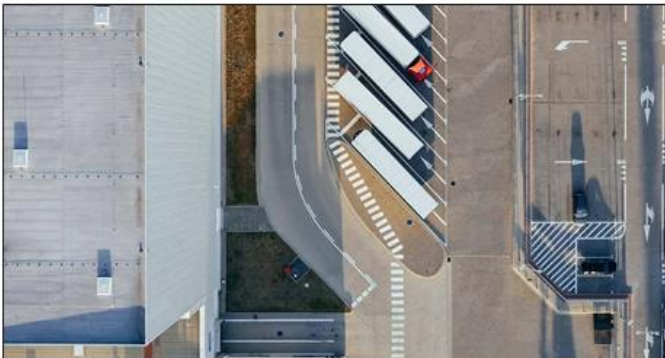


**BRIDGE INVESTMENT GROUP**

# Employee Handbook

— 2022 —



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1	2.1.2019	KC	Published approved Version
1.2	10.10.2019	KC/SC	Added M/V and Information Security Policy
2	2.1.2020	KC/TF	Added Third Party Service Provider/ Contractor Policy Published approved updated version
3	2.1.2021	KC	Added Human Trafficking Awareness Policy and update Voting Leave Policy Published approved updated version
3.1	12.31.2021	KC	Added Political Contributions Policy and Fiduciary Responsibility Policy
4	2.1.2022	KC/SC	Updated Information Security Policy Added Modern Slavery Policy Published approved updated version

## MISSION STATEMENT

Bridge seeks to be a globally trusted investment manager offering exceptional returns to our investors, pursued with uncompromising principles. We are a high-touch, detail-oriented investor in the commercial real estate and fixed income sectors.

We are a people business. It is a privilege to serve as steward of our Investors' capital. Our residents and tenants are the lifeblood of our assets. We strive to create vibrant communities where people are excited to live and work. We hire the best people and provide them with unparalleled opportunity to succeed and advance.

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## CORE VALUES

### TEAMWORK

We emphasize teamwork in everything we do.  
We thrive on collaboration, hard work and open and honest communication.  
We forge strong and inclusive relationships, trust each other, and win as a team.

### EXCELLENCE

We strive to be the best performing firm in our industry.  
We take pride in our performance and celebrate our achievements.  
We do what is right – for the right reasons.

### ACCOUNTABILITY

We stand behind our word and strive for continuous improvement in all that we do.  
We face facts and realities, and we embrace challenges.

### EMPOWERMENT

We empower our people to reach their full potential.  
We cultivate a diverse and inclusive culture of disciplined analysis and action.  
We believe that diversity is the only path to superior performance.

### SPECIALIZATION

We develop specialized investment and operating teams which have deep sectoral knowledge of the areas in which we invest. We use data, carefully analyzed and fully vetted, to complement decades of experience, in guiding our investment decisions.

### CREATIVITY & INNOVATION

We consistently reexamine how we operate and seek innovative solutions to improve our performance, at the asset level, at the Fund level and at the corporate level. New ideas are carefully examined and adopted if appropriate.

### RESPONSIBILITY

We invest and operate responsibly and believe that strong corporate and individual citizenship go hand-in-hand. We understand that responsible investing does not sacrifice returns but should in fact enhance risk and return characteristics through deliberate and thoughtful integration of environmental, social and governance best practices.

# Employee Handbook

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# WELCOME!

We are excited to have you as part of our team. It has been said that exceptional growth begins by acquiring talented people. You have been hired because your talents, skills, and attributes match the standard of excellence to which we hold our company, and we believe you can contribute to the success of our company.

The relationships we build here in our company have always been our focus, our priority, and the key to our success. We are therefore committed to quality and unparalleled customer service in every aspect of our business. As the newest member of our growing team, we hope you find such a pursuit of excellence to be a rewarding part of your career. We know from experience that if you succeed, we all succeed.

This employee handbook is designed to serve as an introduction to our company and contains the key policies, benefits, expectations, and other information you will need to know as you begin your new career with us.

