the absence has not been designated as family/medical leave by ISTC, you must notify Human Resources within two (2) work days of returning to work that you desire the absence to be counted as family/medical leave. ISTC may designate absences as family/medical leave until it receives the required certification. If ISTC was unaware of a qualifying event that occurred during time off not designated as FML, ISTC may designate such time as FML when it learns.

ISTC reserves the right to require a second opinion examination conducted by a healthcare provider of ISTC's choice who treats the condition causing the need for leave and will pay for the second opinion. If the second opinion does not agree with your doctor's certification, ISTC may pay for you to be examined by a third healthcare provider selected jointly by you and ISTC, and will also pay for this examination. The third healthcare provider's opinion will be used to determine if you are eligible for family/medical leave.

For pregnancy, chronic or permanent/long-term conditions, and recovery periods, ISTC may require subsequent recertification, at your expense, after 30 days and not more frequently than every 30 days thereafter. Recertification may also be required if: (a) you request to extend the leave; (b) circumstances described by the original certification have changed significantly; (c) ISTC receives information that casts doubt on the validity of the certification relied upon for the leave; or (e) you are unable to return from leave because of the continuation, recurrence, or onset of a serious health condition. Recertification (using a new Form WH-380) must also be provided within 15 calendar days from the date of the request.

Intermittent Leave/Reduced Work Schedule. When your doctor has released you for work, but states it is medically necessary, you may take family/medical leave on an intermittent basis or work a reduced schedule. Intermittent leave is FMLA leave taken in separate blocks of time due to a single qualifying reason. A reduced leave schedule is a leave schedule that reduces an employee's usual number of working hours per workweek, or hours per workday. A reduced leave schedule is a change in the employee's schedule for a period of time, normally from full-time to part-time. When an employee takes leave on an intermittent or reduced leave schedule, only the amount of leave actually taken will be counted toward the employee's leave entitlement.

Arrangements should be made with your Supervisor so that business operations are not unduly disrupted. When the need to work intermittently or on a reduced schedule has ended, you will be returned to your prior position, if you have not exhausted your family/medical leave.

Benefits during Leave. ISTC will continue your coverage under the employee health plan, if any, if you are enrolled prior to the leave, and on the same basis as prior to the leave. You will still be responsible for paying any portion of the premiums that you paid before leave. However, ISTC's obligation to maintain health plan coverage ceases if your premium is more than 30 days late. You should make the arrangements, such as when you will pay and how much you will owe for continuing your insurance coverage, prior to taking leave. Contact Human Resources for assistance.

If you lose your health insurance coverage due to failure to pay timely or choose to forfeit coverage during your family medical leave, you will be reinstated on the same terms as prior to taking the leave, including family or dependent coverages, without any qualifying period, physical examination, exclusion of pre-existing conditions, etc. upon return to work. If ISTC has paid any premiums (representing your portion) during your unpaid leave, you will be expected to reimburse those payments.

Family/medical leave will only be paid, if you have accrued, unused vacation and sick leave. Vacation leave, sick leave and other benefits will not accrue during any unpaid portion of the leave, but you will not lose your seniority and benefits which were accrued prior to your leave, unless you fail to return from your leave when it expires or your need for leave exceeds twelve (12) weeks, as calculated by this policy. However, you are required to use all paid accrued leave while you are on family/medical leave. Holidays occurring on weekdays during your family/medical leave will be counted as normal workdays against your entitlement to family/medical leave. Time not worked because of leave taken under this policy will not be counted against an employee's attendance record.

Key Employee. If you are a salaried FMLA-eligible employee who is among the highest paid 10 percent of all the employees employed by ISTC within 75 miles of your worksite, you are considered a "key employee." ISTC may deny job restoration to key employees, if such denial is necessary to prevent substantial and grievous economic injury to ISTC's operations. If ISTC considers you to be a key employee, it will notify you of whether it will deny your reinstatement, and in such notice provide a description of the reasons upon which it relies for the denial.

