



creativecircle

DIGITAL + CREATIVE STAFFING



creativecircle.com

WELCOME TO CREATIVE CIRCLE

Freelance Employee Handbook

Table of Contents

2. Our Hiring Practices

Pre-employment Paperwork
Offers of Assignment
Reference Checks, Background Checks & Drug Testing
Benefits
WOTC

4. Now that You are on the assignment

Timekeeping
Payroll Information
Self-Service
Overtime and Meal/Rest Periods
Leaves of Absence
FMLA
Military Leave
Sick Pay Expenses
The 12-Month Working Agreement
Non-Exclusivity
Unemployment
Verification of Employment
Keeping in Touch

12. Your Responsibilities & Standards of Conduct

Ethical Business Practices
Meeting Client Expectations
Attendance & Punctuality
Drugs & Alcohol
Maintaining a Violence-Free Workplace
Company Property
Workplace Searches
Use of Electronic Media
Confidentiality

15. Key Employment Policies

Equal Employment Opportunity (EEO) Policy
Discrimination & Harassment Policy
Complaint Procedure
Disability Accommodations
Safety
Employment Law

Congratulations!

You've just joined the roster of the best and brightest creative pros in the country. As the newest member of our incredibly talented team, you can look forward to rewarding assignments at the top advertising, design, marketing and digital firms around.

About This Guide

To ensure a great experience at your new assignment and to help you succeed there, we've created this handbook to tell you what you can expect from Creative Circle and what we expect from you.

If you have any questions about anything in this booklet, please contact a recruiter in your local office or call the Human Resources department at [323-930-2333](tel:323-930-2333).

Thank you for joining Creative Circle.
We're thrilled to have you on the team.

The Fine Print

- The contents of this handbook don't constitute a contract or a guarantee of continued employment.
- Employment with Creative Circle is 'at-will'. Either you or the company may terminate the employment relationship at any time, with or without cause or notice. Creative Circle is a division of On Assignment and this 'at will' policy cannot be changed, unless done so in writing by On Assignment's Chief Executive Officer.
- From time to time it may be necessary for the company to revise any, or all, of this Freelance Employee handbook. The company reserves the right to do so and will keep the online version updated with the most recent changes. Please review the handbook periodically as you will be responsible for adhering to all the guidelines and policies it contains. It can be viewed at creativecircle.com/candidateinfo.

Our Hiring Practices

Pre-employment Paperwork

There are several documents you completed (perhaps electronically) before you were placed on assignment. These included a candidate profile and an I-9 form if you are working in the US. Throughout your employment with us, we may ask you to update your candidate profile (specifically the skills section) and to provide us with an updated resume and portfolio so that we can present you to clients with your latest work product.

If your skills and/or portfolio have changed significantly, please notify a Recruiter in your local office so that we can update this information.

The I-9 form and accompanying e-verify process is important to ensure you have a legal right to work in the US. As mandated by law, you are required to complete this form along with required documents before we can place you as a freelance employee with our clients. Depending on the length of time between assignments, how long ago you completed an I-9 form with us, and whether one of the documents you used to verify your identity or right to work in the US has expired, we may need you to come back into the office to complete a new form at some point during your employment with us.

If you are placed in a regular full-time position working for one of our clients directly, you will be asked to complete an I-9 with your new employer.

Offers of Assignment

All offers of work at Creative Circle's client facilities will be made based on skills, experience and availability. Please keep in touch with the Creative Circle recruiting team at your local office regarding your availability and provide an updated resume when you acquire new skills or experience. This will ensure that our Recruiters are equipped to find you the best possible work opportunities.

When Creative Circle has an assignment that matches your background, a Recruiter will contact you to check on your interest and availability. If you are interested in the assignment, you should follow up immediately either via email or by phone. Do not hesitate to decline an assignment if you have prior commitments that will prohibit you from completing it. Don't worry, declining an assignment will not prevent you from being considered for other assignments in the future.

