

# **Creative Circle**

## ***FREELANCE EMPLOYEE HANDBOOK***

**September 2024**

## **WELCOME**

Working with Creative Circle, LLC (“us”, “we”, or the “Company”), you are part of an elite group of creative and marketing professionals. As a member of our talented network, you can look forward to rewarding assignments with top companies.

We prepared this Handbook, including any applicable state supplement, to assist you in finding answers to many of the most frequently asked questions regarding personnel policies, compensation, and benefits. Of course, feel free to ask your Recruiter or Human Resources any questions regarding your employment. Human Resources can be reached at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com).

The contents of this Handbook are guidelines only and supersede any prior Handbook. The Company has the right, with or without notice, in an individual case or generally, to change and/or modify its interpretation of any of its guidelines, policies, practices, working conditions, or benefits at any time, unless otherwise restricted by applicable law. Nothing in this Handbook should be construed as a promise of specific treatment in any specific situation upon which any employee should rely. Additionally, many matters covered by this Handbook are also described in separate official documents, and such official documents are always controlling over any statement made in this Handbook or by any client supervisor or any employee.

**NEITHER THIS HANDBOOK NOR ANY OTHER COMPANY GUIDELINES, POLICIES, OR PRACTICES CREATES AN EMPLOYMENT CONTRACT, BARGAIN, OR AGREEMENT OR CONFERS ANY CONTRACTUAL RIGHTS WHATSOEVER. UNLESS OTHERWISE PROVIDED BY APPLICABLE LAW, EMPLOYMENT WITH THE COMPANY IS AT-WILL, AND EITHER THE EMPLOYEE OR THE COMPANY MAY TERMINATE EMPLOYMENT AT ANY TIME, WITH OR WITHOUT CAUSE, REASON OR NOTICE. NO REPRESENTATIVE OF THE COMPANY IS AUTHORIZED TO PROVIDE ANY EMPLOYEE, INDIVIDUALLY OR ON A COLLECTIVE BASIS, WITH AN EMPLOYMENT CONTRACT OR SPECIAL ARRANGEMENT CONCERNING THE TERMS OR CONDITIONS OF EMPLOYMENT UNLESS THE CONTRACT OR AGREEMENT IS IN WRITING AND SIGNED BY THE COMPANY’S PRESIDENT, BOARD OF DIRECTORS, OR CHIEF EXECUTIVE OFFICER.**

This notice applies to all employees regardless of date of hire.

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## **I. DIVERSITY & INCLUSION**

### **A. EQUAL EMPLOYMENT OPPORTUNITY**

The Company is an equal opportunity employer. We do not discriminate on the basis of actual or perceived race, color, religion, creed, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), age, sexual orientation, gender identity or gender expression (including transgender status), national origin, ancestry, citizenship status, genetic information, registered domestic partner status, marital status, disability, status as a crime victim, military service and protected veteran status, political affiliation, union membership, protected medical condition as defined by applicable state or local law, or any other characteristic protected by applicable federal, state, or local laws and ordinances.

Our management team is dedicated to ensuring the fulfillment of this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs, and general treatment during employment.

Employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of Human Resources. Reports of discrimination should be made in accordance with the Reporting Procedures set forth in the Discrimination, Harassment & Retaliation Prevention policy as well as any procedures set forth in any applicable state supplement. We will not allow any form of retaliation against employees who raise issues of equal employment opportunities in the workplace.

### **B. REASONABLE ACCOMMODATIONS & INTERACTIVE DIALOGUE POLICY**

The Company is committed to complying with applicable federal, state and local laws governing reasonable accommodations of individuals, including but not limited to the Americans with Disabilities Act (“ADA”). To that end, we will endeavor to make a reasonable accommodation to applicants and employees who have requested an accommodation or for who the Company has notice may require such an accommodation, without regard to any protected classifications, related to an individual’s: (i) disability, meaning any physical, medical, mental, or psychological impairment, or a history or record of such impairment; (ii) sincerely held religious beliefs and practices; (iii) needs as a victim of domestic violence, sex offenses or stalking; (iv) needs related to pregnancy, childbirth or related medical conditions; and/or (v) any other reason required by applicable law, unless the accommodation would impose an undue hardship on the operation of our business.

Any individual who would like to request an accommodation based on any reason set forth above should contact Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com). Accommodation requests can be made in writing using a form which can be obtained from Human Resources. If an individual who has requested an accommodation has not

received an initial response within five (5) business days, the individual should contact the Senior Vice President, Human Resources.

After receiving a request for an accommodation or learning indirectly that an individual may require such an accommodation, the Company will engage in an interactive dialogue with the individual. Even if an individual has not formally requested an accommodation, the Company may initiate an interactive dialogue under certain circumstances, such as when the Company has knowledge that an individual's performance at work has been negatively affected and a reasonable basis to believe that the issue is related to any of the protected classifications set forth above, in compliance with applicable law. In the event the Company initiates an interactive dialogue with an individual, it should not be construed as the Company's belief an individual requires an accommodation but will serve as an invitation for the individual to share with the Company any information the individual desires to share, or to request an accommodation.

The interactive dialogue may take place in person, by telephone, or by electronic means. As part of the interactive dialogue, the Company will communicate openly and in good faith with the individual in a timely manner in order to determine whether and how the Company may be able to provide a reasonable accommodation. To the extent necessary and appropriate based on the request, the Company will attempt to explore the existence and feasibility of alternative accommodations, as well as alternate positions for individuals. The Company is not required to provide the specific accommodation sought by an individual, provided the alternatives are reasonable and either meet the specific needs of the individual or specifically address the individual's limitations. As part of the interactive dialogue, the Company reserves the right to request supporting documentation, to the maximum extent permitted by applicable law.

The Company will endeavor to keep confidential all communications regarding requests for reasonable accommodations and all circumstances surrounding an individual's underlying reason for needing an accommodation. However, typically, any accommodation analysis would inherently need to include discussions with the client with which the employee is on assignment. We will ask for your written permission allowing Creative Circle to share with the client your healthcare information related to the employee's accommodation request, including information in their completed accommodation request form.

We will not allow any form of retaliation against individuals who have requested an accommodation, for whom the Company has notice may require such an accommodation, or who otherwise engage in the interactive dialogue process.

Individuals with questions regarding this policy should contact Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com).

### **C. LACTATION ACCOMMODATION**

The Company will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's child, to the extent required by and in accordance with applicable law. If possible and permitted by applicable law, the break time must run concurrently with rest and meal periods already provided to the employee. Break time that cannot run concurrently with rest and meal periods already provided to the employee will be unpaid, to the extent permitted by applicable law.

The Company will make reasonable efforts to provide an employee with use of a room or location in close proximity to the employee's work area, other than a bathroom, for the employee to express milk in private. This room or location may be the employee's private office, if applicable.

Employees will not be discriminated against or retaliated against for exercising their rights under this policy. Employees can contact Human Resources with questions regarding this policy at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com).

### **D. PAY TRANSPARENCY NONDISCRIMINATION PROVISION**

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Company, or (c) consistent with the Company's legal duty to furnish information.

### **E. DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION**

The Company does not tolerate and prohibits discrimination or harassment of or against our employees, job applicants, contractors, freelancers, interns, or volunteers by another employee, supervisor, vendor, customer, or any third party on the basis of actual or perceived race, color, religion, creed, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), age, sexual orientation, gender identity or gender expression (including transgender status), national origin, ancestry, citizenship status, genetic information, registered domestic partner status, marital status, disability, status as a crime victim, military service and protected veteran status, political affiliation, union membership, protected medical condition as defined by applicable state or local law, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as "protected characteristics"). The Company also prohibits retaliation as defined below.

The Company is committed to a workplace free of discrimination, harassment, and retaliation. These behaviors are unacceptable in the workplace and in any work-related

settings such as business trips and Company sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition to being a violation of this policy, discrimination, harassment, or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws and ordinances are unlawful.

**Discrimination Defined.** Discrimination under this policy generally means treating differently or denying or granting a benefit to an individual because of the individual's actual or perceived protected characteristic.

**Harassment Defined.** Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual based on or because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures, or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

**Sexual Harassment Defined.** Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, and other verbal, visual or physical conduct of a sexual nature when:

- Submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of conduct that violates this policy include:

- unwelcome flirtations, leering, whistling, touching, pinching, assault, brushing up against someone's body, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment

- obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies
- propositions, or suggestive or insulting comments of a sexual nature
- derogatory cartoons, posters, and drawings
- sexually explicit e-mails or voicemails
- uninvited touching of a sexual nature
- unwelcome sexually related comments
- comments, inquiries, or gossip about one's own or someone else's sex life or sexual activities
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender

**Retaliation Defined.** Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to: any action that would discourage or keep an individual from reporting discrimination, harassment or retaliation; shunning and avoiding an individual who reports discrimination, harassment or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting discrimination, harassment or retaliation; and denying employment benefits because an applicant or employee reported discrimination, harassment or retaliation or participated in the reporting and investigation of discrimination, harassment or retaliation.

**Reporting Procedures.** The following steps have been put into place to ensure the work environment at the Company is respectful, professional, and free of discrimination, harassment and retaliation. If an employee believes someone has violated this policy or our Equal Employment Opportunity Policy, the employee should promptly bring the matter to the immediate attention of Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) or telephone 323.930.2333. Any employee who is not comfortable reporting to Human Resources should contact any higher-level manager in their reporting chain. Written complaints can be submitted internally using the form provided with this policy. If the employee makes a complaint under this policy and has not received an initial response within five (5) business days, the employee should immediately contact Catherine Dixon at [kdixon@creativecircle.com](mailto:kdixon@creativecircle.com).

Every supervisor who learns of any employee's concern about conduct in violation of this policy or our Equal Employment Opportunity Policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy or our Equal Employment Opportunity Policy must immediately report the issues raised or conduct to Human Resources.

**Investigation Procedures.** Upon receiving a complaint, the Company will promptly conduct a fair and thorough investigation into the facts and circumstances of any claim of

a violation of this policy or our Equal Employment Opportunity policy to ensure due process for all parties. To the extent possible, the Company will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances. Employees are required to cooperate in all investigations conducted pursuant to this policy.

During the investigation, the Company generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Upon completion of the investigation, the Company will determine whether this policy or our Equal Employment Opportunity policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will inform the complainant and the accused of the results of the investigation.

The Company will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy or our Equal Employment Opportunity policy will be subject to discipline, up to and including termination. This includes individuals engaging in discrimination, harassment or retaliation, as well as supervisors who fail to report violations of this policy, or knowingly allow prohibited conduct to continue. Individuals who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

\* \* \* \*

Remember, we cannot remedy claimed discrimination, harassment, or retaliation unless you bring these claims to the attention of management. Please report any conduct which you believe violates this policy or our Equal Employment Opportunity policy.