Returning to Work. Assuming your position is still existent and necessary when you are ready to return to work, you will be placed in the position you left or you may be placed in an equivalent position with equivalent pay, benefits, and other terms and conditions of employment, if your physician determines that you can perform the job with or without reasonable accommodation that do not result in an undue hardship to ISTC. At least three (3) work days before you intend to return to work, you must notify your Supervisor or Human Resources that the need for leave has ended and provide medical certification from your treating physician that you are released to return to work and whether you can perform the essential functions of your job with or without reasonable accommodations. If your doctor has placed restrictions on your work, it will be necessary for Human Resources to determine whether and how your restrictions can be

accommodated without undue hardship to ISTC. Failure to notify your Supervisor or Human Resources in advance may delay your return to work. You must pay the cost for obtaining this certification. If you fail to provide the required fitness-for-duty certification, your return to work may be delayed until you provide it. Failure to return to work within three (3) days after being released by your treating physician may result in your absence being treated as a voluntary quit.

Harassment and Retaliation. You may not be harassed for exercising your rights to family/medical leave. If you feel that you have been harassed or that someone is retaliating against you because you have exercised any right described in this policy, you are required to advise your Supervisor, unless that person is the one about which you are complaining. If that is the case, report the matter to Human Resources. Harassment and retaliation against employees who attempt to exercise their rights under this policy will not be tolerated, and may subject the harassing party to disciplinary action, up to and including termination. However, while you are attempting to exercise your rights under this policy, you remain subject to disciplinary measures for your failure to follow ISTC procedures and policies relating to your conduct and work performance.

Extension of Leave as a Reasonable Accommodation. Employees who exhaust their family/medical leave taken for their own serious health condition may qualify for a reasonable extension of their leave under the Americans with Disabilities Act ("ADA"). To qualify for such a reasonable extension of leave, an employee must (1) request the extension prior to exhaustion of their FMLA leave and (2) provide ISTC with medical certification from their treating physician that:

- (a) The employee has a physical or medical impairment that substantially limits a major life activity (temporary, non-chronic impairments (e.g., broken bones, pregnancy, appendicitis, and non-chronic infections) typically do not qualify as disabilities); and
- (b) A supplemental leave of a specified duration will permit the employee to return to work in the near future and perform the essential function of his/her job; and
- (c) There is no other reasonable accommodation that would allow the employee to return to work and perform the essential functions of his/her job.

ISTC will evaluate timely requests submitted by employees on an individualized basis and grant reasonable extensions of leave in compliance with the ADA and other applicable laws.

For additional questions regarding FMLA benefits, contact Human Resources.

500 Confidential Information

The leaking, theft or inadvertent release of confidential information represents one of the greatest dangers any business faces when permitting internet access to employees.

Confidential information should only be accessed or shared among authorized personnel, whether internal or external.

When sharing this data, secure methods such as encryption and permissions should be used. Employees must never e-mail unauthorized confidential data or ship it to someone on an unsecured USB flash drive.

Personal use USB drives and other media devices are prohibited unless approved by the IT department.

Confidential data must be secured while “at rest.” Standard physical and digital access controls include file servers behind locked doors with access provided only to appropriate personnel.

501 Personal Device Usage

The unauthorized use of personal cell phones, smart watches, tablets, iPods or any personal electronic device during working hours is not permitted. This includes listening to music, surfing the internet and/or access to social media sites. Violation of this policy may result in disciplinary action, up to and including termination.

502 Use of Equipment

When using ISTC property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Please notify the supervisor if any equipment, machines, or tools appear to be damaged, defective, or in need of repair.

503 Internet

ISTC provides internet access as required for the performance and fulfillment of job responsibilities.

Occasional and reasonable personal use of ISTC's internet services is permitted, provided the personal use does not interfere with work performance.

Employees should not assume any guarantee of privacy if accessing the internet via ISTC systems and should expect to be subject to monitoring and review.

All employee internet access should be consistent with professional conduct.

Under no circumstances should ISTC's internet services be used for accessing, downloading, uploading, saving, receiving or sending material that includes sexually explicit content or other material using vulgar, sexist, racist, threatening, violent or defamatory language, nor should users employ ISTC's internet services to disclose corporate information without prior authorization.

Using ISTC's internet services to gamble, operate a personal business, or engaging in "hacking" or other illegal activities is prohibited.

All employees who access the internet should keep in mind they are representatives of ISTC, whether in person or online.

504 Email

Users are forbidden from using ISTC's e-mail system and other resources for charitable endeavors, private business activities or amusement/entertainment purposes. Employees are reminded that the use of corporate resources, including e-mail should never create either the appearance or the reality of inappropriate use.