Once you have accepted an assignment, we expect that you will continue on that assignment until the project is

completed or the assignment ends. When you are no longer on assignment with any Creative Circle Client, you will be placed on terminated status. You will remain in our candidate pool and will be rehired when you begin a new assignment.

Please advise your office's recruiting team immediately if you are no longer available for work through Creative Circle so that we can note this in your candidate profile. Of course, should you become available again, let us know and we'll ensure your candidate file is updated. If it's been a while since we last worked with you, we may ask you to come in to refresh your skill profile and job history so that we can accurately present you to our clients. We may also ask you to complete certain employment forms (e.g., the I-9) again if needed.

Reference Checks, Background Checks & Drug Testing

Creative Circle complies with the policies and practices of clients that require us to conduct pre-employment background checks on candidates who accept an assignment with them. The specific information obtained in a background check is dictated by our clients and may include verification of any information on the candidate's resume or application form as well as educational and employment history, criminal records and history, credit reports and credit history information, public court records (e.g., bankruptcies, tax liens and judgments), motor vehicle and driving records, drug/alcohol test results, and Social Security verification and address history, subject to any limitations imposed by applicable federal and state law. This information may be obtained from public records and private sources, including credit bureaus, government agencies and judicial records, former employers, educational institutions and other sources, as required by the client. Creative Circle further ensures that we will comply with all FCRA and CRA requirements as outlined in the background disclosure notices.

When a background check is required by our client, all offers of assignment are conditioned on receipt of a background check result that is acceptable to that client. Reports are kept confidential and are only viewed by individuals in Creative Circle's Human Resources department.

If information obtained in a background check would lead Creative Circle or the client to deny employment, a copy of the report will be provided to the candidate, and the candidate will have the opportunity to dispute the report's

accuracy.

In addition, as part of our commitment to clients, Creative Circle conducts separate reference checks with the references you provided to us as part of your application process. Typically, these checks are conducted prior to your first assignment, but occasionally, they may occur later. We will not contact your current employer if you request that we not do so. Whereas background and/or drug testing may occur throughout your employment relationship with Creative Circle to meet the needs of individual clients, references are most commonly conducted only once and will not need to be repeated.

Benefits

As a Creative Circle temporary freelance employee, you 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 401k plan with a Company match. Some of these benefits are available to you immediately upon the start of an assignment and others require that you

meet certain hours requirements. Benefit information can be found at creativecircle.com.

Questions can be sent to benefits@creativecircle.com.

WOTC

When you came to Creative Circle for your interview you should have seen the notice that we are a WOTC employer. This means that we participate in the federal program known as The Work Opportunity Tax Credit (WOTC).

This program is designed to encourage employers to hire and retain employees from certain targeted groups and individuals living in certain areas. Due to our participation, our parent company, On Assignment, may receive tax credits for hiring people in these groups. Upon hire you received, or will receive, a request to complete a WOTC questionnaire. Completing the questionnaire is voluntary and you can choose not to participate if desired.

Now That You're on Assignment

Timekeeping

The first time you begin a new assignment with Creative Circle, you will be sent login credentials for our timecard portal. At the end of each week you're on assignment:

- Fill out your timecard accurately and completely within the portal
- Use the portal to submit your timecard to your client supervisor for authorization
- Ensure your supervisor authorizes the completed timecard by the payroll deadline, which is every Monday at 5:00 pm Pacific Time (subject to change on pay periods surrounding holidays)
- Watch for an email confirmation that your timecard has been processed by the payroll team
- More information about the timecard portal, including a link to the portal itself and a brief video with further instructions on how to use it, can be found at creativecircle.com/candidateinfo.

Payroll information

Creative Circle's pay period runs Monday through Sunday. Paydays are on each Friday following the end of the pay period. In order to be paid each Friday, your client supervisor must approve your timecard by 5:00 pm

Pacific Time on the Monday following the end of each pay period. Timecards received after the Monday deadline will be processed with the following week's payroll.