## **II. WORKING AT THE COMPANY**

### **A. EMPLOYMENT CLASSIFICATIONS**

All employees are classified as temporary employees. A temporary employee may be hired for a specific purpose or time period and may work a full-time or part-time schedule.

All employees are also categorized as non-exempt. Pursuant to federal and state wage & hour laws, non-exempt employees receive overtime pay.

### **B. EMPLOYEE ELIGIBILITY AND WORK AUTHORIZATION**

The Company is committed to employing only individuals who are authorized to work in the United States and who comply with applicable immigration and employment law. As a condition of employment, individuals will be required to provide satisfactory evidence of their identity and legal authority to work in the United States by completing a Form I-9 form before they can be placed with a client. The Company uses the E-Verify system established by the Department of Homeland Security to verify employment eligibility.

### **C. BACKGROUND CHECKS**

Hiring someone to join our client's team is an important decision. To help ensure the security of our employees, customers, and property, the Company may be contractually obligated to and reserves the right to conduct background checks on all applicants and on current employees for certain designated positions and under certain circumstances. When conducting background checks and making employment-related decisions on the basis of information obtained during a background check, the Company will comply with applicable federal, state and local laws.

While a verbal offer may initiate the background check process, all final official offers of employment are made in writing and are contingent upon the successful completion of the background check. In addition, employees who work on projects that require access to classified or sensitive information (e.g., Department of Defense or Homeland Security) may be subject to a Government security investigation and additional eligibility requirements.

### **D. PERFORMANCE EVALUATIONS**

The primary reason for performance evaluations is to ensure that employees' perception of their work performance is consistent with how they are perceived by their Recruiter, the client, and the Company in general. It is equally important to identify strengths and weaknesses, identify areas that need development, discuss any performance-related issues and evaluate how employees work performance compares to their job description and position objectives.

## **E. PERSONNEL FILES**

Personal information such as an employee's address and telephone number is contained in a confidential personnel file maintained for each employee. Employees will be provided with access to and copies of personnel files to the extent required and in accordance with applicable state law. Questions regarding access/copies should be directed to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com).

To better assist employees and/or their families in the event of personal emergencies, the Company needs to maintain up-to-date contact information. Maintaining accurate information in our files also is important for recordkeeping, payroll, and benefits related purposes. Changes in name, address, telephone number, marital status, number of dependents, emergency contact information or changes in next of kin and/or beneficiaries should be given to Payroll promptly.

Unreported changes can affect withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach an employee in a crisis may be extremely problematic.

## **F. OPEN DOOR POLICY**

Employees may have suggestions for improving our workplace, as well as complaints about the workplace, and should feel free to contact their Recruiter or Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) with any suggestions and/or complaints. The most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with the Recruiter or the client supervisor.

## **G. LEAVING THE COMPANY**

### ***Separation from Employment***

Employees may leave the Company for a variety of reasons. Regardless of the reason, we strive to ensure that all separations from employment are handled fairly, efficiently, and in compliance with applicable federal and state laws.

When 31 days have passed since an employee's last Creative Circle paycheck was processed and they have not been placed on another assignment, their employment with Creative Circle will terminate, unless they are on an approved leave of absence.

### ***Involuntary Termination***

An involuntary termination occurs when the Company decides to end the working relationship with an employee. Involuntary terminations may occur for cause or for reasons other than cause.

### ***Pay and Benefits Upon Termination***

Final wages will be paid in accordance with applicable law. In accordance with Company policy, sick leave will not be paid upon termination unless otherwise required by law.

***Company Property***

Employees are required to return all Company and client property (e.g., computers, keys, ID badges, credit cards) that is in their possession or control upon separation of employment, or immediately upon request. Any damage to the property caused by employee's negligence, gross negligence, or misuse is the sole responsibility of employee. When allowed by law, and in accordance with applicable law, the Company may withhold from the employee's check or final paycheck the cost of any items that are damaged or not returned when required. No information belonging to the Company can be copied for the employee's use. We may also take all actions deemed appropriate to recover or protect Company or client property.

***Rehire***

Eligibility for rehire is determined in the Company's sole discretion to the maximum extent allowed by law.

### **III. SAFETY, HEALTH & SECURITY**

#### **A. DRUG FREE WORKPLACE POLICY**

The Company has a vital interest in insuring safe, healthful and efficient working conditions for our employees. In addition, we have a duty to safely and efficiently provide the public with quality services at a reasonable cost. The unlawful presence of controlled substances in the workplace conflicts with these vital interests and constitutes a violation of the public trust. For these reasons, we have established, as a condition of employment and continued employment, the following drug-free workplace policy.

The Company strictly prohibits the unlawful or unauthorized use, abuse, manufacture, solicitation, theft, possession, transfer, purchase, sale, dispensation, or distribution of controlled substances, drug paraphernalia, or alcohol by an individual anywhere on Company or client premises, while on Company business (including when working from home), while driving a Company vehicle or driving a personal vehicle for Company business, or while representing the Company. An exception may be made for company or client sponsored events where alcoholic beverages are provided. On those occasions, we expect that employees be responsible for themselves by consuming no more than a moderate amount of alcohol.

Employees also are prohibited from reporting to work or working while they are using or under the influence of alcohol, any drugs as well as any controlled substances which may impact an employee's ability to perform the employee's job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee to report to work. However, to the extent permitted by and in accordance with applicable law, this exception does not extend any right to report to work under the influence of medical marijuana or to treat the lawful use of medical marijuana as a defense to a policy violation or a positive drug test, to the extent employee is subject to any drug testing requirement.

Violation of this policy may result in disciplinary action, up to and including termination.

The Company maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist employees recovering from substance and alcohol dependencies, and those who have a medical history that reflects treatment for substance abuse conditions. Additionally, in the discretion of the Company, any employee who violates this policy may be required, in connection with or in lieu of disciplinary sanctions, to participate to the Company's satisfaction in an approved drug assistance or rehabilitation program. However, employees may not request an accommodation to avoid discipline for a policy violation.

As a supplement to this policy, the Company makes assistance available to any employee experiencing problems resulting from drug or alcohol abuse or dependency. Such employees are encouraged to directly contact the SupportLinc Employee Assistance Program (EAP) at 888.881.5462 to access confidential counseling and support services,

or to seek guidance from the appropriate Human Resources representative at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com). The aim of having information available to employees who voluntarily seek assistance is to help – rather than discipline – the employee.

## **B. SMOKE FREE WORKPLACE**

Creative Circle and client sites allow smoking in designated areas only. The client supervisor will inform employees of the designated smoking areas at your worksite. In areas where smoking is not allowed (including in all areas of our facilities), smoking and the use of all tobacco-related products, including but not limited to the use of chewing tobacco, e-cigarettes, vaping devices and similar electronic devices, is prohibited at all times. Employees who violate this policy may be subject to disciplinary action, up to and including termination. Any disputes involving smoking and any employees with questions should discuss their issues/concerns with Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com). Employees will not be subject to retaliation for reporting violations of this policy in good faith.

## **C. DRIVING FOR COMPANY BUSINESS**

Unless expressly given permission in writing to do so by Creative Circle, employees are not permitted to drive for company business. If it is necessary to do so, employees are expected to comply with all local, state, and federal laws while driving a personal vehicle for business purposes. The Company may discipline employees who engage in unlawful conduct. For example, employees who are assigned to drive as part of their job duties are required to have and maintain a valid driver's license, wear seat belts, travel at a safe speed, and maintain legally mandated insurance. The improper, careless, negligent, destructive, or unsafe use or operation of vehicles, as well as excessive or avoidable traffic and parking violations, can result in disciplinary action, up to and including termination of employment.

Employees are prohibited from using cell phones or other handheld electronic devices while driving, except that making or receiving calls using a hands-free device is permitted where such calls are urgent and it is not possible to safely pull off the road.

Any accidents while driving on company business, regardless of severity, must be reported immediately to the police and to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com). Failing to stop after an accident and/or failure to report an accident may result in disciplinary action up to and including termination of employment.

The Company will reimburse employees who drive on company designated business for business use of personal vehicles in accordance with the Expense Reporting & Reimbursement Policy section of the Handbook.

#### **D. CELL PHONE USE/TEXTING WHILE DRIVING**

Employees who are authorized to drive as part of their job responsibilities are expected to put safety first. Therefore, employees shall not use cell phones or any other type of electronic device to communicate while driving, unless the employee's use is completely "hands-free," including dialing, and such use is permitted by state and local law.

Employees also may not send or review text messages while driving as part of their job responsibilities. The purpose of this policy is to ensure the safety of employees, other motorists, and company property. Employees who are charged with traffic violations, or cause accidents or injuries, resulting from their use of any electronic communication device while driving, will be solely responsible for all liabilities, fines, etc., that result, to the extent permissible under the law.

Employees whose job responsibilities do not specifically include driving as an essential function are also expected to abide by the provisions of this policy.

#### **E. WORKPLACE VIOLENCE**

We are strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and visitors and damage to Company and personal property.

Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee will not be tolerated. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious, and/or destructive action undertaken for the purpose of domination or intimidation.

Weapons are prohibited on Company and client premises and in Company vehicles unless such prohibition is restricted by applicable law.

Employees should immediately report any potentially dangerous situations, including threats by co-workers, to any member of management with whom they feel comfortable. Reports may be maintained confidential to the extent maintaining confidentiality does not impede our ability to investigate and respond to the complaints. All reports will be promptly investigated. No employee will be subjected to retaliation, intimidation, or disciplinary action as a result of reporting in good faith under this policy.

If an investigation confirms that a violation of this policy has occurred, the Company will take swift and appropriate corrective action.

Employees threatened by an outside party should follow the steps detailed in this section. It is important for us to be aware of any potential danger on our premises. Indeed, we want to take effective measures to protect everyone from the threat of a violent act by an employee or by anyone else.

Questions about this policy should be directed to management.

## **F. PERSONNEL WITH SECURITY CLEARANCES**

In addition to all other applicable policies outlined in this handbook, all Company employees holding a Government-issued security clearance as a requisite to the performance of the employees' duties for the Company or client are expected to comply with the requirements of the National Industry Security Program Operating Manual (NISPOM) and all lawful instructions and requests from Company's Security Representatives.