Personal use of the organization's e-mail services is not encouraged, since there is a number of free alternatives available (Gmail, Yahoo, etc.). Employees are urged to keep business and personal e-mail separate. Sending personal e-mail messages on occasion is not subject for concern so long as the content is appropriate and all guidelines in this presentation (and accompanying policy) are followed.

Electronic communications systems and all messages generated on or handled by electronic communications systems, including back-up copies, are considered organization property and are not the property of users of the electronic communications services. Employees departing the company shall not be permitted to take any stored e-mails, calendar appointments or contacts with them.

The IT department may be asked to review e-mail messages if there is a concern about data breaches or privacy leaks. This can take place with or without advanced warning.

Users may send and receive e-mail attachments that do not exceed 10 MB in size, provided that all attachments are scanned and confirmed to be virus free (using the organization's authorized antivirus application) before being sent or opened.

The organization's electronic communications systems are not encrypted by default, which means electronic message communications are not secure and could be accessed by other parties. If sensitive information must be sent by electronic communications systems, encryption or similar technologies to protect the data must be employed. Contact the IT department if this requirement is needed.

Employees may not intercept or disclose, or assist in intercepting or disclosing, electronic communications. The organization is committed to respecting the rights of its employees, including their reasonable expectation of privacy. Recognizing that some information is intended for specific individuals and may not be appropriate for general distribution, electronic communications users should exercise caution when forwarding messages.

Blanket forwarding of messages to parties outside the organization, and the mass distribution of unsolicited e-mail messages, is prohibited.

Regardless of the circumstances, individual passwords must never be shared or revealed to anyone. To do so exposes the authorized user to responsibility for actions the other

party takes with the password. If a password must be provided (such as to a new user working remotely) do so over the phone so their identity can be confirmed.

Users should never click on suspicious links in email messages; if you hover the mouse cursor over them this will often reveal the true address.

Users should never respond to spam/unsolicited offers from strangers.

505 Social Media

Access to social media (Facebook, Twitter, Instagram, company blogs, digital press releases, etc.) for purposes benefiting the organization shall be provided only to authorized ISTC personnel.

As with personal internet access, personal use of social media is acceptable as long as it involves professional conduct, appropriate content, and does not impede an employee's ability to perform their work.

Any comment posted to any social media platform regarding ISTC, vendors, owners, contractors, trainees or persons with any affiliation to ISTC may be subject to review, and, unless they are complaints otherwise protected by State or Federal law, possible disciplinary action up to and including immediate termination.

Employees should never post, refer to, tag or reveal company activities or personnel on social media without prior authorization from their supervisor/HR. Examples include tagging coworkers at a business event on Facebook or discussing an upcoming product not yet cleared for public announcement.

506 Streaming Media

Streaming media - such as the kind viewed using web browsers connecting to Youtube and other sites or which are played via dedicated local client applications - should be used only as necessary for fulfilling job responsibilities.

Using ISTC wireless networks to stream media to a personal device is also prohibited, unless otherwise approved through the proper channels.

Streaming media broadcasts can consume significant network bandwidth and can delay access to and/or prevent other employees from accessing legitimate business resources and completing business-critical tasks. Therefore, streaming media broadcasts unassociated with fulfilling workplace responsibilities are prohibited.

In order to ensure that the organization's resources are used properly and to minimize costs, organizational employees are responsible for ensuring that the streaming audio and video files they download over the company network and store on company systems should be removed when no longer needed.

507 Software Policy

ISTC's IT department is responsible for purchasing, installing and supporting software programs and applications. ISTC's IT department is also responsible for maintaining license compliance for all operating systems and applications installed on organization-owned systems.

In order to prevent incompatibilities, the introduction of viruses, spyware, malicious programs and worms, and deployment of pirated software, unintentional or otherwise, all users are prohibited from downloading unauthorized software programs. Even if a user owns a software application and the original license and installation media, employees are prohibited from installing unauthorized software, operating systems, alternative Internet browsers, add-ons, programs, toolbars, and applications.

ISTC's IT department is responsible for testing and deploying service packs, patches and updates. Users are prohibited from installing such updates unless instructed or assisted by ISTC's IT department.

Requests for software installation should be addressed to ISTC's IT department.

This software policy applies to all servers, workstations, laptops and mobile devices..