Paychecks will be mailed to the address we have on file for you, unless you sign up for Direct Deposit. Direct Deposit is a no-cost, safe and efficient way to deposit your paychecks to the financial institution of your choice. If you choose Direct Deposit, your weekly pay statement can be viewed electronically via the ADP self-service portal (information below) or they too will be mailed to you each week to the address we have on file. Payroll deductions, including state and federal income and other taxes, will be deducted pursuant to state and federal laws, based on your completed and signed W-4 and state withholding forms. You can change your federal deduction at any time by logging into the ADP self-service portal described below; however, all state forms must be completed and emailed/faxed to the payroll department for processing.

If you are not signed up for Direct Deposit and have not received your check within 5 business days, please notify our payroll department so that we can issue a new check and stop payment on the original.

You can find information on how to sign up for Direct Deposit or change your federal or state tax deductions

at creativecircle.com/candidateinfo. Contact payroll by emailing us at payroll@creativecircle.com or calling 323-930-3112.

Self Service (Tracking Your Pay Electronically)

Through ADP, Creative Circle's payroll provider, we are able to offer you online access to your earnings statements and W-2 forms, as well as the ability to edit your W-4 and set up your direct deposit 24 hours a day, 7 days a week. This is available through ADP's self-service portal. To register with self-service:

- Before registering, it is important to wait until your first timecard has been entered and processed.
- Once you have submitted your first timecard, please visit workforcenow.adp.com.
- Click on 'Register now'.
- Enter the Self Service Registration Pass Code found on the timecard portal homepage.
- Enter personal information as instructed (name, DOB, etc.).
- Enter the last 4 digits of your Social Security Number.

You will then be prompted to complete a registration process during which you must answer a few security questions and select a password. Your password must contain between 8 to 20 characters and at least one alpha and one numeric character. You will be assigned a system-generated user ID.

After completing the registration process, you may access your pay statements, edit your W-4 and view your historical pay data. A quick reference guide for ADP i-Pay can be found at creativecircle.com/candidateinfo.

During the registration process, you will be given the option to 'Go Green.' By agreeing to this option, you will receive all of your pay information electronically and will no longer receive printed and mailed pay statements. Although this option is not mandatory, we encourage you to join with us in supporting a green philosophy.

Overtime and Meal/Rest Periods

You are classified as a temporary, non-exempt employee regardless of your job title or responsibilities while on assignment. As a non-exempt employee, you will be eligible to receive overtime pay and will be required to take legally mandated meal and rest periods. Please ensure you have the approval of your client supervisor to work overtime before you actually incur it.

In most states, overtime is paid at 1 ½ times your regular hourly wages for all work in excess of 40 hours per workweek. Additionally, some states provide overtime pay at 1 ½ times your regular hourly wages for all work in excess of eight hours per day. If you have questions, please consult a Creative Circle Recruiter or the Human Resources team regarding overtime laws in your state.

Each state also has guidelines regarding required meal and rest periods. Mandated meal/rest periods should be taken without exception. Rest periods are typically 10 minutes per each four hours worked and are typically paid. Similarly, in most states you are entitled to at least a 30-minute unpaid meal period if you work 5 or more hours per day. This break must be notated on your timecard.

Leaves of Absence

If you'd like to take time off and would prefer we not present you for any job opportunities for a period of time, let us know. We can place you in a 'do not contact' status at any time (provided you're not currently on assignment). We will put you back on 'active' status again when you're ready.

If you need to take a period of time off work while you're on assignment, and the reason for your time off is covered by state or federally mandated leave provisions, we'll work with you to figure out the details. Creative Circle will provide any state or federally mandated leaves of absence including under the Family Medical Leave Act (FMLA) and USERRA (military leave) both of which are explained below. Some leaves require you to work for the company for a specific length of time or for a certain number of hours within the year or may require a doctor's note before the leave will be granted and again upon your return to ensure you're medically able to resume work. All leaves of absence are unpaid.

During any approved leave of absence, you may retain medical benefits, if you signed up to participate, provided you continue to pay the employee premium for these benefits. Your insurance coverage will cease if your premium payment is more than 30 days late.

