



The ODLE Way:

Opportunities for Growth

Dedicated to Those We Serve

Loyalty to a High Performing Workforce

Excellence in All We Do

POLICIES IN BRIEF – Pittsburgh Job Corps Center

EMPLOYMENT

REV 8.27.20

EMPLOYMENT AT-WILL

It is important to understand the employment relationship with the Company is “at-will.” This means that both the employee and the Company are free to end the employment relationship at any time, with or without prior written notice. This “at-will” relationship remains in effect throughout employment with Odle Management (ODLE). The Company will continue to have absolute power to end employment with or without cause.

EQUAL EMPLOYMENT OPPORTUNITY

ODLE provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.

This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

ANTI-HARASSMENT / NO RETALIATION

ODLE is committed to creating and sustaining a work environment in which each employee has the opportunity to grow, develop and contribute fully to our collective success. Harassment, discrimination, or intimidation of any employees based on race, color, national origin, religion, gender, age, disability, genetic information, sexual orientation, veteran or any other status protected by applicable federal, state or local law, regulation or ordinance is against Company policy. Employees found to have violated this policy may be subject to discipline, up to and including termination.

This policy extends beyond normal work hours and covers employee conduct at conferences, meetings, other events and electronic activity including social media. Please be advised that this policy applies to all employee conduct, regardless of intent.

This policy extends to prohibited harassment of an Odle employee by a manager, supervisor or employee. It also prohibits harassment by or towards a customer, consumer, client, supplier, vendor, or other business partner. Odle will promptly address all complaints rendered under this policy in a timely fashion and will take appropriate

disciplinary action, including separation, against those who violate this policy. The complaint process will remain confidential to the maximum extent possible.

Odle strictly prohibits any form of retaliation against an employee who in good faith makes a complaint, raises a concern, provides information or otherwise assists in an investigation or proceeding regarding any conduct that he or she reasonably believes to be in violation of our **Harassment, Discrimination, and Retaliation Policy**. This policy is designed to ensure that all employees feel comfortable speaking up when they see or suspect illegal or unethical conduct without fear of retaliation. It is also intended to encourage all employees to cooperate with Odle in the internal investigation of any matter by providing honest, truthful and complete information without fear of retaliation.

AMERICAN'S WITH DISABILITIES ACT (ADA)

It is the policy of ODLE to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to Odle and our clients.

Contact the Human Resource department with any questions or requests for accommodation. See **Accommodation Policy** for further information.

RELIGIOUS BELIEFS OR PRACTICES

ODLE is committed to complying with Title VII of the Civil Rights Act of 1964 (Title VII), which prohibits discrimination against employees or applicants for employment because of their religious beliefs in hiring, firing and other terms and conditions of employment.

Employees and job applicants may contact Human Resources with any questions of requests of accommodation. See **Accommodation Policy** for further information.

CONFLICT RESOLUTION / EMPLOYEE PROBLEM SOLVING

To foster sound employee-employer relations through communication and reconciliation of work-related problems, ODLE provides employees with an established procedure for expressing employment related concerns. In these situations, the following steps should be taken:

- The employee is encouraged to first attempt to resolve the issue(s) through discussions with his/her immediate supervisor allowing reasonable time for a response, or proposed resolution, barring extenuating circumstances such as vacation, illness or business travel.
- If the employee is not satisfied with the proposed resolution from his/her supervisor, he or she may continue up the chain of command to the Department Manager/Director and Corporate Human Resources who will

conduct his/her own fact finding, review the findings and also the determination previously made, and arrive at a conclusion.

- If there is a situation where an employee feels that direct communication with his/her immediate supervisor or the Department Manager/Director is not feasible because of the sensitivity of the issue, it is recommended that the employee deal directly with the next level of command or Corporate Human Resources.

EMPLOYEE PROBLEM SOLVING

See COP 5.2R3a (2) for additional information.

GRIEVANCE PROCEDURE

ODLE recognizes that there are times when the need arises for employees to express concerns or complaints in a formal manner. The following procedures will ensure that employees receive a fair and unbiased review of workplace concerns.

If the grievance is with the employee's immediate supervisor, another member of management can be substituted to assist in the grievance process.

Step 1: Informal discussion with supervisor

Employee concerns should first be discussed with the employee's immediate supervisor. Many concerns can be resolved informally when an employee and supervisor take time to review the concern and discuss options to address the issue.

Step 2: Written complaint to supervisor

If the employee is not satisfied with the results of the informal discussion in Step 1, the employee may submit a written complaint within five days to his or her immediate supervisor.

The immediate supervisor working with the EO Coordinator (HR Manager) will endeavor to resolve the issues of the complaint. If the EO Coordinator cannot resolve the issues of the complaint within ten (10) working days, a hearing may be requested.

If the employee complaint is regarding harassment, discrimination or retaliation, the employee should submit the written complaint directly to Human Resources.

Step 3: Request for Hearing to EO Committee

If the employee is not satisfied with the response from the immediate supervisor, the employee shall be offered an opportunity to request an impartial hearing before the EO Committee.

A hearing, when requested, shall normally be held within 30 days after the filing of a complaint. A recommended decision by the EO Committee to the Odle Management President will be made within 50 days of the filing of the complaint, and a final written decision by the President and Corporate HR Director will be made within 60 days of the filing of the complaint.