508 Driving While Communicating

It is against ISTC's policy for any employee on ISTC's business or operating an ISTC vehicle to text, email, check messages or otherwise use a cell phone, tablet computer, laptop computer, or other communication device while driving. Unless you have a hands-free device for your phone, you must exit the roadway and stop your vehicle to answer or speak on the phone. Violations of this policy will result in discipline up to and including termination.

509 Driving Employees

If you drive on company business, you are required to maintain a valid driver's license and must maintain the state-mandated minimum liability coverage on your automobile. Only employees are permitted to drive vehicles being used for company business.

The company may periodically audit an employee's driving record and/or driver's license for compliance with this policy or to determine whether the employee is currently licensed to drive.

Any driving record that establishes a pattern of unsafe driving practices that may endanger the employee or clients, or impact the employee's ability to perform his or her job duties, could subject the employee to disciplinary action.

Employees who drive their own vehicle must maintain at least the state required minimum automobile liability insurance. Additionally, such employees must maintain their driver's license and vehicle inspection stickers in current status, and abide by any restrictions required for licensing.

No driver may pick up or transport non-employees while on ISTC business, unless there is a work-related need to do so. Any illegal, dangerous, or other questionable conduct while driving that would tend to place the lives or property of others at risk is prohibited.

Any accident involving the operation of a motor vehicle can affect a driving employee's fitness for duty or insurability as a driving employee. Regardless of fault, circumstance, on-or-off-duty status, time, or place, if your job duties include driving, you must immediately report any traffic citation to your Supervisor or to Human Resources. You must also promptly report the details of the incident and the outcome of any citation you received. If requested, provide official certification that you remain qualified to drive a vehicle and are insurable.

If an accident occurs during working hours and you were working, you must cooperate fully with ISTC in verifying all information with other parties involved and law enforcement authorities and with ISTC's insurance representative in the investigation and handling of the incident.

You are responsible for prompt payment of all driving citations. You will be held responsible for prompt and complete payment of all parking tickets and traffic citations related to your driving.

510 Company Car Policy

ISTC provides vehicles for business use and provides reimbursement for business use of personal vehicles according to the following guidelines. ISTC retains the right to amend or terminate this Policy at any time.

1. ISTC employees may not drive any business vehicles without prior approval. Before being approved to operate a Company vehicle, an employee's driving records will be reviewed, with consent of the employee, and the existence of a valid driver's license will be verified. Employees approved to drive on Company business are required to inform of any changes that may affect their legal or physical ability to drive or their continued insurability.
 2. Employees holding jobs requiring regular driving for business as an essential job function, as a condition of employment, must always be able to meet the driver approval standards of this policy. For all other jobs, driving is considered only an incidental function of the position, and approval to operate a Company vehicle or drive for business will be determined on an as-needed basis.
 3. If possible, Company vehicles will be permanently assigned to departments that have demonstrated a continued need for them. Additional vehicles are maintained in a motor pool for use by individual employees, as needed.
 4. Employees who need transportation in the course of their normal work may be assigned a Company vehicle for their use. All other employees needing transportation for Company business may use vehicles assigned to their department or drawn from the motor pool. As a last resort, when no Company vehicles are available, employees may use their own vehicles for business purposes with prior approval.
 5. Employees who drive a vehicle on Company business must, in addition to meeting the approval requirements above, exercise due diligence to drive safely and maintain the security of the vehicle and its contents. Employees are also responsible for any driving infractions or fines that occur as a result of their driving.
 6. Employees who use their personal vehicles for approved business purposes will receive a mileage allowance equal to the Internal Revenue Service optional mileage allowance for such usage. This allowance is to compensate for the cost of gasoline, oil, depreciation and insurance. Employees who operate personal vehicles for Company business should obtain auto liability coverage for bodily injury and property damage with a special endorsement
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for business use, when necessary as determined by their personal insurance agent. Management may request proof of insurance.

7. Employees must report any theft or malicious damage involving a Company vehicle, regardless of the extent of the damage. Such reports must be made as soon as possible, but no later than 48 hours after the incident. However, employees should make no voluntary statement other than in reply to questions of investigating officers.
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511 Company Credit Card Policy

ISTC offers company credit cards for employees who travel frequently as part of their duties, purchase large volumes of goods for use by the company or incur frequent business expenses that are paid by credit card.