Although we will make every effort to return you to the same or equivalent position that you held prior to the start of leave, your right to job restoration, or to other benefits and conditions of employment is no greater than if you had been continuously at work and not taken leave. For example, if the client would have ended your assignment during the leave, or if the assignment was for a specific term or was to work on a specific project and the term or project ended before you returned to work, you will be unable to return to that specific assignment. We will,

however, begin looking for a new assignment that is in keeping with your skills and work goals.

Please consult with a local Recruiter or the Human Resources department at Creative Circle if you need to take a leave of absence and we will explain the specific requirements and parameters of your leave. And of course, keep us informed about your planned date of return when your leave is coming to an end.

Family & Medical Leave (FMLA)

The Company will grant family and medical leave to any freelancer on an active assignment in accordance with the requirements of applicable federal and state law at the time the leave is granted. If eligible, you would be entitled to take up to 12 weeks of unpaid, job-protected leave within a 12-month period. If you are a covered service member's spouse, child, parent or next of kin, you may be entitled to take up to 26 weeks of FMLA in a single 12-month period to care for a service member with a serious injury or illness. When it is medically necessary or otherwise permitted, employees may take leave intermittently. The right to job protected leave is subject also to the normal or anticipated length of the assignment you're in when the leave begins. Your rights to job restoration are no greater than if you had continued on the assignment and not taken leave. In other words, if the assignment ends before you return to work, you will be unable to return to that specific assignment. In that case we will look for a new assignment that is in keeping with your skills and experience.

To be eligible for FMLA, you must:

- Have worked for Creative Circle for at least 12 months
- Have worked at least 1,250 hours over the previous 12 months as of the start of the leave
- Work at a location where we have at least 50 employees within 75 miles of your worksite

FMLA leave may be used for one of the following reasons, in addition to any reason covered by state family/medical leave law:

- Your inability to work because of a qualifying serious health condition.
- The birth of a child or placement of a child for adoption or foster care.
- To bond with a child (within 1 year of the child's birth or placement).
- To care for your spouse, child, or parent who has a serious health condition.
- For qualifying exigencies related to the foreign

deployment of a military member who is your spouse, child, or parent.

Please give us as much advance notice regarding your need for leave as possible, preferably 30 days or more before the start of your leave. Once we receive notice we will put you in touch with the vendor we use who manages our leaves and they will work with you to get the paperwork completed. They will also ensure you receive the proper notices and are informed as to whether you qualify once your application is processed. You do not need to share a medical diagnosis, but must provide enough information to determine if the leave qualifies for FMLA protection. If it is determined that you are ineligible for an FMLA qualified leave, you will be provided with a reason.

You can contact the US department of Labor if you would like additional information or would like to file a complaint. They can be reached at [866.487.9243 \(866.4.USWAGE\)](tel:866.487.9243) or www.dol.gov/whd.

Military Leave

Creative Circle is committed to protecting the job rights of employees absent on military leave. You will not be discriminated against or denied employment, reemployment or any other benefit of employment on the basis of taking a leave protected by the Uniformed Services Employment and Reemployment Rights Act (USERRA) or any other federal or state military leave law. Contact the Creative Circle Human Resources team if you would like more information on our military leave practices.

Sick Pay

Some cities and states have passed sick leave laws and if you work in one of the cities or states impacted, Creative Circle will track and maintain records of your accrued sick leave. If you are covered under sick leave legislation, you can log into the Creative Circle Timecard portal to see how much sick leave you have accrued (if any). Just go to the My Data tab and look for your 'Sick Time Balance.' Although you may begin to accrue and view sick leave as soon as you're on an assignment, sick leave may not be used until the 90th calendar day after your start date with Creative Circle.

Further information, including information on sick pay benefits and rules can be found at creativecircle.com/candidateinfo. The following applies to sick leave:

- Sick leave cannot be claimed for the same hours that are claimed as regular working hours.
- As with all time cards, sick leave requests should be

turned in promptly. Requests for sick leave that are submitted more than 21 days after the actual date(s) of the sick leave will be denied.