We look to the future with confidence, and we hope that your employment with us will bring you professional satisfaction and growth throughout the coming years. Working together, let's continue to grow as a place where we are proud to work.

Congratulations!

Bridge Leadership Team

# FOREWORD

## IMPORTANT NOTICE:

The contents of this handbook, published February 1, 2022, apply to all employees of Bridge Investment Group Holdings LLC; Bridge Property Management, LC; and Bridge Commercial Real Estate LLC (hereinafter referred to individually and/or collectively as the “Company”).

Upon receiving this handbook, you will be asked to sign an “Employee Acknowledgment Form” which verifies that:

- You have received the handbook;
- You agree to familiarize yourself with its contents; and
- You agree to abide by all company policies and practices described herein.

Signing the “Employee Acknowledgment Form” is a condition of your employment or continued employment with the Company.

Whether you have just joined our staff or have been with the Company for a while, we are confident that you will find our company to be a dynamic and rewarding place to work, and we look forward to a productive and successful partnership with you. Our employees are our most valuable resources, and this handbook has been written to serve as your guide for employer/employee expectations and policies.

This handbook contains only basic information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures. For that reason, if you have any questions concerning eligibility for a particular benefit or the applicability of a policy or practice to you, you should direct your specific questions to the Human Resources Department. Neither this handbook nor any other company document confers any contractual right, either expressed or implied, to remain in the company's employ. Nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time and may be terminated at will with or without cause and without prior notice by the company; or you may resign for any reason at any time. Employment with the company is at will, and any employee whose salary is greater than \$100,000 will not be engaged without approval of the Executive Committee and/or Board.

The procedures, practices, policies, and benefits described herein may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.

This handbook, and the information in it, should be treated as confidential. No portion of this handbook should be disclosed, except to an employee or an affiliate with the Company who requires the information for the normal course of business.

Some subjects described in this handbook are covered in detail in official policy documents. Refer to those documents when more specific information is required as this handbook only briefly summarizes guidelines and benefits.

## NATURE OF EMPLOYMENT

Employment with the Company is voluntarily entered into and you are free to resign at will at any time, with or without cause. Similarly, the Company may terminate the employment relationship at will at any time, with or without notice or cause, so long as there is no violation of applicable federal or state law.

**Policies set forth in this handbook are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between the Company and any of its employees. The provisions of the handbook have been developed at the discretion of the Company and, except for its policy of employment-at-will, they may be amended or cancelled at any time at the Company's sole discretion. Neither this handbook nor any other policy statement or communication can create a binding contract of employment concerning how long a person can hold a job nor whether some notice must be given, procedure followed, or standard met before an employee's job status can be changed.**

This handbook supersedes all prior statements, summaries, and understandings on these subjects. No representative of the Company, other than a member of the Executive Committee, has any authority to enter into any arrangement modifying or supplementing the provisions of this handbook, and any such arrangement will be in writing and signed by a member of the Executive Committee.

Nothing in this handbook is intended to unlawfully restrict an employee's right to engage in any of the rights guaranteed to them by Section 7 of the National Labor Relations Act, including but not limited to, the right to engage in concerted protected activity for the purposes of their mutual aid and/or protection. Nothing in this handbook will be interpreted, applied, or enforced to interfere with, restrain, or coerce employees in the exercise of Section 7 rights.

# DIVERSITY

## Equal Employment Opportunity Statement

Bridge Investment Group LLC (Bridge or the Company) provides equal employment opportunities to all employees and applicants for employment without regard to race (including hair texture, hair type, or protective hairstyles that are commonly or historically associated with race), creed, color, sex (including pregnancy or transgender status), sexual orientation (including gender identity), age, national origin, ancestry, disability (mental or physical), veteran status, or any other protected status in accordance with applicable federal, state, or local laws (“Protected Categories”). The Company complies with applicable state and local laws governing nondiscrimination in employment in every location in which the Company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

The Company expressly prohibits any form of unlawful employee harassment based on any Protected Category. Improper interference with the ability of Company employees to perform their expected job duties is absolutely not tolerated.