As a rule, corporate credit cards cannot be used to obtain cash advances, bank checks, and electronic cash transfers or for anything other than the expenses incurred by the employee whose name appears on the credit card. The card is not to be used for personal expenses of the employee.

- Misuse of a company credit card will result in the cancellation of the card and may include termination. If the card is used for personal expenses, ISTC has the right to recover these expenses from the cardholder. ISTC may recover any charges incurred for personal reasons through payroll deduction.
 - Credit card expenditures must be submitted with receipts to CFO within 5 days of the statement date. Cardholders who do not submit their expenditures within this time frame will be asked to submit them immediately.
 - If a credit card holder does not follow this policy, his or her card will be cancelled.
 - Lost or stolen company credit cards must be reported to CFO immediately.
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512 Workers' Compensation Policy

ISTC currently provides workers' compensation, a type of accident and injury insurance that compensates an employee for lost wages, medical expenses and permanent impairment that results from an injury arising out of or in the course of work. Employees must report any work-related injury or disease immediately (or as soon as practicable) to their supervisor and Human Resources so that the necessary paperwork can be completed in a timely manner. Please note that under state laws, employees who fail to report work-related injuries in a timely manner may see a reduction or denial of their workers' compensation benefits.

If an employee is able to return to work after an injury or illness for which he or she was receiving workers' compensation, the employee must provide documentation from his or her medical provider that either outlines any work-related restrictions or verifies that the employee is able to complete all job-related tasks. In the event that an employee is able to return to work under restrictions, the company will make every reasonable effort to accommodate the employee's work ability and job responsibilities. If and when the medical provider removes all work restrictions, the employee is expected to perform his or her regular duties and will no longer receive workers' compensation benefits.

FMLA leave and workers' compensation leave may be taken concurrently.

513 Emergency Closing

ISTC will notify employees concerning emergency closings as soon as practicable. During an emergency closing, assigned employees may be asked to work to assist with miscellaneous functions and duties to ensure business continuity.

600 Tobacco Usage Policy

In keeping with ISTC's intent to provide a safe and healthful work environment, tobacco usage within ISTC buildings is prohibited. Tobacco use is only permitted in designated areas.

This prohibition includes the use of vapor products and e-cigarettes.

This policy applies equally to all employees, customers, and visitors.

601 Drug and Alcohol Policy

It is ISTC's goal to provide a drug-free, healthful, and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition that will not impair their ability to successfully perform their job or create a risk to the safety of themselves or others.

The unauthorized use, manufacturing, distribution, possession, selling or otherwise dispensing of alcohol/alcoholic beverages, prescription drugs (when not taken as prescribed by your doctor), any illegal drug/controlled substance, or illegal inhalants while at work, on the premises, including ISTC's vehicles, as well as off the premises performing work for ISTC is prohibited.

If you are undergoing medical treatment and are prescribed prescription drugs with side effects, which may impair your ability to perform your job, or your doctor advises you should not work due to potential side effects, you must provide Human Resources with a written excuse signed by the prescribing doctor describing why you cannot work.

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

Questions regarding this policy or issues related to drug or alcohol use in the workplace should be directed to the Human Resources Department. Employees may raise their concerns without fear of reprisal.

Alcohol may be permitted on ISTC premises or ISTC supported functions with the approval of the President/CEO.

602 Substance Abuse Prevention

Being under the influence of a drug or alcohol while on the job may pose serious safety and health risks for both the individual and those around them. ISTC recognizes that its own health and future are dependent upon the physical and psychological health of their employees. Accordingly, it is the right, obligation, and intent of ISTC to maintain a safe, healthful, and efficient working environment for all of its employees, and to protect ISTC's property, customers, vendors, equipment and operations.

ISTC has adopted a testing program to determine whether you are violating ISTC's Drug and Alcohol Policy that will be applied as follows:

1. You may be required to submit to a drugs/alcohol test under the following circumstances:

PRE-EMPLOYMENT TESTING: After being offered employment, but prior to being hired and beginning work, final candidates for employment will be asked to submit to a drug test.

RANDOM TESTING: Employees may be selected at random for drug testing at any interval determined by ISTC.