- Unused paid sick leave will not be paid out upon termination of an assignment.
- If you are rehired within 12 months of the date of your last assignment, any previously accrued but unused paid sick leave will be reinstated.
- Creative Circle may require reasonable documentation of the reason for requesting sick leave lasting three or more consecutive days.
- If you know you are going to use sick time, you need to inform your client, as well as your Creative Circle Recruiter as soon as possible. Attempting to use sick time that the client and Recruiter are unaware of may not be paid out.

Expenses

While working for Creative Circle, you may incur travel or other related expenses while working for a client. It is important that your client supervisor approve all expenses prior to you incurring them and that you follow their expense reimbursement policy. If you incur expenses, please contact your recruiting team to get instructions on how to submit an expense report. In most cases, you will submit your expense report to us and we will reimburse you and then include the amount on our invoice to the client. But in other cases the client may prefer to reimburse you directly. Reports must be submitted within one month of the expenses being incurred.

The 12 Month Working Agreement

The Candidate Placement Agreement you signed when you started working with us states that “if you receive an offer of full-time, part-time or temporary employment with one of our clients within 12 months of the date we introduce you to this client, or within 12 months after your assignment ends with that client (whichever is later), that employment opportunity needs to go through Creative Circle.” Given the long-term nature of many of our client and candidate relationships, as well as certain contractual obligations, we need to keep track of what happens with you and the clients we introduce you to. A couple of specifics regarding this provision:

- If a client that you have been introduced to through Creative Circle contacts you regarding a job, another project, or an interview, you can either contact the Recruiter who placed you on this assignment or ask the client to contact us directly.
- In the event you’ve never gone on assignment with this client, the 12 months starts from the last point of introduction. This may be a phone screen or an

interview or our initial presentation of your background and portfolio to this client.

- If you have been on multiple assignments with this same client, the 12 months starts from the last day of the last assignment.
- The agreement is company-specific, not job or contact-specific so these guidelines would govern any possible assignment, project, or job at the client we introduced you to.
- Your best bet if you’re unsure about this aspect of our working relationship is to contact someone on your local office’s recruiting team who can answer your questions.

Non-Exclusivity

As you were likely told during your interview, our employment relationship with you is non-exclusive. This is due to the needs of our clients and the fact we are typically placing people in short-term, temporary assignments. It is highly unlikely that we will be able to keep you employed full time on a long-term basis so we encourage you to continue looking for work and to continue your job search independently. Creative Circle is here to supplement your existing search efforts, not to replace them.

Unemployment

Once your assignment has ended, you may be eligible to apply for unemployment in accordance with your state’s unemployment laws. Please inform your recruiter of any changes in your availability to work as soon as possible. Details of your assignment as well as your availability to work are all factors that may affect unemployment eligibility. Creative Circle will review claims received and provide information as requested by state agencies regarding your employment.

Questions regarding unemployment can be directed to HRAdmin@creativecircle.com.

Verification of Employment

If you need to verify employment or income, please direct the request to HRAdmin@creativecircle.com and we’ll be happy to help.

Now that you have joined our team, it is important to keep in touch with your Creative Circle recruiting team on a regular basis, even when you are on assignment.

WHEN TO CONTACT US...

- To communicate your status regarding work availability.

- In response to an email or phone call regarding a possible assignment.
- If you have questions or concerns about your assignment, timecard or paycheck.
- If you have been asked to do work other than what was originally described to you or work for which you feel unqualified.
- If you are injured on the job or are concerned about your safety while on assignment.
- If you feel you are being treated unfairly, are being harassed, or feel uncomfortable in any way.
- If the client extends the assignment past the original time frame or offers you regular, full-time employment.
- If the client refers you to another company for freelance, temporary or full-time employment.

Additionally, we need to be able to reach you so please notify us if you change your address or phone number. A change of address form can be found at www.creativecircle.com/candidateinfo.

Please turn in a completed form to payroll@creativecircle.com or via fax to [323-930-2366](tel:323-930-2366).