## **G. EMERGENCY EVACUATION**

Employees should review this policy and the evacuation procedures for their particular office and/or client site and notify their client supervisor if they believe they might require an accommodation or assistance in order to comply with these procedures in the event of an emergency

In the event of a fire, the emergency fire alarm system should be activated by pulling one of the fire alarms. The source of a potential fire or hazardous material emergency should not be investigated. Any employee who suspects an emergency should report it immediately. In any emergency, reporting is the first essential step to protecting oneself and others.

When the emergency fire alarm system is activated, all employees and visitors are expected to evacuate the building by exiting in an orderly manner through the nearest exit.

When exiting during an emergency evacuation, employees should not use elevators and should descend stairwells in an orderly manner. After exiting, employees should report to the area away from the building exits designated as the meeting location. Once employees arrive at the designated area, they should immediately report to their supervisor and remain at that location until accounted for and authorized to leave.

No reentry to the building will be permitted until an official all-clear notification is given.

## **H. INSPECTIONS**

The Company reserves the right to require employees on either Company property or on a client's property to agree to the inspection of their person, personal possessions, property, a personal vehicle parked on Company or client property, and work areas, to the maximum extent permitted by applicable law. This includes lockers, vehicles, desks, cabinets, workstations, packages, handbags, briefcases, and other personal possessions or places of concealment, as well as personal mail sent to the Company or to its clients. Searches of Company or customer facilities and property, including Company or customer property in the possession of the employee, may be conducted at any time and

do not have to be based upon reason to believe Company policy is being violated. Employees are expected to cooperate in the conduct of any search or inspection. **Employees should have no expectation of privacy in any personal items brought into the workplace or in any Company or client work area or property used by the employee, whether or not locked with an employee or Company/customer lock.**

## **I. CAMERAS AND VIDEO SURVEILLANCE**

For purposes of workplace safety and security, and to prevent theft and other misconduct, the Company or its clients may install video surveillance cameras in work areas. Examples of locations that may utilize video surveillance include but are not limited to parking areas, building exits and entrances, stairwells, fitness center, break rooms, and kitchen areas.

If there is any reported incident of theft, trespass, workplace violence, employee misconduct, or any type of safety violation, the Company will utilize its surveillance equipment as an investigatory tool, and will ask the client, if applicable, for their equipment as well.

The Company respects the privacy of its employees. Accordingly, no video cameras will be installed in the Company's restrooms or in any changing areas.

The surveillance video cameras and any video footage from the surveillance are to be used solely for the purposes of this video surveillance policy. Any unauthorized use of these video cameras and/or videotapes is strictly forbidden and may result in discipline, up to and including termination of employment.

## **IV. ETHICAL EXPECTATIONS & RELATED POLICIES**

### **A. CODE OF ETHICS**

The Company adheres to the highest standards of business ethics in dealing with the Company's employees, clients, vendors, and the general public. The Company conducts its business affairs with honesty, integrity and in compliance with governmental rules and regulations.

This Code of Ethics ("Code") applies to the Company and its respective directors, officers and employees and provides a set of expectations to guide the Company's behavior. This Code focuses on areas of ethical risk, provides guidance to all employees to help them recognize and deal with ethical issues, presents mechanisms for reporting unethical conduct, and helps to foster a culture of honesty and accountability.

Violations of this Code may subject the violator to disciplinary action, including where appropriate, termination of employment.

The Legal Department will report significant violations to ASGN's Board of Directors and recommend appropriate action.

#### ***Employees, Directors and Officers***

All employees, directors and officers of the Company are expected to perform their duties in compliance with this Code and conduct themselves honestly and ethically at all times. Everyone is treated, and expected to treat others, with fairness, respect and dignity. The Company offers equal opportunities for employment to all individuals and does not tolerate intimidation, harassment or discrimination based on Protected Characteristics.

#### ***Compliance with Laws and Regulations***

All employees, directors and officers are expected to comply with all applicable laws, rules and regulations.

#### ***Confidential Information***

All employees, directors and officers must respect and maintain the confidentiality of confidential business information entrusted to them by the Company or its customers. Disclosure of confidential, non-public proprietary information or information regarding business partners, vendors, or customers is prohibited, unless disclosure is authorized, legally mandated, or otherwise legally protected. In addition, employees, directors and officers must adhere to the Company Confidential Information Policy.

#### ***Conflicts of Interest***

Employees, directors and officers may not compete with the Company or disadvantage the Company by taking corporate opportunities for personal gain or engaging in any action that creates actual or apparent conflicts of interest with the Company. Any employee involved in a conflict of interest or a transaction or relationship that reasonably could be expected to give rise to a conflict must report the matter promptly to their

supervisor and/or the Legal Department. Any officer or director in such situations must report it to the Legal Department.

### ***Corporate Opportunities***

Employees owe a duty to the Company to advance the Company's legitimate business interest when the opportunity to do so arises. Employees are prohibited from taking for themselves (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and refused it. Employees are prohibited from using Company property, information or position for personal gain or competing with the Company, directly or indirectly.

Please refer to the Conflicts of Interest Section under Employee Conduct for additional information.

### ***Gifts and Gratuities***

Exchanging gifts, entertainment and other reasonable favors is a common and often appropriate practice in business interactions. The Company does not, however, accept, offer or authorize exchanges that are not a reasonable part of a business relationship.

### ***Competitive Practices***

The Company competes vigorously, but fairly, in compliance with all applicable antitrust and competition laws. The Company's business interactions are designed to promote a competitive economy and fair and vigorous competition.

### ***Financial Integrity***

the Company is committed to recording all business transactions accurately and truthfully in accordance with generally accepted accounting principles. Appropriate internal controls are maintained to prevent or detect fraud and to ensure that accounting/financial records and supporting data describes transactions without omission, concealment or falsification.

### ***Protection of Assets***

All employees, officers and directors should protect the Company's assets and ensure their efficient use. The Company's assets should be used only for legitimate business purposes. Theft, carelessness and waste directly and adversely impact the Company's profitability.

### ***Public Disclosure***

All disclosure in reports and documents that ASGN or its subsidiaries ("ASGN") files with, or submits to, the Securities and Exchange Commission ("SEC") and in other public communications made by ASGN shall be full, fair, accurate, timely and understandable. All employees who are involved in ASGN's disclosure process are responsible for acting in furtherance of this policy. In particular, these individuals are required to maintain familiarity with the disclosure requirements applicable to ASGN and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material

facts about ASGN to others, within or outside ASGN, including ASGN's independent auditors. In addition, any employee who has a supervisory role in ASGN's disclosure process has an obligation to discharge their responsibilities diligently.

### ***Procedure for Reports Concerning Accounting and Auditing Matters***

Any person with a complaint regarding the Company's accounting, internal accounting controls or auditing matters, or a concern regarding questionable accounting or auditing matters may anonymously and/or confidentially report that complaint or concern directly to the Audit Committee by one of the following means:

- Call one of the toll-free anonymous hotlines:
  - English-speaking USA and Canada: 833-620-0070
  - Spanish-speaking USA and Canada: 800-216-1288
  - French-speaking Canada: 855-725-0002
  - All other countries: 800-603-2869 (must dial country access code first [click here](#) for access codes and dialing instructions)
- Send an email to [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- Provide a report anonymously at [www.lighthouse-services.com/asgn](http://www.lighthouse-services.com/asgn) or go to a direct URL for a specific language:
- Fax a report to (215) 689-3885 (must include company name with report)
- Write the Audit Committee of the Board of Directors:  
Chairperson of the Audit Committee of the Board of Directors  
c/o ASGN  
26745 Malibu Hills Rd.  
Calabasas, California 91301

### ***Conclusion***

The Company is committed to maintaining the highest ethical standard in all business-related endeavors and expects and requires an equal commitment from each of its employees, directors and officers.

## **B. ANTI-CORRUPTION REPORTING AND WHISTLEBLOWER POLICY**

### ***We Encourage a Speak Up Culture***

Choosing to speak up about workplace concerns helps build a healthy, ethical, and compliant company and is part of our culture. To promote that culture, the Company encourage employees to speak up and raise questions and concerns promptly about any situation that may violate our [Code of Business Conduct and Ethics](#), our policies, procedures, or any applicable law (collectively, the "Code"). Our people are our most valuable asset. It benefits all of us if we raise our concerns so the Company may consider them carefully and address them properly.

### ***Follow the Company's Commitment to the Code***

The Company is deeply committed to promoting a culture of ethical conduct and compliance with:

- Our Code of Business Conduct and Ethics and our policies;

- The laws, rules, and regulations that govern our business operations; and
- Best practices in accounting, auditing and financial reporting matters.

***The Company's Commitment Includes Zero Tolerance for Bribery or Corruption***

It is the Company's policy to conduct all of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

In addition to compliance with the Anti-Kickback Act (described in the Code), the Company complies with all applicable anti-corruption laws, including the Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act ("UKBA"), and the local laws in every country in which we do business. The FCPA and the UKBA prohibit giving anything of value to a "foreign official," for the purpose of influencing the decisions of those officials. In short, they prohibit bribery of foreign officials in any country. The UKBA also prohibits private sector (commercial) bribery.

"Foreign official" is defined broadly to include:

- Any officer or employee of any government entity, department or agency;
- Any employee of a government-owned school, hospital or other public entity;
- Any employee of state-owned or state-controlled commercial enterprises;
- Any political party, party official, or candidate for political office; and
- Any person acting in an official capacity on behalf of a government entity.

It is important to keep in mind that even persons who are not deemed to be "officials" under local laws may still be considered "foreign officials" under the FCPA and UKBA.

The FCPA also mandates that companies establish and maintain accurate books and records and sufficient internal controls. The Company's policy on record-keeping, and methods for reporting concerns about accounting or auditing matters, are fully described in the Code.

The Company is committed to avoiding acts which might reflect adversely upon the integrity and reputation of the Company. Accordingly, all of our employees, officers, directors, and agents must comply with this policy and follow this commitment in all aspects of their work.

It is the policy of the Company to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. It is the goal of the Company to avoid acts which might reflect adversely upon the integrity and reputation of the Company. The purpose of our Anti-Corruption, Reporting and Whistleblower Policy (the "Policy") is to ensure that all Company employees understand the general requirements of international laws relating to anti-bribery and anti-corruption, such as the U.S. Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act ("UKBA"). All employees of the Company, including officers and

directors, must comply with this Policy.

### ***Raise Good Faith Questions and Concerns about Conduct which may Violate our Code***

We promote an environment that fosters honest, good faith communications about matters of conduct related to our business activities, whether that conduct occurs within the Company or otherwise involves one of the Company's contractors, suppliers, consultants, or clients, or involves any other party with a business relationship with the Company. Consistent with our commitment to ethics, compliance, and the law, we welcome your good-faith questions and concerns about any conduct you believe may violate our Code, especially conduct that may be illegal, fraudulent, unethical, or retaliatory.