The EO Committee will consult with the employee's immediate supervisor, Human Resources and any other relevant parties to evaluate the grievance and provide a written response to the employee. The outcome of the review by the EO Committee will

be final unless new evidence or other circumstances warrant additional review of the complaint.

Reference Grievance Policy, local COP and local HR for Affirmative Action Plan.

INITIAL REVIEW PERIOD

Every new employee goes through an initial period of adjustment in order to learn about the Company and about his/her job. During this time the employee will have an opportunity to find out if he/she is suited to, and likes, his/her new position.

In addition, the initial review period gives the employee's supervisor a reasonable period to evaluate his/her performance. The initial review period begins from the first day of employment through the first six months of employment.

During this time, the new employee will be provided with training and guidance from his/her supervisor. He/she may be terminated at any time during this period if his/her supervisor concludes that he/she is not progressing or performing satisfactorily. Under appropriate circumstances, the initial review period may be extended with prior approval from Center Human Resources Manager and Corporate Human Resources. However, an employee's employment with ODLE Management is not for any specific time and may be terminated at will, with or without cause and without prior notice.

During the initial review period, the employee and his/her supervisor will discuss performance issues. Depending on the outcome of this performance review, the employee may be recommended for an adjustment to rate of pay; performance goals; rate of incentive bonus, if applicable; an extension of the initial review period; and/or that he/she may continue in our employment as an at-will employee.

EMPLOYEE PERFORMANCE APPRAISALS

You will may be evaluated after six months of employment, annually as well as periodically throughout the year. Annual appraisals are completed at Contract Year end each year. Based on the result of this performance review, the employee may be recommended for an adjustment to rate of pay; performance goals; rate of incentive bonus, if applicable.

ATTENDANCE POLICY

Attendance and timeliness are crucial factors in the daily and overall operation of Odle. Frequent or chronic patters of unplanned absences or tardiness undermine the health and success of our business and constitute unprofessional work conduct. The standards stated below are provided for employees with the intent of establishing standards that are workable for both employees and Odle's business needs.

Work Day: All employees are required to work their scheduled shift unless they have pre-approved sick or vacation time for all or part of their shift. Exempt employees are required to work their full 8-hour shift (not including their lunch time).

Absences: If you are unable to work your scheduled shift, you should contact your manager at least one hour prior to the start time of your shift. Failure to notify your manager of your absence is considered a "no call/no show".

A no call, no show without a valid reason may be cause for termination.

Absenteeism which occurs due to true emergency situations will be reviewed on a case by case basis.

PERSONAL APPEARANCE

All employees should wear clothing that is appropriate to the professional standards of their positions. Such clothing should not be provocative or distracting and must be clean and well-kept at all times. An employee is expected to be appropriately dressed according to good business practices. Careful grooming, personal cleanliness and neatness must be given full consideration by each employee.

Some examples of inappropriate attire include: clothing with slogans; athletic/beach/aerobic wear such as halter tops, t-shirts, sweatpants, flip flops, exercise outfits, leggings*/jeggings and footwear; tight, revealing or transparent fabric without appropriate undergarments; shorts or short skirts/dresses more than 3 inches above the knee; and denim Jeans in any color. *Some of our contracts are located in regions with extreme cold/wind-chill factors in the wintertime, and therefore, leggings (not jeggings) may be worn during the winter months.

All employees should have their hair clean, neat, and well groomed at all times. Male staff members will be allowed to wear beards and mustaches that should be neatly trimmed. There are to be no fluorescent or poster-pain hair colors among staff. If coloring is used in hair, it is to be a shade or color that is natural to humans. Jewelry should be kept to a minimum and in no way hamper the function or safety of the workplace. Tattoos and body piercing (other than earrings) should not be visible.

For management/Office Personnel – Business Casual attire is expected. For more specific guidance reference your center C.O.P.

DISCIPLINE

In the course of your employment with ODLE and in order to provide the best possible work environment, Odle expects you to act in a respectful manner, to follow instructions from your supervisor, and to comply with Company policies, practices, and procedures regarding performance and conduct that will protect the interests and safety of all employees, customers, and guests of the Company.

Odle may use progressive discipline, depending on the offense, to include Verbal Counseling in written form; Written Counseling, Final Written Counseling and termination.

This Corrective Action Plan applies to all employees. This policy pertains to matters of conduct as well as the employee's job performance and competence. **An employee who violates Odle's rules of conduct and/or does not display satisfactory performance and accomplishment on the job may be discharged immediately and without resort to the steps set forth in this policy depending on the seriousness of the violation or level of unacceptable performance.**

For more information, see Odle's Discipline Policy, Standards of Conduct, and Center's COP.

SEPARATION OF EMPLOYMENT

While we hope that your employment with Odle will be a fulfilling experience, we understand that there will be situations that occur that will result in change of employment.