Your Responsibilities & Standards of Conduct

Ethical Business Practices

Creative Circle conducts its business affairs with honesty, integrity, and in compliance with governmental rules and regulations. We adhere to the highest standards of business ethics in dealing with our employees, clients, vendors and the general public. As a Creative Circle employee, you are expected to conduct yourself honestly, ethically, and in compliance with all applicable laws, rules and regulations at all times.

Meeting Client Expectations

While performing your job duties, interacting with clients, attending company or client sponsored events, traveling on behalf of a client, and communicating via phone or email, how you behave is a reflection of both yourself and Creative Circle. Therefore, it is important to understand that we expect everyone associated with our Company to hold themselves to the highest standard of conduct. We ask that you conduct yourself in a manner that will strengthen Creative Circle’s reputation with customers, vendors, fellow employees, and the business community.

All client and Creative Circle employees must be treated with courtesy and respect at all times. Our clients vary in terms of their values, culture and expectations in regards to work ethic and communication style. As a representative of Creative Circle’s professional team, it is important you learn about their expectations and do your best to meet them. This applies to dress and grooming as well. Expectations for appropriate dress at client sites will be set by the client and you will need to comply. If you are unsure of what is expected in any aspect of your job responsibilities, dress, communication style, or behavior, please discuss this directly with your client supervisor. If you’re uncomfortable doing so, talk to the Recruiter who booked you on your assignment. He or she will be happy

to get answers to any questions you may have.

Attendance & Punctuality

You are expected to be on time and ready to work each day of your assignment and to work your entire scheduled shift. Tardiness and excessive absences reflect badly on you and Creative Circle. Please contact your client supervisor and your Recruiter if you know you will be late or absent.

Drugs & Alcohol

Creative Circle has a ‘zero tolerance’ policy regarding the manufacture, distribution, dispensing, use, possession and sale of illegal drugs, controlled substances (drugs listed in schedules I through V of Section 202 of the Federal Controlled Substances Act, 21 U.S.C. 5812), drug paraphernalia, alcohol and other illegal substances by our employees at a client site, while being paid for client-related work (even if at home), or while on Creative Circle premises. This supports our intent to provide a safe and healthy work environment, and provide the best possible service and product to our clients. An exception may be made for company or client sponsored events where alcoholic beverages are provided. On those occasions, we expect that employees would consume no more than a moderate amount of alcohol.

This policy does not prohibit the use of medications prescribed by a licensed physician or that are available over the counter, provided they do not impair your ability to perform your job duties or cause excessive absenteeism or tardiness. If these medications do cause negative job performance, we may want to discuss a leave of absence until the need for the medication has ended.

Maintaining A Violence-Free Workplace

Creative Circle is strongly committed to providing a safe workplace. For this reason, we expect and encourage you to exercise reasonable judgment in identifying and informing management about any situations or actions you're uncomfortable with, especially those you perceive to be potentially dangerous. Reports can be made anonymously. All reports will be promptly investigated and appropriate action will be taken if the investigation confirms that the threat of, or an act of violence has occurred. If you feel that a threat or act of violence will or has occurred please contact HumanResources@creativecircle.com with any information.

Additionally, we specifically discourage you from engaging in any verbal or physical confrontation that could escalate into violence. Threats, threatening language, or any other act of aggression or violence made toward or by an employee will not be tolerated. A 'threat' includes, but is not limited to, any verbal or physical harassment or abuse, blocking an individual's path, attempts to intimidate or to instill fear in others, menacing gestures, bringing weapons into the workplace, stalking, or any other hostile, aggressive, injurious and/ or destructive action taken for the purpose of domination or intimidation.

Company Property

You may have access to, or even be assigned, valuable property belonging to Creative Circle clients. Any such property is the sole and exclusive property of this client and shall be used for business purposes only. It is not for personal use under any circumstance. At the end of your assignment, you must immediately return any such property to the client, or to your Creative Circle office.

Any damage to the property caused by your negligence or misuse is your responsibility. Similarly, if you lose the equipment, or fail to return it in proper working order upon the completion of your assignment, you will be held responsible. You will be asked to reimburse the client for any repair or replacement costs.