FOR CAUSE TESTING: ISTC may ask an employee to submit to an alcohol or drug test at any time the employee admits to contemporaneous drug use or demonstrates signs of possible drug or alcohol use or abuse, including, but not limited to: evidence of drugs or alcohol on or about the employee's person or in the employee's vicinity, unusual conduct by the employee that suggests impairment or influence of drugs or alcohol, negative performance patterns, excessive and unexplained absenteeism or tardiness, and reports of reliable third parties.

POST-ACCIDENT TESTING: Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol may be asked to submit to a drug and/or alcohol test. "Any employee involved" refers not only to the employee who was injured, but also any employee who potentially contributed to the accident or injury event, even if that employee is not injured.

2. If the test is confirmed positive, you will be subject to disciplinary action, up to and including termination.

3. ISTC will take into consideration any written documentation you provide from a medical provider that the test was positive due to a legal prescription from that medical provider but may also disregard such information.

4. Any drugs/alcohol testing conducted under this policy shall be performed at a medical facility/laboratory designated by ISTC. For purposes of administering this policy, ISTC will not accept test results from any facility other than the one designated by ISTC.

5. If you refuse to (a) submit to a drugs/alcohol test or (b) to submit to a drugs/alcohol test at ISTC- designated facility, your refusal will be considered a voluntary termination.
6. If your test results indicate a blood alcohol concentration, which equals or exceeds .08 percent, i.e., .08 gram of alcohol, you shall be conclusively presumed to have been under the influence of alcohol at the time the sample was taken. The existence of this standard shall not preclude ISTC from determining that an employee with a lower or undetermined blood alcohol concentration is under the influence of alcohol, nor shall it limit ISTC's right to discipline or terminate an employee for using or possessing alcohol, regardless of the amount.
7. If your urinalysis results are positive for the presence of any drug or its metabolites, you shall be conclusively presumed to have been under the influence of such drug at the time the sample was taken. The term "positive" means that a measurable amount of a prohibited substance or its metabolites was present in the sample.

Exceptions may be made for the use of prescription drugs if an employee presents a written statement from his/her prescribing physician licensed under the laws of the State of Texas which states the controlled substance is being taken under his/her orders and certifies use of the substance will not result in endangering the employee or other employees if used while at work.

Employees are encouraged to voluntarily seek assistance for substance abuse from outside providers that specialize in these areas.

603 Safety

Every employee is responsible for compliance with environmental, health and safety laws, and regulations. Rules alone will not prevent accidents; it takes the cooperation of all of us to prevent accidents and the conditions that cause them. ISTC is committed to providing a safe and healthful workplace for employees, customers, and visitors. Always THINK SAFETY. All employees should observe workplace safety rules and ensure that they use care when performing their duties. Do not assume that co-workers, visitors, vendors, or customers fully appreciate a risk you may see or that your immediate Supervisor is already aware of the situation.

Eliminate all risks, which are not part of your job function. Guard against injury to others and yourself. You should promptly report any conditions or practices that appear unsafe to your immediate Supervisor, including conditions that have not been addressed. If your immediate Supervisor is not available, report the safety concern to another person in management who has oversight responsibilities for the area and then, follow up your report with your immediate Supervisor as soon as you can. If a Supervisor is not available, immediately report any safety concerns to Human Resources. You are expected to cooperate with ISTC or its designated representative in any safety or accident investigation. Always verify that a person who claims to be investigating an accident has actually been authorized to do so by contacting Human Resources.

604 Workplace Violence

'Workplace violence" for purposes of this policy includes: (1) present threats of personal harm to another individual; (2) physically aggressive, or violent behavior; (3) behavior intended to incite disorder or rioting; (4) insubordinate or belligerent conduct, excessive arguing, or swearing; (5) destruction; (6) defacing or causing physical damage to or threatening destruction of ISTC property or property of a customer or employee; or (7) possessing weapons or firearms of any kind in violation of the No Weapons policy, unless the President/CEO has authorized in the employee to carry a concealed weapon.

If you observe or become aware of any of the above-listed actions or behavior by an employee or anyone else on the premises, or by an employee who is working off-site or in ISTC vehicles, you should immediately notify your immediate Supervisor or law enforcement. If imminent danger is present, immediately contact the local police or sheriff's department first. If you are threatened by someone who is trying to start an argument, contact the local police immediately.