The Company will not discriminate against, retaliate against, discipline, discharge, or interfere with an employee who has inquired about, discussed, compared, or disclosed his or her wages or the wages of another employee; or who has brought charges, filed a complaint, or caused to be instituted an action based on disclosure of wage information made by an employee.

The Company does not discriminate on the basis of any protected category with respect to the payment of wages. It is the Company’s desire to pay all employees’ wages and salaries that are competitive with other employers in the marketplace in a way that will be motivational and equitable. The Company sets wages that are appropriate for the degree of responsibility and skill for each position.

## Diversity and Inclusion

Bridge is committed to fostering, cultivating, and strengthening a culture of diversity and inclusion.

Our human capital is our most valuable asset. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company’s commitment to excellence.

We embrace and encourage our employees’ differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, political affiliation, race, religion, sexual orientation, veteran status, and other characteristics that make our employees unique.

Bridge diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equality that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees’ varying needs.

- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of Bridge have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to participate in and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative.

## **Anti-Harassment Policy and Complaint Procedure**

The Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the office will be professional and free of bias, prejudice, and harassment.

It is the policy of the Company to ensure equal employment opportunity without discrimination or harassment on the basis of any Protected Category. The Company prohibits any such discrimination or harassment.

The Company encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of the Company to promptly and thoroughly investigate such reports. The Company prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

### ***Definitions of Harassment***

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For the purpose of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission guidelines, as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example:

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

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendos; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess, or sexual deficiencies; leering, whistling, or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other Protected Category is also illegal under federal, state, and local laws and strictly prohibited. Under this policy, harassment is verbal, written, or physical conduct that denigrates or shows hostility or aversion toward an individual or their relatives, friends or associates and that (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities because of their Protected Category or any other characteristic protected by law. Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means. ***Individuals and Conduct Covered***

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to the Company (e.g., an outside vendor, consultant, or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

### ***Complaint Process***

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor (if appropriate) and with Human Resources ([hrconfidential@bridgeig.com](mailto:hrconfidential@bridgeig.com)) right away. Employees may also discuss their concerns with any other supervisor or member of Human Resources.

When possible, the Company encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that their behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. The Company recognizes, however, that an individual may prefer to pursue the matter through the Company complaint procedures.

The Company encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment or discrimination.

Your notification of the problem is essential to us though. We cannot help resolve a harassment problem unless we know about it. Therefore, it is your responsibility to bring your concerns and/or problems to our attention so that we can take whatever steps are necessary to address the situation. The Company takes all complaints of unlawful harassment seriously and will not penalize you or retaliate against you in any way for reporting a harassment problem in good faith.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action up to and including termination. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.



## Policy against Retaliation

The Company is committed to prohibiting retaliation against those who report, oppose, or participate in an investigation of alleged wrongdoing in the workplace. By way of example only, participating in an investigation of alleged wrongdoing in the workplace, includes, but is not limited to:

- Filing a complaint with a federal or state enforcement or administrative agency;
- Participating in or cooperating with a federal or state enforcement agency that is investigating the Company regarding alleged unlawful activity;
- Testifying as a party, witness, or accused regarding alleged unlawful activity;
- Associating with another employee who is engaged in any of these activities;
- Making or filing an internal complaint with the Company regarding alleged unlawful activity;
- Providing informal notice to the Company regarding alleged unlawful activity.

The Company strictly prohibits any adverse action/retaliation against an employee for participating in an investigation of any alleged wrongdoing in the workplace. If you feel that you are being retaliated against, you should immediately contact **the Human Resources Department**. In addition, if you observe retaliation by another employee, supervisor, manager, or non-employee, please report the incident immediately to **the Human Resources Department**.

Any employee determined to be responsible for violating this policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately and may be subject to disciplinary action up to and including termination. The level of disciplinary action will depend on the circumstances surrounding the misconduct.