Workplace Searches

Creative Circle and its clients reserve the right to search employee desks and work areas, backpacks, purses, briefcases, lunch bags or other personal items brought into work. This may occur with or without advance notice.

Use of Electronic Media

Creative Circle's clients use various forms of electronic communication including computers, email, voicemail, cellular phones, and the internet. All electronic communications, software, databases, hardware,

electronic storage media and digital files remain the sole property of the client and are to be used only for client business.

Everything that is stored on a computer or company/ client-owned storage medium belongs to the company or client. Our clients reserve the right to monitor voice and email messages, and to access and review electronic files, messages, mail and other digital archives in their possession without notice to Creative Circle or our employees assigned there. There should be no expectation of privacy.

Electronic media may not be used in any manner that is against Creative Circle's or the client's policies, is not in the best business interest of the client, or that would be discriminatory, harassing, or illegal. In all cases, it is inappropriate and illegal to access, download or store pornographic materials with either company or client computer resources.

You are not permitted to access other employees' electronic devices unless directed to do so by your client supervisor. Employees who engage in defamation, copyright or trademark infringement, misappropriation of trade secrets, or in other ways misuse electronic media will be removed from assignment, terminated from Creative Circle and may face legal action.

Confidentiality

While working on assignment, you may be entrusted with sensitive information of a confidential nature, including trade secrets. Trade secrets include but are not limited to sales figures or projections, estimates, customer lists, customer purchasing habits, computer processes, programs and codes, marketing methods and related data, tax records, personnel compensation, history or actions, or accounting procedures. Trade secrets shall be kept as the private and confidential records of the company and/or client, and you may use them only when performing work for the company and/ or client.

All client information obtained while on assignment is confidential and discretion should be used at all times. Even casual remarks may be misinterpreted and repeated, so develop the personal discipline necessary to maintain confidentiality. It may not be shared with anyone outside the organization without the express permission of your client supervisor. You may not misappropriate or divulge trade secrets, or other confidential information to any firm, individual or institution without the direct authorization of your client and Creative Circle supervisors, nor shall you discuss trade secret and confidential information with 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 you directly for the client, or as part of the project team you are 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. You must get

the client's permission before any of your work product created for that client (including drafts that are not used) or information about the client, its products or services, or your work with them is posted or published to any outside source, including your professional portfolio or personal social media sites.

Key Employment Policies

Equal Employment Opportunity (EEO) Policy

Creative Circle is committed to the principle of equal employment opportunity for all employees and to providing you with a work environment free of discrimination and harassment. All employment and placement decisions are based on client needs and decisions, job requirements, and individual skills and qualifications, without regard to race, color, religion (including religious dress and grooming practices), ancestry, national, social or ethnic origin, citizenship, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), age, physical, mental, sensory, and/or related disabilities, medical condition, HIV status, sexual orientation, gender, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, military or veteran status, family medical history or genetic information, family and medical leave status, family or parental status, or any other status protected by laws or regulations in the locations where we do business. This policy applies to all terms and conditions of employment including, but not limited to, hiring, placement, termination, leaves of absence, compensation, and training.

Discrimination & Harassment Policy

You have the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Creative Circle will not tolerate discrimination or harassment based on any of the characteristics listed in the EEO policy above. We require that all employees lend their support to achieving our objectives of equal opportunity employment with zero tolerance for any type of illegal harassment, discrimination or bullying. Prohibited harassment refers to any verbal, visual or physical harassment that is unwelcome or creates a hostile work environment.

Sexual harassment includes unwelcome sexual advances or familiarity, requests for sexual favors, and other verbal or physical conduct of a sexual nature when any one of the following factors is present:

- Submission to such conduct is an explicit or implicit term or condition of employment;
- Submission to or rejection of such conduct by an employee is the basis for an employment decision affecting that employee; or
- The conduct has the purpose or effect of substantially interfering with an employee's work performance or creates an intimidating, hostile or offensive work environment.