You are requested to report any court order or restraining order, which may impact your work situation, or any other circumstances involving a non-work-related situation, which may potentially lead to workplace violence. Make this report to your immediate Supervisor and/or Human Resources. To the extent possible, ISTC will maintain the confidentiality of the information, but may consult with law enforcement authorities in appropriate circumstances, for example, when necessary to protect individual safety and share the information with those who have a need to know.

All reports of workplace violence should be taken seriously and will be investigated promptly and thoroughly. To the extent possible, ISTC will maintain the confidentiality of the reporting employee and of the investigation but may need to disclose the results of the investigation in appropriate circumstances, for example, when necessary to protect individual safety. ISTC will not tolerate retaliation against any employee who reports workplace violence. False reports will be the subject of discipline.

If ISTC determines that an employee has engaged in workplace violence, ISTC will take appropriate corrective action and will impose discipline on the offending employee(s), up to and including termination. ISTC may also seek the help of local law enforcement to restrain or remove employees and others.

605 On-the-Job Injury or Illness

ISTC is concerned about your safety and all work-related injuries. ISTC has elected to obtain workers' compensation insurance coverage for its employees. As an employee of a covered employer, you are eligible to receive workers' compensation benefits under the Texas Workers' Compensation Act. The information that follows is provided for informational purposes only. If you have questions, contact Human Resources.

Since we are a drug-free workplace, you will be subject to a post-accident drug and alcohol screen. If you test positive for the presence of substances defined as illegal pursuant to the Controlled Substances Act [21 U.S.C. 801 et seq.] Act or Texas law, you may not be eligible for benefits. See the Substance Abuse Prevention policy in this Handbook.

YOU MUST PROMPTLY REPORT ANY WORK-RELATED ACCIDENT OR INJURY OR ANY WORK-RELATED ILLNESS, INCLUDING ANY SUSPECTED OCCUPATIONAL DISEASE, TO YOUR SUPERVISOR PROMPTLY MEANS NO LATER THAN THE END OF THE DAY IN WHICH THE ACCIDENT OR INJURY OCCURRED OR THE ILLNESS BECAME KNOWN, REGARDLESS OF HOW MINOR IT MAY APPEAR TO BE AT THE TIME. Even minor wounds should be reported and treated promptly to prevent infection and speed the healing process. You should immediately report any accident or injury involving you or a co-worker to your immediate Supervisor. It is the responsibility of the Supervisor and employee to report the incident to Human Resources. Your failure to report accidents and/or injuries promptly is excused only in the case of an emergency.

You must promptly provide medical certification that your time off work is medically necessary and you are considered totally disabled. It is the employee's responsibility to be certain that Insurance Claims receives the medical certification from an approved provider. Failure to provide the medical certification may result in your being considered absent without good cause and in violation of ISTC's attendance policy. If you miss appointments for follow-up care or physical therapy prescribed by the treating physician, you may be subject to the loss of your benefits.

A release must be obtained from the treating provider before you will be allowed to return to work. The release must be submitted to Human Resources. Incomplete forms are not acceptable. All documents and bills that relate to your work-related injury or illness must be submitted to Human Resources or to an entity he/she indicates.

If you are off work for a work-related injury or illness, you will be placed on Family Medical Leave (FML), if you are eligible. If you are not eligible for FML, you will be placed on Leave without Pay. If you qualify for FML, your accrued vacation and sick leave days, if any, will be applied to your absences so that you will be paid wages and your health insurance premiums, if any, are paid. When your accrued paid leave is exhausted, you may continue your health insurance coverage as long as you timely pay your portion of your premiums on each regular payday since that is when ISTC would have deducted premiums from your paycheck. (You will not accrue vacation and sick leave while on FML.) You may elect to discontinue your premiums. If you are eligible for FML, you

will be reinstated to the health insurance plan when you return to work. For more information on continuing or discontinuing your health insurance coverage, contact Human Resources.

If you do not return to work or you are terminated, your benefits may continue subject to the provisions of the Consolidated Omnibus Budget Reconciliation Act, also known as "COBRA".

ISTC will make every effort to return you to work when you can perform the essential functions of your job, with or without reasonable accommodation. Working with you and your treating physician, we will attempt to develop reasonable accommodation that will match the restrictions established by the treating doctor that will not cause undue hardship to ISTC.