- **Resignation:** Resigning employees are encouraged to provide two weeks' notice, preferably in writing, to facilitate a smooth transition out of the organization. Management reserves the right to provide you with two weeks' pay in lieu of your notice in situations where job or business needs warrant such action. If you provide less notice than requested, the employer may deem you to be ineligible for rehire depending on the circumstances regarding the notice given.
- **Retirement:** Employees who wish to retire are required to notify their department manager and the Human Resources department in writing at least one (1) month before the planned retirement date.
- **Job abandonment:** Employees who are no call/no show for three (3) consecutive workdays shall be considered to have abandoned the job without notice. This will be considered a voluntary termination. Employees who are separated due to job abandonment are not eligible for rehire.
- **Termination:** As an "at-will" employer, Olde retains the right to terminate an employee at any time with or without cause.
- **Final Paycheck:** Your final paycheck for hours worked may be a direct deposit (if set up); if separation is management directed, you will receive a live check, or it may be mailed to your address on file.
- **Vacation Hours:** Generally, the payout of vacation hours will be processed with your final check, or the pay period following your separation date. It can be a direct deposit, or a live check mailed to your address on file.
- **Reimbursement to Company:** In some cases, the value of a vacation balance payout may be reduced to cover all or a portion of the employee's share of a contribution (e.g. insurance premiums).

REHIRING FORMER EMPLOYEES

Former employees who left Odle in good standing and were classified as eligible for rehire may be considered for reemployment. The hiring manager must obtain written approval from Human Resources prior to rehiring a former employee.

Rehired employees begin benefits just as any other new employee. Previous tenure will not be considered in calculating longevity, leave accruals or any other benefits unless rehired within one year of separation. An applicant or employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

DRUG FREE WORKPLACE

ODLE believes that it is important to promote a drug-free community, to maintain safe, health, and efficient operations, and to protect the safety and security of the employees, facilities, and property of Olde. Being under the influence of drugs or alcohol on the job may pose serious safety and health risks to the user and all those who work with the user. In addition, the use, possession, sale, transfer, manufacture, distributions, and

dispensation of alcohol or illegal drugs in the workplace pose unacceptable risks to the maintenance of a safe and healthy workplace.

Substance abuse, while at work or otherwise, seriously endangers the safety of employees, as well as the general public, and creates a variety of workplace problems, including increased injuries on the job, increased absenteeism, increased health care and benefit costs, increased theft, decreased morale, decreased productivity, and a decline in the quality of services provided by Olde.

An employee observed by management and deemed to be under the influence of alcohol or drugs during business hours will be removed immediately from the premises. Their employment with Olde may be terminated.

BACKGROUND CHECKS

If we are unable to verify information provided by the employee as it relates to dates and degrees conferred, the responsibility to provide an official document such as a diploma or transcript showing the date and degree conferred shall be relegated to the employee. As such, the employee will have 90 days from date of hire to provide an official transcript or official diploma to Corporate Human Resources verifying the information provided on his/her employment application.

Background checks will be conducted every three years, based on Contract Year End, to include drug testing.

VALID DRIVER'S LICENSE AND AUTO INSURANCE CARD

New staff must provide a copy of their valid driver's license and a copy of their current automobile insurance card with visible dates of coverage and expiration representing the state in which they are working for ODLE, to be allowed to park on center or be allowed to drive any center vehicle. In addition, staff will provide a copy of their valid drivers' license and current automobile insurance card annually. Should changes occur to an employee's valid drivers' license and/or automobile insurance card, they must notify center HR and provide copies of updated items.

If a new employee does not have a drivers' license in the state in which they are employed, the employee will have 30 days to obtain the new drivers' license. Failure to comply may result in disciplinary action, up to, and including termination.

If a new or current employee does not have a car, and therefore, carpools or takes public transportation, then a State Identification Card will be acceptable.

Olde Management is not responsible for accidents or vandalism to personal or rental vehicles driven by employees while on company business, driving on roads within or parking at a Job Corps center or to/from a Job Corps Center (e.g., traffic accidents, incidents of vandalism in the office or other facility parking lot, etc.).

EMPLOYEE CLASSIFICATIONS

All employees are designated as either nonexempt or exempt under state and federal wage and hour laws. The following is intended to help you understand employment classifications and employees' employment status and benefit eligibility.

Non-exempt Employees are eligible for overtime pay when working over 40 hours in a pay week excluding holidays or Paid Time Off (PTO). Non-exempt employees are normally paid on an hourly basis.

Exempt Employees are not eligible for overtime pay when working more than 40 hours in a pay week. Exempt employees are normally paid a salary.

Full Time Employees are scheduled to work a minimum of 30 hours a week on a consistent basis.

Part-time Employees are scheduled work 20-29 hours in a week or less on a consistent basis.

On-Call Employees are scheduled work up to 20 hours in a week or less on a consistent basis.

Temporary employees are hired for a specific, limited period of time or to complete a specific project.

BENEFITS – TYPES OF LEAVE (VACATION, SICK, HOLIDAY, BEREAVEMENT, ETC.)

EMPLOYEE HEALTH BENEFITS

ODLE provides health benefits to regular full-time employees. The plan year runs from January 1st through December 31st. For specifics about the benefit plans, please contact Human Resources.

Regular full-time employees are eligible for health benefits on the 1st day of the month following 30 days of employment.

You will be required to enroll initially and during our annual Open Enrollment, via the ADP portal, accessing “My Enrollments”. You will be prompted by an enrollment window each time you log into ADP within the first 30 days of employment or Open Enrollment.

If you elect or decline coverage when you are eligible, you will not be able to change your decision until the open enrollment period of the next plan year. The exception to this is when you have what is considered a “qualifying life event”.