Sexual harassment is not limited to conduct motivated by sexual attraction. It may occur between members of the opposite sex or members of the same sex, regardless of their sexual orientation. It also includes offensive non-sexual conduct directed at an employee because of his or her gender.

Similar conduct, when based on other protected classes, may constitute harassment and therefore violate this policy. For example, racial jokes or degrading comments regarding age or religious background can constitute harassment under this policy. Such acts will not be tolerated.

Complaint Procedure

If you feel you have been harassed, discriminated against, or retaliated against for filing a complaint, by a client or Creative Circle employee, subcontractor, vendor, or any person you interact with while on a Creative Circle assignment, please notify the Recruiter who placed you on your assignment and the Creative Circle Human Resources department. You can also talk with your client supervisor or the client's Human Resources department if the issue is with someone you work with, or met, via your client assignment. But regardless of your communication with the client, Creative Circle needs to know so we can make sure it is properly investigated and appropriate action is taken. Creative Circle cannot always control the conduct of non-employees, but we will attempt to investigate and address any situations that arise, consistent with the intent of this policy and federal, state and local laws. We will take appropriate action to correct any incidences of discrimination or harassment found, or

work with our clients with this objective in mind.

The Equal Employment Opportunity Commission (EEOC) and equivalent state agencies will also accept and investigate charges of discrimination or harassment at no charge to the complaining party.

Retaliation is prohibited against any person for using this complaint procedure in good faith or for reporting harassment, or for filing, testifying, assisting, or participating in any investigation, proceeding or hearing conducted by a governmental agency. You can report incidents of harassment without fear of retaliation and we will make every effort to maintain confidentiality, unless doing so would prohibit us from conducting a thorough investigation. You will be notified if confidentiality cannot be maintained. If you feel you're being retaliated against, notify your Recruiter and a member of the Creative Circle Human Resources team. We will take all reports of harassment seriously and will work with our clients, as needed, to investigate the issue.

Disability Accommodations

It is our policy not to discriminate against individuals with disabilities in regards to application procedures, hiring, discharge, compensation, training or other terms, conditions and privileges of employment. The company will strive to comply with all laws concerning the employment of persons with disabilities and we will make every effort to accommodate candidates with disabilities during the interview process.

Once assigned at a job, we will work with clients to reasonably accommodate qualified individuals so that they can perform the essential functions of the job. However, there may be instances where providing the accommodation would create an undue hardship to the client or Creative Circle. In those cases, we will work collaboratively with our employee to identify alternative ways to accommodate the employee's disability with an aim towards helping the employee perform the work if possible.

If you require an accommodation to perform your job, contact your Recruiter or the Creative Circle Human Resources department so we can discuss your needs and ideas, and present them to our client.

Safety

Creative Circle is committed to providing a safe work environment at our own offices as well as at our client locations. Because safety is the responsibility of each employee, it is important that you follow basic safety guidelines while on assignment.

- Get to know your job including any associated hazards.
- Use good judgment and take reasonable precautions to ensure your safety and the safety of others.
- Follow all instructions, signs and warnings related to your job health and safety. Use common sense when operating any office equipment or machinery, and when lifting, climbing or carrying objects.
- Familiarize yourself with the client's safety procedures related to your job, evacuation procedures and the location of fire extinguishers, first aid supplies and emergency exits.
- Inform your client supervisor and Creative Circle Recruiter of any safety hazards or unsafe working conditions.
- Advise your client supervisor and Creative Circle's Human Resources department immediately if you are injured while on assignment. We are covered under statutory state worker's compensation laws and will ensure you get the proper care. We will also investigate the incident so that we can work with our clients to prevent similar incidences in the future.
- There's a link to our Worker's Compensation information on our candidate information page which has injury reporting instructions. It can be found at creativecircle.com/candidateinfo.

Employment Law

We want you to be informed about the laws and regulations that relate to your work location. Please visit <http://bit.ly/2dy9znP> and click on the state in which you will be working for a list of employment law postings that apply to you.