### ***What and Where to Report***

Examples of activity that should be immediately reported to the Company include, but are not limited to:

- Fraud;
- Bribery;
- Gratuity, gifts, favors, entertainment, loans, or anything of monetary value given to government employees;
- Association with outside companies in a manner that creates a conflict of interest in the performance of job functions;
- Violations of the FCPA or the UKBA;
- Failure to report a significant overpayment of any contract with the government or the presentation or creation of false claims for government payment;
- Any request for an improper payment (including facilitation payments);
- Any indication that a person might be making corrupt payments;
- Any information or knowledge of any hidden fund or asset;
- Any false or artificial entry in the Company's books and records;
- Any payment that circumvents the Company's internal financial processes; or
- Other violations of the Code.

Employees must report any of the potential violations described above using one of the methods described below:

- Contact their Division General Counsel or the ASGN Chief Legal Officer;
- Call one of the toll-free anonymous hotlines:
  - English-speaking USA and Canada: 833-620-0070
  - Spanish-speaking USA and Canada: 800-216-1288
  - French-speaking Canada: 855-725-0002
  - All other countries: 800-603-2869 (must dial country access code first);
- Send an email to [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report);
- Provide a report anonymously at [www.lighthouse-services.com/asgn](http://www.lighthouse-services.com/asgn) or go to a direct URL for a specific language;
- Fax a report to (215) 689-3885 (must include company name with report); or

- Write the Audit Committee of the Board of Directors:  
Chairperson of the Audit Committee of the Board of Directors  
c/o ASGN Incorporated  
4400 Cox Road, Suite 110  
Glen Allen, Virginia 23060

When raising concerns, we ask that employees provide as much detailed information as possible, including the background and history of the concern, names, dates, and places where possible, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that the Company may conduct an appropriate review and if necessary, begin an investigation.

Please note as well that the Company does not prohibit anyone from electing to report concerns to, file a charge or complaint with, make lawful disclosures to, provide documents or other information to, participate in an investigation or hearing conducted by or communicate with the Equal Employment Opportunity Commission (“EEOC”), National Labor Relations Board (“NLRB”), Securities and Exchange Commission (“SEC”) or any other federal, state or local agency charged with the enforcement of any laws.

Additionally, in raising any questions or concerns employees may have about potentially illegal conduct, pursuant to the 2016 Defend Trade Secrets Act (“DTSA”), no individual will be held criminally or civilly liable under Federal or State trade secret law for disclosure of a trade secret (as defined in the Economic Espionage Act) that is: (A) made in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney, and made solely for the purpose of reporting or investigating a suspected violation of law; or, (B) made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal so that it is not made public. And, an individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court or arbitration proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order or arbitration award.

### ***The Company Does Not Tolerate Retaliation***

Coming forward with questions or concerns may sometimes feel like a difficult decision, but we are committed to fostering an environment that does not deter individuals from speaking up when they observe conduct that may violate the Code. For that reason, the Company will not tolerate retaliation of any kind because an employee in good faith raises a question or concern about a violation or suspected violation of our Code, our policies, or the laws and regulations under which we do business, or because the employee participates in or cooperates with an investigation of such concerns.

Retaliation is any conduct that would reasonably dissuade an employee from raising, reporting or communicating about good faith concerns through our internal reporting channels or with any governmental authority, or from participating in or cooperating with an investigation or legal proceeding raising such concerns. Retaliation may occur through

conduct or written communication and may take many forms, including actual or implied threats, verbal or nonverbal behaviors, changes to the terms or conditions of employment, coercion, intimidation, or deliberate exclusionary behaviors.

The following are examples of potential retaliation the Company prohibits:

- Adverse employment action affecting an employee's salary or compensation;
- Demotion, suspension, or termination of employment;
- Taking away opportunities for advancement;
- Excluding an employee from important meetings;
- Threatening an employee who has made a report; and
- Directing an employee who has made a report not to report to outside regulators.

It is the Company's policy to adhere to all applicable laws protecting our employees against unlawful retaliation or discrimination as a result of their raising good faith questions or concerns. If any employee is ever aware of an instance or threat of retaliation, please immediately report it.<sup>1</sup>

### ***What the Company Will Do***

When an employee raises a concern, the Company will maintain confidentiality to the extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review. ASGN is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted. All action taken by the Company in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. The Company complies with the law in conducting investigations and expects that employees will cooperate with an investigation. The Company also expects that employees will provide truthful information when participating in an investigation and, during the investigation, will keep matters related to the investigation confidential.

Remember, all good faith concerns and reports raised under this policy will be taken seriously.

### ***Adherence to This Policy***

Employees who believe that they have witnessed, have knowledge of, or have been subjected to any conduct that violates this policy may register a complaint using the procedures outlined above. Any employee who unlawfully discriminates or retaliates against another employee as a result of the employee's protected actions as described in this policy may be subject to corrective action, up to and including termination.

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<sup>1</sup> Nothing in this policy prevents the Company from taking appropriate disciplinary or other legitimate employment action consistent with its usual disciplinary practices and the law. In addition, this policy prohibits and does not protect employees who knowingly and intentionally raise false concerns or reports.

## C. HUMAN RIGHTS POLICY

The Company is committed to respecting and supporting human rights and providing a working environment free from any form of harassment or discrimination. The basic principles of human rights align with our company values and commitment to the highest standards of business practices and performance in all that we do. We support and abide by internationally recognized human rights in accordance with the principles outlined in the [United Nation's Universal Declaration of Human Rights](#) and as expressed in the [International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#), in addition to complying with all local laws and regulations. Our commitment is demonstrated by becoming a signatory member of the United Nations Global Compact, and aligning with the [United Nations Guiding Principles on Business and Human Rights](#). The Company also expects its suppliers, business partners, and clients to uphold these principles and urges them to adopt similar policies within their own businesses.

We focus our human rights efforts on areas most relevant to our business and operations in terms of potential human rights impacts. To maintain the Company's reputation and ensure that we are not, directly or indirectly, in any way complicit in human rights abuses, we expect all of our internal stakeholders to understand and comply with the following principles:

**Maintain a Healthy and Safe Workplace.** The Company strives to provide all of our employees, consultants and vendors with a safe and healthy work environment. We do this by following all applicable safety and health laws and regulations, as well as internal requirements within our facilities. Immediately report any potential health or safety issues to your supervisor.

**Uphold a Culture of Dignity and Respect, and Diversity, Equity and Inclusion ("DEI").** We are committed to ensuring a respectful environment for all, treating everyone with dignity and respect at all times, and never engaging in illegal discriminatory conduct, abuse of authority, or harassment of any kind. The Company views **DEI** as inextricably linked to our mission and core values, which include:

- A steadfast commitment to constant learning, evolving and adapting;
- Being responsive, thoughtful, helpful and responsible to our colleagues, customers and stockholders;
- Taking ownership of our problems and challenges and focusing on being accountable;
- Creating solutions and actively engaging in continual improvement; and
- Empowering our employees and clients to succeed and achieve excellence.

**Provide a Sexual Harassment-Free Workplace.** The Company is committed to providing a working environment free of all illegal forms of harassment, including sexual harassment. The Company will not tolerate sexual harassment of or by any of its employees, consultants, applicants, clients or vendors and will treat any violation of this policy as a disciplinary matter. Sexual harassment is prohibited regardless of whether it involves individuals of different sexes or the same sex. This protection extends to our

employees assigned and working at a client location, and includes incidents occurring outside of the workplace during the course and scope of assigned job duties.

**Ensure Fair Employment Decisions.** We are committed to eliminating employment discrimination. The Company employees are entitled to fair treatment in respect to all aspects of their employment, including compensation and working conditions, consistent with local law. When making employment decisions, the Company does not tolerate discrimination against a person's legally protected characteristics, such as race, color, religion, gender identity, age, national origin, sexual orientation, marital status, disability status, or veteran status.

**Respect Freedom of Association.** The Company respects the right of all its employees to join or not to join a trade union of its own choosing, engage in peaceful assembly and bargain collectively in accordance with the law. Employees are free to engage in protected concerted activity and openly communicate and share ideas and concerns about terms and conditions of employment with management without fear of discrimination, reprisal, intimidation or harassment.

**Zero Tolerance for Corruption.** We comply with anticorruption laws, and always compete ethically for our business without paying bribes, kickbacks or giving anything of value to secure an advantage in connection with The Company's business. See our Anti-Corruption, Reporting and Whistleblower Policy.

**Demand Supply Chain Accountability.** The Company has zero tolerance for human rights abuses in our supply chain. We are committed to supporting and respecting human rights in our supply chain in a manner consistent with The Company's Supplier Code of Conduct.

**End Human Trafficking.** The Company does not tolerate or condone any form of trafficking in persons, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, the use of slave or forced labor (which means work performed involuntarily under threat of penalty), or unlawful child labor. The Company supports the policies adopted by the United States Government which prohibits trafficking in persons, as well as similar laws in other countries. Given the nature of our business, the Company does not have an extensive supply chain network. Our supply chains include, among others: office supplies including stationery; IT hardware and software; cleaning and catering services; advertising and print services; office build out and building maintenance services; and professional services such as those provided by our external financial auditors. Nevertheless, the Company is committed to acting ethically and with integrity in all its business dealings and relationships to prevent human trafficking, sexual exploitation, slavery, forced labor, or unlawful child labor anywhere our business operates globally.

The Company has taken a number of actions to prohibit the use of forced/involuntary labor or unlawful child labor. Employment is limited to those age 15 years or older, and a government-issued birth certificate or official passport is required to verify a worker's

age. The Company ensures all work is voluntary and does not use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor in this context includes transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

The Company will not withhold a workers' original government-issued ID or travel documents, and shall ensure that workers are clearly conveyed the conditions of employment in a language understood by the workers. The Company also will not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by workers, the fees shall be repaid to the worker.

We are all responsible for proactively reporting human trafficking to the appropriate authorities. Any employee who knows or suspects that human trafficking is occurring/has occurred in any parts of our business or supply chains of any supplier should promptly report it.

**Violation of the Human Rights Policy: Consequences and Reporting.** A violation of this policy could result in disciplinary action, up to and including termination. Any employee who is aware of a violation of this policy has an obligation to report it to the Company. As stated in the Company's [Code of Business Conduct and Ethics Policy \(the "Code"\)](#) The Company does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Code, or other Company policies. To report a possible violation of this policy, contact Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) or the Company's [anonymous hotline](#).