Qualifying life events include:

- Marriage, civil union, divorce, annulment, legal separation.
- Birth, adoption, taking in a foster child, or becoming a legal guardian.
- Change in spouse’s work status.
- Death of spouse or dependent.
- Change in status of dependent’s eligibility (e.g. change of student status or becoming too old for coverage).

Open enrollment period will occur prior to January 1 of each year.

VACATION

Time away from work to relax and pursue special interests is important to everyone. A regular full-time or part-time employee will accrue vacation hours from the first day of

hire, however, **paid vacation time will not be available to employees until AFTER 90 days of employment or 90 days in eligible status.** The only exception to this rule is when employees are hired from a predecessor contractor during an ODLE Management transition period and whose first day of employment is also the start date of the ODLE contract, these employees will not be subject to the 90-day waiting period. However, if these transitioned employees have not accrued any vacation and/or sick leave hours their time off will be unpaid.

Regular, full-time employees will typically earn up to ten (10) vacation days annually (unless covered by the Service Contract Act) which will be pro-rated if due to start date, the employee worked less than 12 months in a calendar year.

Part-time employees who are hired to work at least 20 hours a week will enjoy a prorated number of days per year depending on number of hours worked.

New hire employees will accrue vacation at the rate of 3.08 hours per pay period unless they were hired by Odle Management after the previous contract ended or are part-time employees. If applicable to the contract, eligible employees hired from the previous contractor or a different contractor immediately preceding employment with Odle Management will have their service as it regards to vacation accrual grandfathered based on their overall years of service with the previous contractor. Please note, however, that accrual methods vary from employer to employer; therefore, the accrual rate will be subject to review and realignment with ODLE's policy. The Service Contract Act of 1965 and any amendments to date covers service employees who perform the actual services of the contract.

Should an employee leave ODLE's employment prior to the completion of 90 days in an eligible status, employees will not be entitled to a pro rata payment of accrued, unused vacation hours at the time of separation, unless stipulated by state law.

The following is a schedule of possible vacation accruals:

<u>Years of Service</u>	<u>Amount of Vacation</u>	<u>Vacation Accrual Rate</u>
1 to 5 years	2 weeks or 10 days	3.08 hours per pay period
6 to 10 years	3 weeks or 15 days	4.62 hours per pay period
11 or more years	4 weeks or 20 days	6.15 hours per pay period

ODLE's vacation carryover policy allows for an eligible employee to carry no more than 160 hours in any given year. Please be advised that if vacation time is not taken and the threshold of 160 hours has been met, the employee will forfeit earning additional vacation hours until vacation time is taken.

Employees should submit their vacation requests as far in advance as possible, with at least a minimum of **two weeks' advance notice.** Vacation requests submitted with less than a two-week notice will be subject to the manager's discretion. Based on business conditions, ODLE will attempt to grant employees the vacation days he/she requests.

Please be advised that a Request for Time Off must be entered ADP in advance, as noted above, and approved by the manager prior to taking the time off. Moreover, accrued/available vacation hours **MUST** be used first prior to taking unpaid time off.

When a Company holiday falls during a scheduled vacation, it is not counted as a vacation day. For purposes of holiday pay, if an employee is on a scheduled vacation the day before a Company holiday and/or the day after the holiday, the employee will receive holiday pay.

Any employee that becomes ill during a scheduled vacation cannot change a vacation day to a sick day; scheduled vacation days are counted as vacation even if an employee would ordinarily take a sick day.

SICK LEAVE

A regular full-time employee will earn sick time from date of hire up to a maximum of 10 days (3.08 hours per pay period) per calendar year; time will be prorated if employee has worked less than 12 months in a calendar year or if the employee is part-time hired to work at least 30 hours per week. Sick time may be used for a personal non-job-related illness or injury to go to the doctor or dentist, to take a sick child or debilitated adult family member to the doctor or dentist.

Part-time and On-Call/Substitute employees who are hired to work less than 30 hours per week will accrue a minimum of one (1) hour of earned paid sick time for every 35 hours worked.

Paid sick time will not be available until after 90 days of employment. Since sick leave benefits are also intended to provide income protection in the event of actual prolonged illness or injury, employees may carryover up to 80 hours of sick time in any given year; however, once the 80-hour threshold is reached in any given year, accrual will cease until sick time is utilized. Employees will not be paid for unused sick days at the end of the calendar year nor upon separation of employment unless otherwise stipulated by state law.

To be eligible for sick pay, employees unable to report to work due to illness must telephone their supervisor directly, each day of their absence, as far in advance as possible, but no later than one hour before their scheduled arrival time. If their supervisor is not available, then their Manager/Director should be contacted and/or contact Center Human Resources. An employee who fails to contact either his/her supervisor, their Manager/Director or Center Human Resources **following three consecutive working days without notice is considered to have abandoned his/her job and will be considered as having voluntarily resigned.**

Leaving a voicemail or text message is NOT considered "contact" with the appropriate supervisor, Manager/Director or Center Human Resources; you must speak directly with the appropriate person in authority. If at the time of the absence you are unable to speak on your own behalf due to an accident, serious illness or hospitalization, a family member, friend or your personal physician may call on your behalf. Upon return to work, you must bring in a doctor's note authenticating the absence and provide this to your supervisor/manager and to Center Human Resources.