If a party to a complaint does not agree with its resolution, that party may appeal to the Company's Head of Human Resources.

False and malicious complaints of harassment, discrimination or retaliation may be subject to appropriate disciplinary action up to and including termination after the completion of a thorough investigation.

## Americans with Disabilities Act and the ADA Amendments Act

The Americans with Disabilities Act and the Americans with Disabilities Amendments Act are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities. When necessary they provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of the Company 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. Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, termination, compensation, training or other terms, conditions, and privileges of employment.

If you require an accommodation to perform the essential functions of your job, you must notify your supervisor and/or the Human Resources Department. Once the Company is aware of your need for an

accommodation, we will engage in the interactive process to identify possible accommodations that might enable you to perform the essential functions of the job. 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 the Company. If you believe that you have been treated in a manner that does not comply with these policies, please notify the Human Resources Department immediately.

## **Pregnancy and Childbirth Accommodation**

The Company will provide a reasonable accommodation to any employee who requires an accommodation for conditions related to pregnancy, childbirth, or a related condition to the extent required by law, provided the requested accommodation does not create an undue hardship for the company. Such accommodations may include, but are not limited to, more frequent or longer break periods; more frequent restroom, food and water breaks; acquisition or modification of equipment or seating; limitations on lifting; temporary transfer to a less strenuous or hazardous position if available, with return to the current position after pregnancy; job restructuring; light duty, if available, assistance with manual labor; or modified work schedules. If you require an accommodation to perform the essential functions of your job, you must notify Human Resources. Once we are aware of the need for an accommodation, we will engage in an interactive process to identify possible accommodations.

# EMPLOYMENT

## Employee Classification Categories

All employees are designated as either nonexempt or exempt under state and federal wage and hour laws. The following is intended to help employees understand employment classifications and employees' employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time. The right to terminate the employment-at-will relationship at any time is retained by both the employee and the Company.

**Nonexempt employees** are generally employees who are paid hourly and entitled to overtime compensation under the FLSA and similar state wage and hour laws. They are NOT exempt from the law's requirements concerning minimum wage and overtime.

**Exempt employees** are generally managers, professionals, administrators that make decisions on a managerial level, or technical staff who ARE exempt from the minimum wage and overtime provisions of the FLSA and similar state wage and hour laws. Exempt employees hold jobs that meet the standards and criteria established under the FLSA by the U.S. Department of Labor and similar state legislation.

The Company has established the following categories for both nonexempt and exempt employees:

- **Regular full-time:** Employees who are not in a temporary status and who regularly work the Company's full-time schedule of at least 30 hours per week or 130 hours per month. Generally, these employees are eligible for the full benefits package, subject to the terms, conditions, and limitations of each benefits program.
- **Rehired regular full-time:** Employees who previously worked for the company. They must not be an employee for more than 15 days in order to be considered a rehired employee. Generally, these employees are eligible for the full benefits package, subject to the terms, conditions, and limitations of each benefits program beginning of the start of the month following their rehire date.
- **Regular part-time:** Employees who are not in a temporary status and who are regularly scheduled to work less than the full-time schedule but at least 20 hours each week. If a part-time employee works more than 40 hours per week, they will be paid for overtime worked, but does not become eligible for employee benefits unless their status is changed to regular full-time and meets the 60-day requirement, unless certain benefits are required under state or local law. If status is changed to regular full-time, the employee will become eligible for benefits the first day of the month following the change in status. Benefits include but are not limited to health benefits, PTO, holiday pay and any other paid leaves. A 12-month measurement period is in effect to determine a transition from part-time to full-time status.
- **Temporary or Seasonal full-time or part-time:** A temporary or seasonal full-time or part-time position is a short-term position designed to fill a temporary need. The amount of time the employee is needed should be estimated when hired, so that employees are not surprised when the work ends. The position is for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. If status is changed from temporary to regular full-time, the employee will become eligible for benefits the first day of the month after they have met the 60-day requirement as a regular full-time employee, unless otherwise required by state or local law.