#### **D. EMPLOYMENT OF FAMILY MEMBERS**

The Company is not opposed to hiring relatives of current employees and will accept and consider their applications for employment. However, to avoid potential problems of safety, security, supervision, morale, favoritism, or conflicts of interest: the Company strictly prohibits the following:

- Managers/supervisors from having a family member in their line of supervision;
- Managers/supervisors from having a familial relationship with any employee over whom the manager/supervisor has authority to do any of the following with respect to the other employee: direct and control the activities and work assignments; review or approve performance reviews, wages, salary adjustments; administer disciplinary actions; and/or recommend or approve the hiring, firing or transfer.

For the purposes of this policy, a relative is any person who is related by blood or marriage or whose relationship with the employee is similar to that of persons who are related by blood or marriage (e.g., domestic partnership or civil union status), who is a roommate, or anyone else whose relationship to the employee could be perceived as causing a conflict of interest.

Where such a relationship exists, the Company reserves the right to make such employment decisions as are necessary to ensure that the risks enumerated above attendant to the relationship will not occur. Any such relationships must be disclosed to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) so immediate steps can be taken to resolve conflict with the policy. Failure to comply with the policy may result in disciplinary action, up to and including discharge.

## **E. DATING AND ROMANTIC RELATIONSHIPS**

The Company strictly prohibits the following:

- Managers/supervisors from dating or engaging in romantic or sexual relationships with employees who are in their line of supervision;
- Senior leadership and members of the Human Resources Department from dating or engaging in romantic or sexual relationships with any employee; and
- Managers/supervisors from dating or engaging in romantic or sexual relationships with any employee over whom the manager/supervisor has authority to do any of the following with respect to the other employee: direct and control the activities and work assignments; review or approve performance reviews, wages, salary adjustments; administer disciplinary actions; and/or recommend or approve the hiring, firing or transfer.

In situations other than those set forth above, the Company discourages, but does not prohibit, dating or engaging in romantic or sexual relationships between employees. Nonetheless, dating or engaging in romantic or sexual relationships between employees may still create conflict of interest, claims of sexual harassment, and/or otherwise impact the working environment.

The terms “dating” and “romantic or sexual relationship” as used in the policy include, but are not limited to:

- Casual dating;
- Serious dating;
- Cohabitation;
- Sexual relationship including casual sexual involvement where the parties have no intention of carrying on a long-term relationship; and/or
- Any other conduct or behavior normally associated with romantic or sexual relationships.

The restrictions set forth above apply regardless of the sex/gender, gender identity/expression and/or sexual orientation of the employees involved. The policy applies only to consensual dating, romantic or sexual relationships between employees. Unwanted sexual attention (including physical contact) with the purpose or effect of creating an offensive environment is strictly prohibited and a violation of the Company’s harassment policy.

Any dating, romantic or sexual relationships must be disclosed to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) within a reasonable time after the relationship

begins so steps can be taken to address potential problems or conflicts of interest that could arise. The involved parties shall promptly meet to discuss how to best minimize potential workplace distraction and disruption, and to protect against the potential for claims of sexual harassment. The Company may require the parties to acknowledge in writing the voluntariness of any such relationship. Such information will be treated by the Company as confidentially as possible consistent with the Company's business needs, however confidentiality cannot be guaranteed.

Where such a relationship exists, the Company reserves the right to make such employment decisions as are necessary to ensure that the risks enumerated above attendant to the relationship will not occur. Failure to comply with the policy may result in disciplinary action, up to and including discharge.

## **F. CONFIDENTIAL INFORMATION**

While working on assignment, employees may be entrusted with sensitive information of a confidential nature. Confidential information may include, but is not limited to, business models, strategies, marketing initiatives, marketing methods and related data, client pricing structure, customer lists, customer purchasing habits, computer processes, programs and codes, business proposals, future business plans, operations, company financial performance, contracts, personnel data, trade secrets, and revenues.

Each employee must use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such confidential information. In no event should employees disclose or reveal confidential information within or outside the Company or client without proper authorization. No one is permitted to remove, download, or make copies of any confidential client records, reports or documents without prior written approval from the client supervisor.

Employees are prohibited from disclosing confidential information to anyone, including family, friends or other employees who do not have a need to know as part of their job duties. In addition, any work product that is created by employee directly for the client, or as part of the project team employee is assigned to, is the sole property of the client. As such, copies, samples and other hard copy versions of said work product may not be removed from the client's premises without the client's permission. An employee must get the client's permission before any of their work product created for that client (including drafts that are not used) or information about the client, its products or services, or employee's work with them is posted or published to any outside source, including their professional portfolio or personal social media sites.

Nothing in this policy or any related agreement is intended to prohibit employees from discussing their wages or other terms and conditions of employment, engaging in other protected conduct under Section 7 of the National Labor Relations Act, reporting to, communicating with, contacting, responding to an inquiry from, or providing relevant information to or participating or assisting in an investigation conducted by the SEC or other governmental or regulatory body or official or self-regulatory organization.

Employees need not obtain the Company's prior authorization or otherwise notify the Company before making such reports or disclosures.

#### **G. CONTACT WITH THE MEDIA**

Employees should not speak to the media (including television, radio, newspaper, magazine, or other reporters or representatives) on behalf of the Company or client or provide information or comments to the media on behalf of the Company or client unless specifically authorized to do so by the Company or client's Communications / Marketing Department. If an employee is asked by a member of the media to speak or provide information, documents, or comments on behalf of the Company or client or to identify someone who can speak on behalf of the Company or client, the employee should report the request to their supervisor and/or the Company's or Client's Communications / Marketing Department immediately.

This policy in no way prohibits employee communications that are protected or required under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to speak with others about their terms and conditions of employment.

## **V. GENERAL POLICIES & PROCEDURES**

### **A. RULES OF CONDUCT**

The Company endeavors to maintain a positive work environment. Each employee plays a role in fostering this environment. Accordingly, we all must abide by certain rules of conduct, based on common sense and fair play.

Because everyone may not have the same idea about proper workplace conduct, it is necessary to adopt and enforce rules all can follow. The following are examples of some but not all conduct which may subject the offender to disciplinary action, up to and including discharge, in the Company's sole discretion:

- Obtaining employment on the basis of false or misleading information;
- Recording the work time of another employee, allowing any employee to record another employee's work time, or allowing falsification of any timecard, whether yours or that of another employee;
- Stealing, removing or defacing Company, client or co-workers' property;
- Violation of the Discrimination, Harassment & Retaliation Prevention Policy;
- Violation of the Substance Abuse Policy;
- Violation of the Workplace Violence Policy;
- Violation of the company's Ethical Expectations & Related Policies;
- Violation of the Attendance Policy;
- Loitering, loafing, or sleeping during work time, or leaving a work area without the permission of management;
- Failing to observe working schedules, including meal and rest breaks, working overtime without authorization, or refusing to work assigned hours;
- Abusing or misusing paid sick leave (note: for employees subject to mandatory sick leave laws, the provisions of the applicable policy govern sick leave issues);
- Potentially unwelcome, offensive, or harmful workplace jokes, pranks, or horseplay, which includes (but is not limited to) running, chasing, pulling chairs out from under people, or rough play;
- Sabotaging another's work, or interfering with a person's ability to do their job;
- Insubordination to a lawful management directive;
- Gambling on Company property;
- Theft, or willful or careless destruction or damage to Company or client assets or to the equipment or possessions of another employee;
- Wasting work materials;
- Performing work of a personal nature during working time;
- Unsatisfactory job performance; or
- Any other violation of Company policy.

Obviously, not every type of misconduct can be listed. The Company may at any time, without following any formal system of discipline or warning, exercise discretion to utilize corrective action/discipline that is less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, and suspensions. Although

one or more of these forms of discipline may be taken, no formal order or procedures are necessary. The Company reserves the right to impose discipline up to and including immediate discharge, whenever the Company or the client deems it appropriate to do so.

The observance of these rules will help to ensure that the workplace remains a safe and desirable place to work.

## **B. ATTENDANCE**

Each of our employees performs an important function at the Company. As with any group effort, operating effectively takes cooperation and commitment from everyone. Therefore, attendance and punctuality are very important. Unnecessary absences, lateness and/or early departures are expensive, disruptive, and place an unfair burden on other employees and supervisors. We expect excellent attendance from all employees. Excessive absenteeism, tardiness and/or early departures may result in disciplinary action, up to and including discharge. We expect each member of our team to avoid these problems whenever possible.

We do recognize, however, that there are times when absences, tardiness and/or early departures cannot be avoided. In such cases, employees are expected to notify their client supervisor as early as possible, but at least one hour before the start of the employee's workday, except in cases of extreme emergency. Employees must contact their supervisor every day that they are absent unless specifically instructed otherwise such as during an approved leave of absence. If an employee calls in sick for three or more consecutive workdays or has a pattern of absence for medical reasons, the employee may be required to provide their supervisor with a doctor's note on the day the employee returns to work, to the maximum extent permitted by applicable law.

**Unreported absences of three consecutive workdays generally are considered a voluntary resignation of the employee's employment with the Company.**

In evaluating employee attendance and otherwise administering this policy, the Company does not consider absences/tardiness/early departures that are protected by applicable federal, state, or local law.

## **C. DRESS CODE & APPEARANCE**

Expectations for appropriate dress, whether working remotely or at client sites, will be set by the client and employees will need to comply with those expectations. Employees who are unsure of what is expected or have related questions should discuss this directly with their client supervisor, their Creative Circle Recruiter, or with Human Resources.

Nothing in this policy or any related guideline is intended to discriminate against an employee's sincerely held religious beliefs or practices, disability, race or any other basis protected by applicable law, including a hair or facial hair style that is consistent with their cultural, ethnic or racial heritage or identity. Employees who may need an accommodation

based on a sincerely held religious belief or practice, disability, race or any other basis protected by applicable law can contact Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com).

If an employee's appearance fails to meet the standards outlined above, as determined in the Company's or client's sole discretion, the employee may be suspended from working (without pay, if applicable and permitted by applicable law). Further violation of this policy may result in disciplinary action, up to and including discharge.

#### **D. PERSONAL TELEPHONE CALLS**

Disruptions during working time can lead to errors and delays. Therefore, we ask that personal telephone calls be kept to a minimum, and only be made or received after working time, or during meal or break times. Employees should not use client equipment for any personal business.

#### **E. COMMUNICATION & COMPUTER SYSTEMS**

The Company and/or the client's communication and computer systems are the property of the Company and/or the client and are intended for business purposes. This includes computers, related hardware, software and networks as well as telephone, voice mail, e-mail and Internet systems. Any personal use must not interfere with performance or operations, must not result in added expenses to the Company and/or client and must not violate any Company and/or client policy or applicable law. Users have no legitimate expectation of privacy in regard to system usage.