If you are absent **more than three days on sick leave**, you must submit a doctor's release to return to work to your supervisor/manager for their review and signature, and this physician's return to work release must be sent to Human Resources. In addition, this sick leave/time off must be recorded in ADP immediately.

Exempt employees who arrive at work and leave prior to working **six (6) hours** per given scheduled workday will have available sick time hours or vacation hours debited accordingly. This action allows the integrity of their designation as Exempt/Salaried to remain intact because they will still receive their full salary for the day.

If you are sick and have exhausted your sick time hours, you must use your available vacation hours PRIOR to utilizing unpaid time off.

UNPAID TIME OFF OR LEAVE WITHOUT PAY

During the 90-day waiting period during which an employee is accruing vacation and/or sick time hours depending on their eligibility status, employees may use unpaid time off in lieu of vacation or sick time hours. After the 90-day waiting period, however, employees must use accrued sick time hours if they are sick and/or vacation time if they have used all their sick time hours. In addition, if an employee has used all their vacation hours, they cannot use sick time hours to go on vacation or to extend their vacation. If an employee exhausts their accrued sick time AND vacation hours, then upon approval the employee may use unpaid time off or Leave without pay.

HOLIDAYS

All regular, full-time and part-time employees (including those in the initial review period) are eligible for UP TO 10 paid holidays per year and include the following:

New Year's Day	Labor Day
Dr. Martin Luther King, Jr. Day	Veteran's Day
President's Day	Thanksgiving Day
Memorial Day	Day after Thanksgiving Day
Independence Day	Christmas Day

Prior to the end of each year, the holiday schedule for the coming year will be announced and posted at each ODLE facility. Should a holiday fall on a weekend, it will be observed on either the preceding Friday or following Monday.

Part-time employees will only be eligible for those holidays that fall during their regular work schedule. In addition, part-time employees working less than 8 hours per day will receive the same number of hours of holiday pay as their regularly scheduled workday (e.g., normal part-time work hours equal 5 per day, then the holiday hours paid will be 5 hours).

Please Note: Employees must be at work or on approved paid vacation time the business day before and the business day after the holiday in order to qualify for holiday pay. However, we understand there will be times that unforeseeable circumstances will require staff to take the time off prior to a holiday with limited notification to their direct supervisor or manager. This can be accommodated provided the notification of absence was approved by the direct supervisor or manager prior to taking the time off. The proof of approval must be entered in ADP, via email or if unable to do either, then a statement from the approving supervisor or manager, must be sent to Center Human Resources immediately following the holiday and as required, Center HR will send a copy to the Corporate Payroll Supervisor.

Approving Managers must not wait to approve in ADP and/or send their approvals via email until the end of the payroll cycle. Please be advised these types of last-minute leaves and approvals must NOT be the norm. In addition, these types of leaves will be reviewed by management on a case-by-case basis.

If an employee does not have any available vacation time and receives approval to take unpaid time off, this action does not qualify for holiday pay. Holiday pay will also NOT be paid if an employee is sick the day before and/or the day after a holiday. **However**, holiday pay will be paid for pre-approved sick time (e.g., leave of absence due to hospitalization inpatient and outpatient surgery and recovery period following surgery). A medical release authorizing the employee to return to work will be required.

Non-exempt employees who have been requested to work on a company observed holiday who arrive at work and work the full day will receive their regular pay plus holiday pay. If they become ill and leave work early, they will be paid for hours worked plus holiday pay. Prior to leaving work, they must notify their direct supervisor/manager or Human Resources and time off must be entered ADP.

Exempt employees whose regular scheduled workday is a company-observed holiday will be entitled to holiday pay in addition to the day off. If the employee is requested to work on an observed holiday, the employee will be entitled to a paid day off within the next pay period. Employees must notify their direct supervisor or manager in advance of the subsequent day they have chosen to replace the company holiday and must receive approval from their direct supervisor or manager prior to taking the day off.

BEREAVEMENT

It is ODLE's intention to support employees during this time of grief and bereavement.

In the unfortunate event of the loss of a loved one in the immediate family, employees will be granted a paid leave of absence of UP TO three (3) consecutive working days. You will receive your standard wage or salary as bereavement pay. If extenuating circumstances exist that will require additional time off, accrued and available vacation leave must be utilized prior to leave without pay.

Immediate family is defined as the employee's spouse, domestic partner, child, stepchild, parent, stepparent, father-in-law, mother, mother-in-law, son-in-law, daughter-in-law, brother, sister, stepbrother, stepsister, or an adult who stood in loco parentis to the employee during childhood.

Employees are allowed (1) one day off from regular scheduled duty with regular pay in the event of death of the employee's brother-in-law, sister-in-law, aunt, uncle, grandparent, grandchild or spouse's grandparent.

Please be advised that we will require verification of the need for bereavement leave. Documentation must be given to your direct supervisor/manager and provided to Human Resources.

We understand the deep impact that the loss of a loved one can have on an individual or family, therefore additional non-paid time off may be granted depending on the circumstances. Individual employee circumstances may be discussed with the

employee's supervisor/manager and Human Resources to determine whether additional considerations are needed.