If you return to work with restrictions, it is your responsibility to abide by those restrictions, or additional limitations set by your doctor and ISTC, and you will be monitored by your immediate Supervisor to ensure compliance.

Any employee who fails to return to work after being released by an approved physician will be considered to have resigned and will be terminated.

ISTC prohibits retaliation against persons who in good faith report workplace injuries or cases of suspected occupational disease. If you believe you have been subjected to retaliation for filing, testifying or participating in a claim involving a work-related injury, please contact Human Resources. Violation of this policy against retaliation may result in disciplinary action, up to and including termination.

ISTC takes the filing of employee injury claims very seriously, and any reported accident or injury will be investigated to ascertain the cause of the accident or the injury. The investigation is intended to determine whether ISTC's procedures need to be changed to prevent future accidents and whether the claim was made in bad faith. Persons involved in work-related accidents are subject to drug and alcohol testing. This procedure is not intended to dissuade any employee from making a good faith claim of an on-the-job accident or injury. Further, ISTC's workers' compensation insurer may also conduct a separate investigation of the injury claim.

ISTC prohibits fighting, horseplay or rough-housing on the job or on the premises. Violation of this policy may lead to disciplinary action, up to and including termination. Benefits may be denied for any injury arising out of participation in horseplay, scuffling, fighting, or similar inappropriate or unsafe behavior.

Employee medical and health information learned during the process of dealing with an employee who has a work-related injury or illness must at all times be maintained as strictly confidential and shared only on a need-to-know basis.

700 Employee Conduct

The following general principles apply to every employee and form the basic standards of conduct that have enabled ISTC to preserve its long tradition of integrity and credibility within the community and petrochemical industry.

- Always act with fairness, honesty, integrity and openness; respect the opinions of others and treat all with equality and dignity
 - Be productive and results-oriented. Strive for personal and process improvement
 - Help your fellow employees
 - Be accountable for your actions. Take responsibility
 - Be truthful in all your dealings
 - Do the right thing – especially when no one is watching
 - Earn trust in all things, every day
 - Be compassionate
 - Never use your position, title, or authority for personal gain
 - Show interest in your fellow employees' success and personal well-being
 - Be a good communicator; listen to your fellow employees and customers
 - Report all waste, fraud, abuse, and corruption
 - Adhere to all policies
 - Provide a positive and valued experience for those receiving services from ISTC
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701 Progressive Discipline

Industrial Safety Training Council subscribes to the concept of progressive discipline. The process is designed to provide a structured corrective action procedure that improves and prevents a recurrence of undesirable employee behavior and performance.

Outlined below are the steps of ISTC's progressive discipline procedure. ISTC reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. The level of disciplinary action may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling or training, the employee's work record, and the impact the conduct and performance issues have on the organization.

Procedure

Step 1: Counseling and verbal warning

Step 2: Written warning

Step 3: Suspension and/or a final written warning

Step 4: Recommendation for termination of employment

The recommendation to terminate employment must be approved by the employees' supervisor in consultation with Human Resources. Final approval will be required from the President/CEO or designee.

702 Problem Resolution

ISTC is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from ISTC supervisors and management.

ISTC strives to ensure fair and honest treatment of all employees. Supervisors, managers, and employees are expected to treat each other with mutual respect

If employees disagree with established rules of conduct, policies, or practices, they can express their concern through the problem resolution procedure. No employee will be penalized, formally or informally, for voicing a complaint with ISTC in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs when employees believe that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to make use of the following steps. The employee may discontinue this procedure at any step.

1. Employee discusses problem to immediate supervisor as soon as possible, after incident occurs. If supervisor is unavailable or employee believes it would be inappropriate to contact that person, employee may present problem to any other member of management.
 2. Supervisor responds to problem during discussion or within five calendar days, supervisor may discuss with appropriate management, when necessary. Supervisor documents discussion.
 3. If problem is unresolved, employee presents problem to Human Resources as soon as possible.
 4. Human Resources counsels and advises employee, assists in putting problem in writing, visits with employee's manager(s), if necessary Human Resources will take to the President/CEO for review of problem.
 5. President/CEO reviews and considers problem. The President/CEO has full authority to make any adjustment deemed appropriate to resolve the problem.
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Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and management develop confidence in each other. Confidence is important to the operation of an efficient and harmonious work environment.



Industrial Safety Training Council
Employee Handbook

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