Any and all telephone conversations or transmissions, e-mail or transmissions, or internet access or usage by an employee by any electronic device or system, including but not limited to the use of a computer, telephone, fax machine, scanner, copier, etc. may be subject to monitoring at any and all times and by any lawful means. To that end, the Company and/or client may access its communication and computer systems and obtain the communications and information within or transmitted through the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Company and/or client deems it appropriate to do so. Further, the Company and/or client may review Internet usage. The reasons for which the Company and/or client may obtain such access include but are not limited to: maintaining the systems; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests or requirements; ensuring compliance with Company and/or client policy, procedure, and legal or regulatory requirements, preserving business data, and ensuring that Company and/or client operations continue appropriately during an employee's absence.

The Company and/or client may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The Company's policies including, but not limited to, those prohibiting harassment, in their entirety, apply to the use of the Company's communication and computer systems. Additionally, employees may not use the Company's communication and computer systems in violation of any law including, but not limited to, those related to copyrights and software piracy.

All employees, upon request, must inform management of any private access codes or passwords to work-issued equipment.

No employee may access, or attempt to obtain access to, another employee's communication or computer systems without appropriate authorization.

Employees may not install, duplicate, or remove software on the Company and/or client's computer systems without prior management approval. Personal computers and other electronic devices (cell phones, flash or thumb drives, etc.) may not be connected directly to the Company's computer systems without prior management approval.

Employees may not use any third-party email or instant messaging accounts or services (such as Gmail, AOL, Yahoo, etc.) for business purposes or any purpose on the Company's computer systems that are not ordinarily used in the performance of their job duties. Violation of this policy may result in disciplinary action, up to and including discharge.

## **F. SOCIAL MEDIA**

The Company respects the right of any employee to maintain a blog or website or to participate in social networking on or through websites or services such as Twitter/X, Facebook, LinkedIn, YouTube, Instagram, TikTok, SnapChat or similar sites/services (collectively "social media"). However, to protect the Company's interests and ensure employees focus on their job duties, employees must adhere to the following rules:

- Employees may not use social media during working time, unless specifically authorized to do so as part of their job duties.
- All rules regarding confidential and proprietary business information apply in full to social media. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed through social media.
- When using social media, if an employee expresses either a political opinion or an opinion regarding the Company's actions and also identifies oneself as an employee of the Company (or if it can be inferred that the employee is an employee of the Company), the poster must specifically state that the opinion expressed is the employee's personal opinion and not the Company's position. This is necessary to preserve the Company's goodwill in the marketplace.
- Please do not use discriminatory comments, or make maliciously false statements when commenting about the Company, superiors, co-workers, or our competitors.
- Employees may not use the Company's logos or trademarks for commercial purposes or to endorse any product or service.

- Employees may not make any statement or post any comment or other material endorsing, recommending, or promoting any of the Company's (or any affiliated company's) products or services without disclosing the nature of the employee's relationship with the Company.
- Any conduct which is impermissible under the law if expressed in any other form or forum is impermissible if expressed through social media. For example, posted material that is discriminatory, obscene, defamatory, libelous, or threatening is forbidden.

All other Company policies apply equally to social media. Employees should review this Handbook for further guidance.

The Company encourages all employees to keep in mind the speed and manner in which information posted through social media can be relayed (and often misunderstood) by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their supervisor. When in doubt, do not post! Failure to follow these guidelines may result in discipline, up to and including termination. In enforcing this policy, the Company reserves the right to monitor social media activities of employees, whether or not such activities are conducted with Company resources, to the extent permitted by and in accordance with applicable law.

Nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment.

## **G. SOLICITATION & DISTRIBUTION**

To avoid distractions, solicitation by an employee of another employee is prohibited while either the person doing the soliciting or the person being solicited is on working time.

Distribution of advertising material, handbills, printed or written literature of any kind during working time or in working areas of the Company or the client site is prohibited.

Working time includes the time during which any of the employees involved are actually scheduled to work, but does not include scheduled rest periods, meal breaks and other specified times when employees are not expected to be working.

Solicitation and/or distribution by non-employees on Company premises is prohibited at all times.

## **VI. WORK HOURS, COMPENSATION & EXPENSES**

### **A. WORK SCHEDULES**

Creative Circle's workweek runs from Monday through Sunday. The workday is from 12:00 a.m. to 11:59 p.m. Actual schedules may vary depending upon client, position and location.

### **B. MEAL AND REST BREAKS**

The Company complies with all laws regarding meal and rest breaks. Employees should refer to their state-specific supplement to this Handbook for additional information regarding meal and rest breaks required under state law.

If an employee works in a state where there are no applicable meal or rest break requirements, the Company will provide break time as appropriate, subject to operational needs and supervisor discretion. The Company does not contract to provide such break time in these states.

Authorized rest breaks of short duration (the length of which depends upon applicable law and policy) will be counted as "hours worked" and paid accordingly. Meal breaks lasting 30 continuous minutes or more are not considered "hours worked" for purposes of federal law and will not be paid for nonexempt employees.

Employees must be completely relieved from work duties during any unpaid meal break. Nonexempt employees must record the beginning and ending time of their uninterrupted meal breaks each day on their time records.

### **C. OVERTIME**

When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime hours. When possible, advance notification of these mandatory assignments will be provided. The opportunity to work overtime is at the discretion of management and is based on departmental needs. Any overtime must be authorized in writing in advance by the client supervisor. Any employee who works overtime without authorization may be subject to disciplinary action, up to and including termination.

Any non-exempt employee who works overtime is compensated at the rate of one and one-half times (1½) the employee's regular rate for all time worked in excess of forty (40) hours each workweek, unless otherwise required by applicable law. Overtime pay is calculated based on actual hours worked. Paid time off, holidays or any leave of absence will not be considered hours worked for purposes of performing overtime calculations.

### **D. TIMEKEEPING POLICY**

#### **IMPORTANCE OF ACCURATE TIMEKEEPING**

The proper and prompt recording of time in our electronic timekeeping system is extremely important to Creative Circle, LLC (the “Company”). **It is critical to the Company and to you that you report all your time worked accurately, so that the Company can ensure you are properly paid for all your time worked.** The Company also uses time entries for payroll, attendance, benefit computations, and other important business records. The Company may use time entries to bill clients, including the Government, for work performed. All employees should be aware that federal agencies, including the Defense Contract Audit Agency (“DCAA”), may audit our timekeeping system at any point, with no notice. Any errors discovered during such an audit could compromise our ability to continue providing support services to government customers. Because compliance with the Employee Timekeeping Policy has serious and legal implications, it is critical to the Company.

### **FALSIFICATION OF TIME RECORDS IS PROHIBITED**

It is a serious violation of Company policy for any employee, supervisor, or manager to:

- (1) falsify any timecard, including another employee’s timecard;
- (2) make a false statement or fraudulent representation through improper completion of timecards; or
- (3) instruct another employee to incorrectly or falsely report time worked or alter another employee’s timecard to under- or over-report hours worked.

**Company policy strictly prohibits anyone from instructing an employee to work “off-the-clock” and not report time worked.** If any supervisor, manager, or employee instructs you to do any of the following, you must report it immediately to the Human Resources Department:

- (1) incorrectly or falsely under- or over-report your time worked;
- (2) alter another employee’s time records to inaccurately or falsely report that employee’s time worked; or
- (3) not report time (including overtime) that you worked.

**Falsification of timecards constitutes grounds for severe disciplinary action, up to and including termination of employment.**

### **CERTIFICATION OF TIMECARDS**

When filling out time entries, employees must certify that the time entries are accurately reported. **DO NOT SIGN THIS CERTIFICATION IF THE TIME ENTRIES ARE NOT ACCURATE.**

The timekeeping process allows for corrections of errors. Any errors in time reporting must be reported and will be corrected promptly.

Before submitting your time entries, review them carefully to ensure that all time worked is accurately documented. If there is any doubt or uncertainty about how to report your

time, you should immediately contact your Creative Circle Company Recruiter or Creative Circle Payroll to obtain information or clarification. “Off-the-clock” work means work you perform but fail to report on your timecard. This would include time during your meal break when you perform work, but that you do not report on your timecard. If a supervisor, manager, or other employee instructs you not to report all your working time or to work “off-the-clock”, then you must immediately report that conduct to Human Resources. This includes if a supervisor, manager, or other employee instructs you to reduce the amount of time you have worked, to not record time you have worked, or to not record overtime you have worked. Employees are prohibited from performing any “off-the-clock” work. “Off-the-clock” work means work you perform but fail to report on your timecard. This would include time during your lunch break when you perform work, but that you do not report.

## **NON-EXEMPT EMPLOYEES AND OTHER EMPLOYEES WHO MUST RECORD THEIR TIME WORKED**

### **When Non-Exempt Employees Should Work**

Employees who are classified as non-exempt or otherwise instructed they must record all their time worked, must accurately record the time they work each day, including start, stop, arrival, departure, and meal break times, and not work any time that is not authorized in advance by their Client supervisor. This means such employees must not start work early, finish work late, work during a meal break, or perform any other extra or overtime work unless directed to do so. To clarify, if you come into work early or leave late for personal reasons, you are prohibited from performing any work during that time, unless it has been authorized in advance by your Client supervisor. If it is not possible to obtain advance permission and you perform work before or after your shift or your authorized work hours, you must record it on your timecard so you will be accurately paid. Overtime work performed by a non-exempt employee, whether approved by the supervisor or not, will be accurately paid. However, violations of this policy may lead to disciplinary action, particularly if the Company determines that the employee could have obtained advance permission before performing work before or after their shift. Employees who have questions about when or how many hours they are expected to work should contact their Client supervisor or Creative Circle Company Recruiter.

As explained above (Certification of Timecards), it is a violation of the Company’s policy for anyone to instruct or encourage another employee to work “off-the-clock,” to incorrectly report hours worked, or to alter another employee’s time records. If any employee is directed or encouraged to incorrectly report hours worked, or to alter another employee’s time records, they need to report the incident immediately to Human Resources.

### **Recording Time Accurately on a Timecard**

Work time is any time you are performing activities on behalf of the Company or client, including these examples of working time:

1. Working on client projects;
2. Work related calls;
3. Work related emails;
4. Work related meetings;
5. Work related events where attendance is required;
6. Required training;
7. Meal periods that are less than thirty uninterrupted, consecutive minutes; and
8. Any work performed at the direction of a Supervisor.

If you are not sure if time spent is working time, contact Human Resources.

Employees are to record in their timecard all their time worked.