Temporary or seasonal workers are not eligible for company benefits, unless specifically stated otherwise in a Company policy, they are deemed eligible according to plan documents, or if

required under state or local laws. Temporary employees will not have access to company systems unless they have been properly vetted and approved by Human Resources.

## **Background and Reference Checks**

To ensure that individuals who join the Company are well qualified and to ensure that the Company maintains a safe and productive work environment, it is our policy to conduct pre-employment background checks on all applicants who accept an offer of employment. Background checks may include verification of any information on the applicant's resume or application form, as permitted by law.

All offers of employment are conditioned on receipt of a background check report that is acceptable to the Company. All background checks are conducted in conformity with the Federal Fair Credit Reporting Act, the Americans with Disabilities Act, state and federal privacy, and antidiscrimination laws, and all other applicable federal, state, and local laws. The Company uses best efforts to ensure reports are kept confidential and are only viewed by individuals involved in the hiring process.

If information obtained in a background check would lead the Company to deny employment, a copy of the report will be provided to the applicant, and the applicant will have the opportunity to dispute the report's accuracy. Background checks may include a criminal record check, where permitted under state law, although a criminal conviction does not automatically bar an applicant from employment.

Additional checks such as a driving record or credit report may be made on applicants for particular job categories if appropriate and job related.

### ***Motor Vehicle Reports***

Employees that are required to drive their own vehicle or rent a vehicle for company purposes must hold a valid state driver's license for the class of vehicle they are driving, and will be required to have their driving records reviewed on a regular basis. The employee's driving record will be reviewed by management to determine whether the employee is authorized to drive on behalf of the Company. Employees will also be required to provide proof of personal vehicle insurance coverage periodically.

### ***Immigration Compliance***

As a condition of employment and in compliance with federal law, each new employee must complete an I-9 Form along with any applicable state forms, and present documents that establish identity and employment authorization. You will not be allowed to continue employment unless you provide proper documentation.

## **Internal Transfers/Promotions**

Supervisors are responsible for making any changes to an employee's status that will affect either the employee's pay or their job title. The Company may initiate transfers of employees between departments and facilities to meet specified work requirements and reassignment of work requirements. Increases to the employee's pay are generally made by the recommendation of the employee's supervisor.

The Company offers employees promotions to higher-level positions when appropriate. Management prefers to promote from within and may first consider current employees with the necessary qualifications and skills to fill vacancies above entry level candidates, unless outside recruitment is considered to be in the Company's best interest.

Direct Supervisor have a responsibility to make sure that any other changes in status are completed, the Human Resource Information System (HRIS) in a timely manner.

## Internal Application Policy

Employee

### *Policy*

Any eligible and qualified employee may apply for a posted position by completing an “Employee Internal Job Application Request Form”. However, applications will only be considered for the position if the employee:

- Has a signed acknowledgement form from their current supervisor.
- Has a minimum of 12 months continuous service in their present position or the acknowledgement of their current supervisor.
- Meet the minimum education, experience, skills and required qualifications for the open position.

**Before submitting the internal job application request, employees must discuss with their supervisor their desire to apply for an internal position.** Employees interested in applying for an open position can apply through the official company applicant tracking system or contact the company recruiter. Employees must complete the internal job application form before a formal interview is scheduled.

Transfer timing should be discussed and agreed upon between the current and new supervisors. Factors such as the urgency to fill the position, status of the employee's present workload and difficulty in filling the employee's present position are to be considered in determining a transfer date.

### *Open Position Exceptions*

The Company will typically not post positions within a department to be filled by employees returning from a medical, family, military, personal leave of absence, by employees whose position is being eliminated (due to reorganization or reduction in headcount), or based on other special circumstances, unless required under state or local laws.