Employees should inform their direct supervisor or manager and Center Human Resources of their situation by completing a Leave of Absence form with the requested information and must also enter time off requested into ADP as Bereavement Leave for review and approval by their direct supervisor or manager and Center Human Resources prior to the actual start date/time of the requested leave.

PUBLIC SERVICE LEAVE

Employee must provide proof of summons when called for Jury Duty, Witness Duty or as a Defendant in a court case in addition to completing a Leave of Absence form. Odle Management requests employees to deposit the check received from the Court for Jury or Witness Duty and submit a personal check to Odle Management in the same amount received for Jury or Witness Duty in exchange for receiving regular wages equivalent to the employee's set number of work hours or up to an 8-hour day, up to a maximum of five (5) business days.

If additional time off is needed due to length of court case beyond five (5) business days, the employee must notify their direct supervisor/manager and Human Resources as soon as the employee is notified by the court. This will allow ODLE Management to review the special circumstances and, to the extent possible, render assistance to the employee.

An employee on jury or witness duty is expected to return to work on any day he/she is excused from such duty.

TIME OFF TO VOTE

If the polls are not open at least two hours before or after the work shift, employees may take up to a maximum of two hours off to vote in any local, state, or federal election or primary. The employee must give his/her supervisor reasonable notice that time off is needed to vote, and the employer may choose any two hours during which the polls are open. Though most state laws do not require employers to pay employees for this time off, ODLE employees may charge this time to available sick leave on their time sheet.

UNIFORMED SERVICES EMPLOYMENT & REEMPLOYMENT RIGHTS ACT OF 1994, AS AMENDED (USERRA)

Under certain circumstances, employees are entitled to take unpaid time off to serve in the U.S. armed forces or, as amended and effective January 18, 2006, certain services such as the National Disaster Medical System, and to be reinstated to their former position, or a position of like seniority, status, and pay, upon completion of service.

For further details including more information on reemployment rights, continuation of health benefits while on military leave or reinstatement in the company health plan upon reemployment generally without a waiting period or exclusions, and discrimination or retaliation, please refer to "Your Rights Under USERRA" – Uniformed Services Employment and Reemployment Rights Act. For more information, you can view the Federal Poster at <http://www.dol.gov/vets/programs/userra/poster.htm> and it is also posted at the Center and in Center Human Resources. The Act defines in detail eligibility to be reemployed following voluntary or involuntary leave to undertake military

service or certain types of other service, and therefore, may entitle an employee to the protections of the law. Please feel welcome to contact your Supervisor/Manager or Human Resources for more information.

FAMILY AND MEDICAL LEAVE ACT (FMLA)

The Family and Medical Leave Act provides certain employees with up to 12 weeks of unpaid, job-protected leave per year. It also requires that group healthcare benefits be maintained during the leave.

ODLE Management helps employees balance their work and family responsibilities by allowing employees to take reasonable unpaid leave for certain family and medical reasons. We will provide eligible employees with up to 12 weeks of unpaid leave each year for any of the following reasons:

- Birth and care of a newborn child of an employee;
- Placement with the employee of a child for adoption or foster care;
- To care for an immediate family member (i.e., spouse, child, or parent) with a serious health condition; or
- To take medical leave when the employee is unable to work because of a serious health condition.

Employees are eligible for leave if they have worked for their employer at least 12 months, at least 1,250 hours over the past 12 months, and work at a location where the company employs 50 or more employees within 75 miles. Whether an employee has worked the minimum 1,250 hours of service is determined according to FLSA principles for determining compensable hours of work.

Time taken off due to pregnancy complications will be counted against the 12 weeks of family and medical leave.

Military family leave provisions afford FMLA protections specific to the needs of military families. For more information on the Military family leave provisions, please contact Center Human Resources or you may also contact Corporate Human Resources at the same telephone number provided in the paragraph below.

To discuss the provisions of FMLA or any questions that you may have, and/or request required forms to apply/complete for FMLA coverage, please contact Center Human Resources or you may contact Corporate Human Resources at (480) 922-1027.

LEAVE OF ABSENCE

Should a situation arise that temporarily prevents an employee from working, such as a temporary disability (includes pregnancy or a serious health condition) or family emergency, the employee may be eligible for a Leave of Absence with or without pay. Requested leave by employees who have been employed for less than six months will be reviewed on a case-by-case basis.

Under the tenants of the federal Pregnancy Discrimination Act (PDA), Odle Management Group will treat women affected by pregnancy and its related conditions in the same manner as they would any other employee with a temporary disability for insurance and other employee benefit purposes.

Any request for a leave of absence must be submitted in writing via the ODLE Leave of Absence form as far in advance as possible, preferably a minimum of two weeks' notice, and it will be reviewed on a case-by-case basis by the employee's supervisor, Manager and Human Resources. The decision to approve or disapprove is based on the circumstances; the length of time requested; the employee's job performance, attendance and punctuality record; the reasons for the leave; and business conditions.

Although the expectation is that the employee will return to work after the LOA expires, ODLE cannot guarantee that an employee's job will remain available or that a comparable position will exist when return from an unpaid leave is sought. The company will attempt to reinstate the employee to his/her former position or to one with similar responsibilities. If the position or a similar position is not available, the employee will be separated from employment.