Recording time worked includes recording start and stop times of work, however, employees do not need to record in and out times for breaks of twenty consecutive minutes or less. Examples of time for which the employee would record stop and start times are duty-free personal activities exceeding twenty consecutive minutes, including, medical appointments, shopping, school or child-care activities, or a meal break of thirty consecutive minutes or more that are uninterrupted by Company work activities.

### **How to Complete Your Timecard**

It is the Company's policy and practice to pay employees for any and all time they work. The Company provides an electronic timekeeping system for employees to report their time worked. If you are classified as a non-exempt employee or otherwise instructed that you must record your time worked each day, you must maintain an accurate record of the actual time you worked daily. Time entries need to be entered accurately to the minute, including workday start and stop times, time-in and time-out entries for personal time of more than twenty consecutive minutes, and meal breaks of thirty consecutive, duty-free minutes or more. The time entries should be entered at the time particular events occurred, for example when you start work in the morning, and when you start and stop a meal break. Remember, you should not work during your thirty minute meal breaks and you must record your uninterrupted meal breaks on your timecard as non-working time. If your thirty minute meal break is interrupted by work, you should record that meal period as working time. Any work you perform must be recorded on your timecard to ensure you will be accurately paid. Employees should not wait until the end of a pay period to record time entries.

Time entries for each workweek must be submitted to your Client supervisor by the Monday following the end of the workweek, for their review and approval. Your Client supervisor will then review the time entries for accuracy and completeness and either approve or reject the entry. If a time entry is rejected, the employee will be responsible for correcting the entry promptly and within one working day of being notified of its

rejection. If the employee disagrees that the time entry was inaccurate, that disagreement should be discussed with the employee's Client supervisor. If the employee is unable to resolve the disagreement with their Client supervisor, the employee should escalate the issue to the Company Recruiter. If, after escalating to their Company Recruiter the disagreement remains unresolved, the employee should escalate the issue to Human Resources (see Time Reporting Complaints below.)

As explained above (Certification of Timecards), each employee must sign their electronic timecard to verify that the reported time worked is complete and accurate. **BUT DO NOT SIGN THIS CERTIFICATION IF THE TIME ENTRIES ARE NOT ACCURATE.** If there is an issue with accuracy of the timecard that cannot be resolved with the employee's Client supervisor or Company Recruiter, the employee must contact Human Resources. Any employee who fails to report their time worked or inaccurately or incompletely reports their time worked will be subject to disciplinary action, up to and including termination.

## **TIME REPORTING COMPLAINTS**

The Company is committed to paying its employees for any and all time they work, in accordance with state and federal law. If any employee is directed or encouraged to incorrectly report hours worked, or to alter another employee's time records, they shall report the incident immediately to their Company Recruiter, or Company Human Resources. The Company does not tolerate, authorize, or permit "off-the-clock work". "Off-the-clock" work means work an employee performs but fails to report on their timecard. This would include, without limitation, time during an employee's meal break when the employee performs work but does not report the time worked. Off-the-clock work is a violation of the Company's policies. As explained in the Company's Timekeeping Policy, it is a violation of Company policy for anyone to instruct or encourage another employee to work "off-the-clock," to incorrectly report hours worked, or to alter another employee's time records. This policy contains a complaint form to be used for reporting such Timekeeping Policy violations to Human Resources. This policy protects all Company employees who make a good faith report of Time Reporting Policy violations. Employees who violate the Company's Time Reporting policy are subject to discipline up to and including the possibility of immediate termination of employment.

Further, if any employee is found to have committed time reporting violations, such employee may be personally liable. Every employee has a responsibility to help protect the Company's reputation and to prevent unethical or unlawful actions from happening. Any employee who believes they have been instructed to incorrectly report their time worked, must notify their Company Recruiter or Company Human Resources Department as soon as possible. It is the responsibility of each employee to immediately report any violation or suspected violation of the Company's Timekeeping Policy to one or more of the people identified above. Supervisors, managers, and other upper management must immediately report any incidents of a complaint of Timekeeping Policy violation to the Human Resources Department. Although verbal

complaints are accepted, we strongly encourage the use of the attached complaint form. The Company will investigate the matter and take such prompt and immediate action as is warranted under the circumstances. Every complaint will receive a fair, impartial, and timely investigation by qualified personnel that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation will be documented and tracked for reasonable progress and receive timely closure. If misconduct is found, appropriate remedial measures will be taken. While it is not possible to guarantee total confidentiality, the Company will limit disclosure of the matter to the extent practical consistent with its measures to follow up on complaints, including, but not limited to, investigation, remedial action, and any required reporting.

Employees have the right to complain without fear of retaliation. The Company will not take any action against any employee who reports suspected violations in good faith. The Company and the law forbid retaliation against any employee who in good faith complains about time reporting violations to the Company, files a complaint, testifies, assists, or participates in any manner in an investigation, proceeding, or hearing conducted by the Company, or any government agency regarding wage and hour violations. Both the state and federal governments have agencies whose purpose is to address wage and hour violations in the workplace.

## Timekeeping Policy Complaint Form

Name: \_\_\_\_\_ Client name: \_\_\_\_\_

Client supervisor: \_\_\_\_\_

Type of Complaint: \_\_\_\_\_

Date incident reported: \_\_\_\_\_ Reported to: \_\_\_\_\_

Please describe the specifics of the Timekeeping Policy violation(s) you believe you have experienced: \_\_\_\_\_

\_\_\_\_\_

What is/are the date(s) the incident(s) occurred?

\_\_\_\_\_

Please describe the incident(s) including what occurred, when it occurred, and whether there were any witnesses other than yourself to the incident(s). If necessary, attach additional sheets of paper.

\_\_\_\_\_

Please describe what, if anything, you have done in order to attempt to address the situation yourself. If you have not tried to address the situation yourself, please explain why.

\_\_\_\_\_

Are you aware of any other person who has been subjected to similar incident(s) or retaliation? If so, please identify such person(s) and describe the details, including when and what occurred.

\_\_\_\_\_

Other than the individual(s) you have identified above, is/are there any other person(s) who you feel should be contacted in connection with the investigation of this complaint. If so, please identify the individuals, how to contact them, and what information these individual(s) may have.

\_\_\_\_\_

If, at any time, you feel that, as a result of a complaint, or your participation in the investigation of a complaint, you are being retaliated against, please file an additional complaint using this form. If necessary, attach additional sheets of paper.

Your Timekeeping Policy or related retaliation complaint will be promptly and thoroughly investigated. The Company will try to limit disclosure of the matter(s) to the extent practical consistent with its measures to follow up on complaints, including, but not limited to, investigating, remedial action, and any required reporting. If the investigation verifies that the Company's Timekeeping Policy has been violated or related retaliation has occurred, appropriate disciplinary action will be taken against the person who has engaged in such conduct.

If you have not received any response to your Complaint in two business days, contact the phone number below.

Please read the above carefully before signing. Your signature below will indicate that this form accurately and completely describes your Timekeeping Policy or retaliation complaint.

Employee Signature:	Date:
Please print name:	

**PLEASE REPORT THIS INCIDENT IMMEDIATELY TO HUMAN RESOURCES:**

**Phone Number:** 323-930-2333    **Email:** HumanResources@creativecircle.com

By clicking 'I have read and acknowledge' in your Pay Rate Confirmation, you acknowledge that you have received and read the Employee Timekeeping Policy from your employer, Creative Circle, LLC.

## E. PAYROLL

Regular paydays are weekly, every Friday. Your first paycheck will be paid Friday after your first workweek.

For employee convenience, Creative Circle offers direct deposit of paychecks. Employees who elect direct deposit are encouraged to enroll as soon as they are placed on an assignment.

For those employees who do not elect to be paid via direct deposit or until direct deposit is active, paychecks are mailed to the employee's address we have on file. It is your obligation to keep us updated with your current address.

Employee payroll stubs itemize deductions made from gross earnings. The Company is required by law to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions include any court-ordered garnishments. Payroll stubs also itemize any voluntary deductions such as an employee's portion of health, dental, or life insurance premiums and/or voluntary contributions to a 401(k) or pension plan, to the extent applicable.

When employees receive their paychecks, they should verify immediately that their working time was recorded accurately and that they were paid correctly for all hours worked. **Employees who believe there is an error in their pay should bring the matter to the attention of Payroll immediately, so that the Company can investigate and resolve the matter quickly and amicably.**

## F. EXPENSE REPORTING & REIMBURSEMENT POLICY

This policy establishes the procedures all employees must follow when they are required to incur business-related expenses. Employees are expected to obtain written approval from the client before incurring any expenses while conducting business for the client. Such expenses must be reasonable in the circumstances, necessary and incidental to the performance of the company business involved and, unless otherwise required by applicable law, for the primary benefit of the client rather than the employee.

### **Expense Reporting**

Employees must properly substantiate all business expenses submitted for reimbursement in accordance with this policy.

Employees are responsible for properly substantiating all charges incurred on behalf of the Company or the client. All expense reports should be submitted in a timely manner, no later than 30 calendar days from the date the expense was incurred. Expenses submitted more than 30 calendar days after being incurred may be denied for reimbursement, at the Company's discretion, unless otherwise required by applicable law.

Employees are expected to submit original receipts or other supporting documentation for all business expenses incurred on behalf of the Company or client in accordance with this policy. However, if a receipt or other supporting documentation is missing, lost, or nonexistent, please contact your Recruiter to discuss whether reimbursement may still be available.

### **Reimbursement**

The Company will not reimburse employees for any expenses that are not required by the Company or the client to be incurred by the employee, or that inure to the primary benefit of the employee, rather than the Company or client, unless otherwise required by applicable law or Company policy. This includes, but is not limited to, expenses an employee incurs by purchasing smartphones or other electronic devices that the employee owns, voice or data plans on such devices, Internet service at the employee's residence, other home-office equipment or furniture, and like expenses. Even if items or services such as these are used for business purposes at times, employees are generally not required to purchase them in order to perform their job duties, and they are primarily for the employee's benefit rather than the Company's. Accordingly, expenses for items or services of this nature will not be reimbursed by the Company, unless otherwise required by applicable law or Company policy.

## **VII. BENEFITS OVERVIEW**

Creative Circle temporary employees are eligible for various benefits including ACA (Affordable Care Act) qualified medical insurance, critical illness and accident, life and dental insurance, vision insurance, holiday pay, and a 401(k) plan with a company match. Some of these benefits are available immediately upon the start of an assignment, and others require that the employee meet certain hours requirements. Benefit information can be found at <https://www.creativecircle.com/candidateinfo/>. Questions can be sent to [benefits@creativecircle.com](mailto:benefits@creativecircle.com).

### **A. PAID LEAVE**

Employees working in certain locations may be entitled to paid sick leave benefits or paid time off due to laws specific to that jurisdiction. Please check the applicable State Supplement or these [Labor Law Postings](#) for more information.