### *Manager/Supervisor*

**Before signing the internal job application acknowledgement, the employee’s current supervisor must discuss with the employee their desire to apply for an internal position.** When the hiring manager receives the signed authorization, it is recommended that they reach out to the employee’s current supervisor to review the employee’s decision to apply. Supervisors shall not retaliate against an employee who requests consideration for a transfer. Hiring managers are required to notify the employee’s current supervisor to inform them if an offer has been made and accepted. Both managers will discuss next steps and agreed on timeline for transfer to ensure all current and future departmental needs are considered when deciding the employee’s official transfer and start date.

Supervisors should not actively recruit within the company and should work with the company recruiter for any potential internal applicants who have the qualifications and expressed an interest in applying for the open internal position.

Employees that are denied an opportunity to complete the internal application process through the supervisor approval process have the right to file an appeal through the company Human Resource Department.

### *Compensation*

Hiring managers are expected to discuss and confirm the employee's current salary and rate of pay with the Human Resources Department prior to extending an offer. Hiring managers may grant a salary increase, within company pay scale guidelines, for a promotion (**a move to a job in a higher level**). In general, no salary increase should be provided for a lateral transfer (**a move to a similar job in the same level**) because there is no increase in the level of responsibility. When an employee transfers to a job in a lower salary, the manager should consult with the Human Resources Department. Typically, the employee's salary or hourly rate should be reduced because the level of responsibility has decreased.

## **Nepotism, Employment of Relatives, and Personal Relationships**

Decisions about hiring, promoting, evaluating, awarding salary increases, and terminating employees are based on qualifications for the position, ability, and performance. Every attempt is made to avoid favoritism, the appearance of favoritism, and conflicts of interest in employment decisions.

To avoid accusations of favoritism, abuse of authority and sexual harassment, we prohibit supervisors from dating employees who report to them. This restriction may extend to every manager within two levels above an employee, regardless of team or department to facilitate moving or promoting employees.

Supervisors are strictly forbidden from dating their direct reports. If this occurs and relationship is not reported to HR, the supervisor may face disciplinary action up to and including termination.

The Company reserves the right to take action when relationships or associations of our employees impact our mission. This policy is intended to ensure effective supervision, internal discipline, security, safety, and positive morale in the workplace. It also seeks to avoid the perception of favoritism, conflicts in loyalty, discrimination, the appearance of impropriety, and conflicts of interest.

If employees begin a dating relationship or become relatives, partners, or members of the same household they are required to inform management and Human Resources of the relationship within 14 days of that union. If an individual directly supervises another employee in which they are currently in a relationship or a family member all employment raises, promotions, and disciplinary action for that individual will be conducted by a different supervisor higher in the chain of command. The Company reserves the right to transfer individuals from situations where there is a conflict or the potential for conflict because of the relationship between employees, even if there is no direct-reporting relationship or authority involved.

## **Connected Hire Policy**

Bridge is an equal opportunity employer and supports the prevention of unfair nepotism practices to ensure that fair hiring practices are utilized at all times. To ensure that our organization and hiring processes are free of any conflict of interest, we have adopted this policy to ensure that potential connected hires are handled equitably and transparently. It is acknowledged that this policy is an update of prior policies in place by the company with respect to this issue and therefore the company will "grandfather" existing relationships but put into place appropriate procedures to make sure the intent and purpose of this policy is adhered to even where prior conflicts exist.

### ***Intent***

The purpose of this policy is to:

- Legitimately prevent a conflict of interest or the appearance of a conflict of interest that arises through a connected hire. A connected hire is defined as the hiring or employment of friends and relatives; and/or the friends and relatives of investors, regulators, or officials to whom the Company has an obligation.

- Legitimately prevent the misuse of authority and influence or the appearance of such misuse.