MATERNITY LEAVE

An employee who is disabled from working because of pregnancy, childbirth, or related medical conditions, and is not otherwise eligible for FMLA leave, shall be granted, upon request, a leave of absence up to 12 weeks as medically necessary during the period of disability. Such leave may consist of leave without pay and/or paid leave such as accrued, available sick leave, vacation and voluntary short-term disability coverage currently in force.

Whenever possible, an employee shall provide at least 30 days advance notice by completing a Leave of Absence request form and providing notice from the physician as to the approximate length of leave as deemed medically necessary. If 30 days notice is not practical because of a medical emergency, for example, notice shall be given as soon as practical.

At the conclusion of the leave, subject to some exceptions, an employee will typically be reinstated to the same position or an equivalent position provided that the employee returns to work within the approved length of absence and immediately following termination of the maternity disability leave. A Return to Work certification from the doctor releasing the employee to work may be required.

An eligible employee may continue group health plan coverage and any voluntary coverage such as short-term disability or life insurance under the terms in existence prior to the leave. For more information about continuation of benefits while on leave, please contact Center Human Resources.

VOLUNTARY GROUP SHORT –TERM (STD) AND LONG-TERM DISABILITY (LTD)

Employees may elect voluntary short –term and/or long-term disability coverage either on the first day of a new contract or as a new hire after the first day of a new contract, meeting the 30 days and first of the following month benefits eligibility period. **Subject to a 14-day elimination period for STD and 90 days for LTD**, employees may choose

to utilize available sick time hours and then available vacation hours for wage continuity prior to the start of the partially paid disability period.

Please be aware that there is a “pre-existing conditions” exclusion clause associated with coverage. **A pre-existing condition means a sickness (includes pregnancy) or injury for which you have received treatment within the past 3 months prior to your effective date of coverage and covered under the STD plan for 6 months and/or the LTD plan for 12 months.** The total of all benefits received from this policy and your employer’s sick pay plan may not exceed 100% of your income prior to disability.

CONTINUATION OF HEALTH PLAN COVERAGE

An eligible employee may continue group health plan coverage and any voluntary coverage such as short-term disability or life insurance under the terms in existence prior to the leave. For more information about continuation of benefits while on leave, please contact Corporate Human Resources.

EMPLOYEE ASSISTANCE PROGRAM (EAP)

The EAP program is a confidential resource available to assist employees and their family members with short-term problem resolution. If you need help with relationships, financial challenges or other issues – big or small – the EAP program is here to help. This is a FREE program through Cigna Behavioral Health and of special note, you do not have to be enrolled in Cigna to utilize the programs offered. If you are in need of assistance, please contact Corporate HR for a descriptive brochure and important contact information.

GIFT OF TIME

The Gift of Time program is an employee assistance program established to enable employees to help one another in times of need. The gift provides assistance to employees who are unable to work and have no available leave hours to cover the absence.

All full-time regular employees that have satisfied 90 days of continuous employment are eligible to receive Gift of Time hours for absences without pay. Employees can donate either vacation or sick time in four (4) hour increments but must leave a balance in their vacation or sick account of forty (40) hours.

To received donated hours, employees must have exhausted all paid leave time before any donated hours are awarded.

For more information on the Administration of the Gift of Time, please see Gift of Time Policy.

YOUR PAYCHECK

Please be advised that upon receipt of your first several paychecks (and periodically thereafter, especially if you have made changes) it is strongly encouraged that you closely review the paychecks to ensure accuracy. It is recommended that you review rate of pay, vacation accrual, benefits selected, taxes, etc., and if an error is found, please contact Center Human Resources so that any errors can be corrected immediately.

OVERTIME

Sometimes you may be required to work extra hours that will result in working more than 40 hours in a regular pay week. Holidays, Jury Duty, Bereavement and PTO do not count towards overtime hours in a pay week.

Non-exempt/hourly employees:

All overtime must be approved by your manager prior to working the extra hours. Failure to receive approval for overtime worked or failure to report actual hours worked may result in disciplinary action. **It is important that you report all hours worked. It is unlawful to perform work duties but not report them as hours worked.**

Hourly employees should not access job-related e-mails or conduct other business outside of work hours.

Exempt employees:

As an exempt employee, you are expected to work whatever hours are necessary to meet your responsibilities. You will not be paid for extra hours that are required.

Comp Time:

Comp time cannot be given in place of paying overtime to hourly or to exempt employees

HOURS OF WORK

Observed office hours are typically from 8:00 am to 5:00 pm, Monday through Friday with the exception of company recognized holidays; however, actual start and end times may vary from contract to contract (e.g., 7:30 am to 4:30 pm) and are established by the Department Manager/Director AND Center Director and/or Corporate Human Resources.

Employees are required to clock in and out utilizing ADP timeclock while on shift at the center. At no time will an employee clock out after they have left the center. Doing so may lead to corrective action up to including termination of employment.

Each employee is to:

- Maintain an accurate daily record of his or her time for hours worked. All absences from work schedules should be pre-approved and appropriately recorded. Entries should be made daily.
- Obtain approval for any overtime worked within the workweek.

Each manager is responsible for:

- Ensuring that all employees maintain accurate time records and missed punches are corrected daily.
- Providing approval for overtime.
- Approving time off requests in a timely manner.