### **B. JURY DUTY LEAVE**

The Company realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees are allowed time off to perform such civic service as required by applicable law. Employees are expected, however, to provide the Company with proper notice of their request to perform jury duty and management should be informed of the expected length of jury duty service. If the required absence presents a serious conflict for management, employees may be asked to try to postpone jury duty. Employees must report to work for the major portion of the day if excused by the court unless such a requirement is restricted by applicable law. Employees also must provide verification of service. Jury duty leave will be unpaid, unless otherwise required by applicable law. Any pay provided for time spent on jury duty leave is not counted as hours worked for purposes of calculating overtime. Employees may elect to use any available paid time off during an otherwise unpaid jury duty leave. The substitution of paid time for unpaid leave time does not extend the length of leave and the paid time will run concurrently with any jury duty leave entitlement.

### **C. MILITARY LEAVE**

Employees who are called into active military service or who enlist in the uniformed services are eligible to receive a military leave of absence in accordance with applicable federal and state laws. To be eligible for military leave, employees must provide management with advance notice of their service obligations, unless they are prevented from providing such notice due to military necessity or it is otherwise impossible or unreasonable to provide such notice. In such instances, an employee should provide notice as far in advance as is reasonable under the circumstances.

Employees who are required to attend yearly Reserves or National Guard duty can apply for a temporary military leave of absence not to exceed the number of days allowed by law (including travel). Such employees should give management as much advance notice of their need for military leave as possible so that we can maintain proper coverage.

Military leave will be unpaid, unless otherwise required by applicable law. Employees may elect to use any available paid time off during an otherwise unpaid military leave. The substitution of paid time for unpaid leave time does not extend the length of leave and the paid time will run concurrently with any military leave entitlement.

Employees whose absence does not exceed applicable statutory limitations will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws.

Please speak to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) for additional information about eligibility for Military Leave.

## **D. FAMILY AND MEDICAL LEAVE (“FMLA”)**

### **Eligibility Requirements**

Employees are eligible for FMLA if:

- At least fifty (50) or more employees are employed within a 75-mile radius of the employee’s work site;
- The employee has been employed for at least one year; and
- The employee has worked at least 1,250 hours within the previous twelve (12) months.\*

*\*Special hours of service requirements apply to airline flight crew employees.*

### **Basic Leave Entitlement**

The FMLA requires covered employers to provide up to twelve (12) weeks of unpaid, job-protected leave in a 12-month period to eligible employees for certain family and medical reasons. The 12-month period is determined on a “rolling” 12-month period dating back from the time the employee uses any FMLA leave. Leave may be taken for any one, or for a combination, of the following reasons:

- To care for the employee’s child after birth, or placement for adoption or foster care;
- To care for the employee’s spouse, son or daughter, or parent (but not in-law) who has a serious health condition; and/or
- For the employee’s own serious health condition (including any period of incapacity due to pregnancy, prenatal medical care or childbirth) that makes the employee unable to perform one or more of the essential functions of the employee’s job.

Leave to care for the employee’s child after birth, or placement for adoption or foster care must be taken within one (1) year of the child’s birth or placement.

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee’s job, or prevents the qualified family member from participating in school or other daily activities. Subject to certain conditions, the continuing

treatment requirement may be met by a period of incapacity of more than three (3) consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

### **Military Family Leave**

Eligible employees with a spouse, son, daughter, or parent (but not in-law) on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty) in the Reserve component of the Armed Forces for deployment to a foreign country in support of a contingency operation or Regular Armed Forces for deployment to a foreign country 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, caring for the parents of the military member on covered active duty and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement which permits eligible employees (spouse, son, daughter, parent (but not in-law) or next of kin of a covered service member) to take up to twenty-six (26) weeks of leave to care for a covered service member with a serious injury or illness during a single 12-month period (one time basis only). A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is on the temporary retired list, for a serious injury or illness. These individuals are referred to in this policy as “current members of the Armed Forces.” Covered servicemembers also includes a veteran who is discharged or released from military services under condition other than dishonorable at any time during the five year period preceding the date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation or therapy for a serious injury or illness. These individuals are referred to in this policy as “covered veterans.”

The FMLA definitions of a “serious injury or illness” for current Armed Forces members and covered veterans are distinct from the FMLA definition of “serious health condition” applicable to FMLA leave to care for a covered family member.

### **Job Benefits and Protection**

If applicable, during FMLA leave, the Company must maintain health coverage under any “group health plan” on the same terms as if the employee had continued to work. If paid time off is substituted for unpaid leave, the Company will deduct the employee’s portion of any applicable health plan premium as a regular payroll deduction. If the employee’s leave is unpaid, the employee must make arrangements with Human Resources prior to taking leave to pay their portion of any applicable health insurance premiums each month.

The Company's obligation to maintain health care coverage ceases if an employee's premium payment is more than 30 days late. If an employee's payment is more than 15 days late, the Company will send a letter notifying the employee that coverage will be dropped on a specified date unless the co-payment is received before that date. If employees do not return to work at the end of the leave period (unless employees cannot return to work because of a serious health condition or other circumstances beyond their control), they will be required to reimburse the Company for the cost of the premiums the Company paid for maintaining coverage during their unpaid FMLA leave. For purposes of this paragraph, an employee will be considered to have returned to work if the employee returns to work for at least 30 calendar days, or the employee retires at the end of the FMLA leave period or within 30 days thereafter.

Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

The use of FMLA leave cannot result in the loss of any employment benefits that accrued prior to the start of an employee's leave.

### **Use of Leave**

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the Company's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

### **Substitution of Paid Leave for Unpaid Leave**

Employees may use accrued sick time (to the maximum extent permitted by applicable law) while on unpaid FMLA leave. The substitution of paid time for unpaid FMLA leave time does not extend the length of FMLA leaves and the paid time will run concurrently with an employee's FMLA entitlement. Receipt of disability benefits, Workers' Compensation benefits or other monetary benefits does not extend the maximum amount of leave time to which an employee is eligible under the FMLA.

### **Employee Responsibilities**

Employees must provide thirty (30) days' advance notice of the need to take FMLA leave when the need is foreseeable. When thirty (30) days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with the Company's normal call-in procedures.

Employees must provide sufficient information for the Company to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions; the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the Company if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees may

also be required to provide medical certification and periodic recertification supporting the need for leave.

### **Employer Responsibilities**

Covered employers must inform employees requesting leave whether they are eligible under the FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for ineligibility.

Covered employers must inform employees if leave is designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

### **Unlawful Acts by Employers**

FMLA makes it unlawful for the Company to:

- Interfere with, restrain, or deny the exercise of any right provided under the FMLA;
- Discharge or discriminate against any person for opposing any practice made unlawful by the FMLA or for involvement in any proceeding under or relating to the FMLA.

Concerns regarding a possible violation with respect to either of these obligations should be reported to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com).

### **Enforcement**

Employees may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement, which provides greater family or medical leave rights.

## **E. OTHER LEAVES OF ABSENCE**

Many states require employers to provide their employees with additional leaves of absence, such as pregnancy disability leave, bone marrow donation leave, and school activities leave. Please check the applicable state supplement to this Handbook and the [Labor Law Postings](#) for additional information and contact Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com) with any questions.

## **A FEW CLOSING WORDS**

This Handbook is intended to provide a broad summary of things our employees should know about the Company. The information in this Handbook is general in nature and, should questions arise, employees should consult their Recruiter or Human Resources for complete details. While we intend to continue the policies, rules, and benefits described in this Handbook, the Company may always modify the matters set forth in this Handbook in its sole discretion, to the maximum extent permitted by applicable law. Please do not hesitate to speak to your Recruiter or Human Resources with any questions about the Company or its personnel policies and practices.

**DISCRIMINATION, HARASSMENT & RETALIATION COMPLAINT FORM**

If you believe that you have been subjected to conduct in violation of the Company’s Discrimination, Harassment & Retaliation Prevention Policy, including any applicable state supplement, you are encouraged to complete this form and submit it to Human Resources at [humanresources@creativecircle.com](mailto:humanresources@creativecircle.com). If you are more comfortable reporting verbally or in another manner, you may do so and can follow the guidelines set forth in the Company policy. You will not be retaliated against for filing a complaint. Once a complaint is received, the Company will follow the investigation process described in our policy.

**General Information**

Your Name / Job Title:

Your Client / Recruiter:

Preferred Communication Method (if via e-mail or phone, please provide contact info):

**Complaint Information**

Please tell us who you believe has violated our Discrimination, Harassment & Retaliation Prevention Policy. What is their relationship to you (e.g., Supervisor, Subordinate, Co-Worker, Other):

Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

Please provide specific date(s) the alleged misconduct occurred. Additionally, please advise if the alleged misconduct is continuing.

Please list the name and contact information of any witnesses or individuals who may have information related to your complaint.

*This last question is optional, but may help the investigation*

Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## **STATE SUPPLEMENTS**

**The State Supplements are an important part of this handbook. Please click [<here>](#) to access and review the state supplement which applies to you.**

## **RECEIPT OF EMPLOYEE HANDBOOK**

This Employee Handbook, including any applicable state supplement, is an important document intended to help you become acquainted with the Company. This document contains management guidelines only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because the Company's operations may change, the contents of this Handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management, unless otherwise restricted by applicable law.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this Employee Handbook.

**I have received and read a copy of the Company's Employee Handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of the Company at any time, unless otherwise restricted by applicable law.**

**I understand that, unless otherwise provided by applicable law, my employment is terminable at will, either by myself or the Company, regardless of the length of my employment or the granting of benefits of any kind. I further understand that no representative of the Company other than the President is authorized to provide any employee or employees with an employment contract or special arrangement concerning terms or conditions of employment and that any such agreement must be in writing and signed by the President.**

**I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Company's Employee Handbook.**

Employee's Printed Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**RECEIPT OF THE COMPANY'S DISCRIMINATION, HARASSMENT  
& RETALIATION PREVENTION POLICY**

I acknowledge that I have received, read, and understand the Company's Discrimination, Harassment & Retaliation Prevention Policy, including any applicable state supplement. I understand that I am expected to abide by and be bound by the rules, provisions and standards set forth in the Company's policy. I further acknowledge that the Company reserves the right to revise, delete, and add to the provisions of the Discrimination, Harassment & Retaliation Prevention Policy at any time, to the maximum extent permitted by applicable law. *California Employees: I also acknowledge I have received the California Civil Rights Department's Sexual Harassment Fact Sheet (CRD-185).*

Employee's Printed Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Date: \_\_\_\_\_