### ***Policy***

The Company will not discriminate in its hiring practices on the basis that a person is a connected hire. To this end, connected hires are eligible for employment with the company provided that:

- The hiring process is open and equitable, and candidates are selected in accordance with the Company's hiring related policies;
- The Company will accept applications from, and consider a connected hire if the candidate has all the requisite qualifications and is properly vetted through the talent acquisition vetting process;
- A family member or friend shall not be considered for employment if by doing so, it might create a direct or indirect managerial/subordinate relationship with the friend or family member, or if their employment could create a conflict of interest;
- The Company employees, regulators or government officials do not directly or indirectly influence the selection and hiring process in which their relative or friend is a candidate;
- Managers and supervisors exclude themselves from any hiring process where their relative or friend is a candidate;
- A direct or indirect supervisor/subordinate reporting relationship is not created between such employees; and/or
- Relatives and friends are not employed in positions where a real or potential conflict of interest exists. If a real or perceived conflict of interest arises due to marriage/cohabitation, or if two or more related employees work in a situation where there is a real or perceived conflict of interest:

The employees will notify their manager/supervisor or Human Resources.

The manager/supervisor and Human Resources will work together to assess the situation and determine whether there is a real or perceived conflict of interest. If there is a real or perceived conflict of interest, the Department Manager will be informed.

The Department Manager, in consultation with Human Resources and the manager/supervisor, will make reasonable efforts to investigate suitable options within the company for one of the related employees.

- A direct or indirect supervisor/subordinate reporting relationship which may currently exist will require approval and oversight from a more senior member of Executive management who will work with HR as it relates to matters of salary, bonus, and promotion and the connected staff member will need to abstain from any final decisions related thereto.

## **Third Party Service Provider (Contractor) Policy**

### ***Purpose***

The security of the organization's information and information processing facilities should not be downgraded by the introduction of external party products or services. Where there is a business need for working with external parties that may require access to the organization's information and information processing facilities, security controls should be agreed and defined in a legal document with the external party. This helps ensure that the continued protection of confidential data will be enforced by external parties.

## ***Scope***

This policy applies to all third-party service providers accessing, processing, communicating, or managing the organization's information or information processing facilities, or adding products or services to information processing facilities which may contain confidential data.

## ***Policy***

When a third-party service provider will be in possession of customer data which belongs to the organization, policies and procedures must be implemented to manage service providers, to include the following:

- Maintain a list of service providers.
- Maintain a written agreement that includes an acknowledgement that the service providers are responsible for the security of customer data the service providers possess.
- Ensure there is an established process for engaging service providers including proper due diligence prior to engagement.
- Maintain a program to monitor service providers' compliance (i.e., annual review of Type II SOC report)

## ***Data Handling and Cyber Training***

All Contractor Personnel shall be required to successfully complete company required "Data Handling & Cyber Security" training in the first 30 days of their contracted position with the company.

All Contractor Personnel shall be required to meet certain criteria prior to performing activities or having access to Company systems. Please contact Human Resources with questions or reference the complete Third Party Service Provider (Contractor) Policy which is available within the Contractor Handbook.

## **Separation of Employment**

Separation of employment within an organization can occur for several different reasons. Upon termination it is the responsibility of the employee to make sure that the Payroll Department has their current mailing address.

- **Resignation:** Although we hope an individual's employment with us will be a mutually rewarding experience, we understand that varying circumstances cause employees to voluntarily resign employment. 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 an employee with two weeks' pay in lieu of notice in situations where job or business needs warrant such action. If an employee provides less notice than requested, the employer may deem the individual to be ineligible for rehire depending on the circumstances regarding the notice given.
- **Retirement:** Employees who wish to retire are required to notify their supervisor and the Human Resources Department in writing at least one (1) month before the planned retirement date.
- **Job abandonment:** Employees who fail to report to work or contact their manager directly for two (2) consecutive workdays shall be considered to have abandoned the job without notice, effective at the end of their normal shift on the second day. The supervisor shall notify the Human Resources Department at the expiration of the second workday and



initiate the paperwork to terminate the employee. Employees who are terminated due to job abandonment are ineligible for rehire.

- **Termination:** Employees of the Company are employed on an at-will basis in accordance with state law, and the Company retains the right to terminate an employee at any time.