MEAL PERIODS AND BREAKS

In consideration of the well-being and productivity of its employees, ODLE requires that hourly employees working four or more consecutive hours will take an *unpaid* meal period of at least thirty minutes. An hourly employee scheduled to work seven or more consecutive hours is required to take an *unpaid* meal period of one hour. During unpaid meal periods, hourly employees are relieved from work duties and, therefore, must NOT

take their meals at their desks. As a rule, supervisors will not allow hourly staff members to skip or unduly postpone meal periods, nor will hourly staff members be allowed to compensate for late arrival or early departure by working through their meal period.

In addition, hourly employees should take a paid 10-minute break within each four-hour period. However, hourly employees may not use this 10-minute break to make up for arriving late or leaving early nor are they allowed to add it to their lunch hour.

Salaried staff members are also required to take an unpaid one-hour meal period; however, since salaried staff members schedules are typically more flexible, scheduling of the meal period may occur while working in the field or while working in the office.

SAFETY

ODLE feels that accident prevention is the responsibility of every employee and a primary objective of management.

It is the policy of Odle to utilize all appropriate safety practices and equipment available and to prevent any accident or injury to people or property associated with Odle or its clients. We will conform to any and all OSHA requirements.

As our employee, you are expected to follow safe work practices and to take an active interest by participating in our accident prevention program.

Cell phone use: Cell phone use while driving on center or while driving a company vehicle is strictly prohibited. If texting on center, it should be conducted in stationary, non-mobile position to avoid slips, trips, and falls.

WORKER'S COMPENSATION

At the time of the accident or injury immediately contact your immediate supervisor and fill out an Accident/Incident Form. **If needed, please seek medical attention immediately.**

Accidents involving the employee's personal injury must be reported to Human Resources for Worker's Compensation purposes. Failing to report an accident or injury may result in disciplinary action, up to and including termination of employment.

SMOKE AND VAPE FREE WORKPLACE POLICY

Smoking (traditional tobacco products) and Vaping (electronic nicotine delivery systems or electronic smoking devices) are prohibited in all enclosed areas within this worksite without exception. This includes common work areas, auditoriums, classrooms, workshops, conference and meeting rooms, private offices, elevators, hallways, medical facilities, cafeterias, employee lounges, restrooms, stairs, employer owned, GSA or leased vehicles, and all other enclosed facilities.

INCLEMENT WEATHER/EMERGENCY PROCEDURE

Odle Management facilities are always officially open during normal business hours. If hazardous weather conditions occur during business hours, the Center Director and Corporate office will decide early closing based on the city/state's declaration of a school closing and/or public emergency announcement. If it is decided that an ODLE facility will close early, the employees will be paid for their normal scheduled hours.

Generally, all employees are expected to report to work unless major thoroughfares have been closed due to extreme weather such as hurricane, flooding, tornado, snow or ice storms. If, before the start of the workday, severe weather conditions occur, you should call your supervisor/Manager, Department Director and/or Center Human Resources to advise them of the poor weather conditions in your area and your expected time of arrival. Depending on the circumstances, the supervisor/manager, Department Director or Center Human Resources may advise or offer you the option to remain at home that day. As you are provided with an option to remain at home during inclement weather, the Company will not be responsible for any personal injuries or property damage if you attempt to arrive at work.

Finally, if it is announced on the radio or television news or cell phone alert that schools will be closed in your area due to inclement weather, it is advisable to remain at home that day; however, be sure to contact your supervisor/manager, Department Director or Human Resources to advise them of the weather-related closures in your area. While our policy requires that you speak directly with your supervisor/manager, Department Director or Human Resources, it is advisable that should you be unable to speak directly with your supervisor/manager, Department Director, or Human Resources when you make the call, please be sure to leave your name, a brief message, your phone number, and date and time of your call. And in ADP, this time off will be recorded against your available vacation or sick time.

EDUCATIONAL ASSISTANCE

As a successful federal contractor involved in Job Corps and Workforce Investment Programs, ODLE recognizes the importance of education and professional growth. The Company advocates career development, and encourages employees to advance their education, thereby increasing competencies in their present jobs and the employee's preparation for advancement.

Classes that employees must take to meet certain requirements of their job such as a Certification will be reimbursed through payroll as a 1X Only Bonus.

Employees are NOT allowed to complete homework at work; the only exception is that you may complete homework during your unpaid lunch hour.



*MAXIMUM PERFORMANCE
DRIVES SUCCESS!*

Policies in Brief - Acknowledgement

Odle Management (ODLE) reserves the right to amend, modify or terminate these policies at any time. This document states general information and guidelines about the company’s confidential policies and procedures in effect on the date of publication; we will try to inform you of changes as they occur. These policies and procedures are not all-inclusive; therefore, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice to you, you should address your specific questions to your Department Manager/Director, Center Human Resources, and then, as applicable, to Corporate Human Resources.

Nothing contained in this document may be construed as creating a promise of future benefits or a binding contract with ODLE for benefits or for any other purposes. Further, ODLE is an “at will” employer and as such employment with ODLE is not a fixed term or definite period and may be terminated at the will of either party, with or without cause, and without prior notice.

I certify that I have read, understand and will comply with the ODLE position on the policies and procedures.

Date: _____

Print Name: _____

Signature: _____