#### ***Return of Company Property***

The separating employee must return all company property at the time of separation. Company property may include uniforms, cell phones, keys, PCs, Company cash and identification cards. Failure to return some items may result in deductions from the final paycheck.

#### ***Paid Time Off (PTO)***

Accrued, unused PTO leave will be paid in the last paycheck except in instances as outlined in the PTO policy, unless prohibited by state or local law.

#### ***Health Insurance Termination***

Health, dental and vision insurances terminate on the last day of the month of the termination date. All other voluntary insurances terminate on the last day of employment. Employees will be required to pay their share of insurance premiums through the end of the month on their final check. Information for Consolidated Omnibus Budget Reconciliation (COBRA) continued health coverage will be mailed to the employee within 30 days of termination of insurances.

#### ***Rehire***

Former employees who left the Company in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted through the Company's applicant tracking system and must meet all minimum qualifications and requirements of the position.

If a former employee with less than one year of prior service is rehired, the employee will be considered a new employee and will not be eligible for prior service recognition for seniority or benefits plan participation purposes.

If a former employee with more than one year of prior service is rehired, the employee's seniority will be bridged if the employee is rehired within 12 months of the employee's previous separation from the Company. Service recognition will include prior service recognition for accrued leave plans. Previous tenure over one year is counted towards leave accruals but not health insurance benefits.

An employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation or abandoning their position will be ineligible for rehire.

#### ***Management's Open-Door Policy***

The Company is committed to having a positive environment with direct communication between employees and management. In an effort to foster open communications, employees are encouraged to first discuss any question, concern, or problem with their immediate supervisor. These are the individuals who are in the position to resolve most issues or questions effectively. If an employee takes a concern to their immediate supervisor but feels the problem has not been fully resolved, they are encouraged to proceed to the next level of management.

# WORKPLACE SAFETY

## Drug-Free Workplace

The Company has a longstanding commitment to provide a safe and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of employees and to the security of our equipment and facilities. For these reasons, the Company is committed to the elimination of drug and/or alcohol use and abuse in the workplace.

This policy outlines the practice and procedure designed to correct instances of identified alcohol and/or drug use in the workplace. This policy applies to all employees and all applicants for employment of the Company.

### *Employee Assistance and Drug-Free Awareness*

Illegal drug use and alcohol misuse have a number of adverse health and safety consequences. Information about those consequences and sources of help for drug/alcohol problems is available through the Company Employee Assistance Program (EAP) to assist employees with drug and/or alcohol related problems. Contact information is available in the benefits section of this handbook.

Employees should report to work fit for duty and free of any adverse effects of illegal and or legal drugs, including marijuana and/or medical marijuana, regardless of whether it is permitted under state law. Employees must consult with their doctors about the medications' effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor. Employees should not, however, disclose underlying medical conditions unless directed to do so.

Employees are prohibited from the use or possession of alcohol, marijuana, or medical marijuana at any time in the workplace or during hours of employment.

### *Alcohol Consumption at Company Functions*

The Company takes steps to limit the consumption of alcohol at Company functions. The possession, consumption, or use of alcoholic beverages at Company functions may occur only with prior approval from the executive in charge of the host group. After granting approval, that executive has ultimate responsibility for ensuring that employees adhere to the guidelines presented below.

Managers and employees are responsible for adherence to Company policy. Failure to do so may result in disciplinary action, up to and including termination. Excessive alcohol consumption may endanger the health and safety of employees and others around them in addition to tarnishing the Company's reputation. If an employee chooses to consume alcohol at a Company function, the employee must do so in moderation. Inebriation at a Company function may result in disciplinary action, up to and including termination. The safety of employees is of the utmost importance to the Company. Employees who consume alcohol at Company functions must plan ahead for a safe commute after the function. This may include scheduled rides, a designated driver, or use of third-party ride-share or taxi services.

Company functions to which this policy applies may include but are not limited to: receptions for business guests, civic or business organizations; Company-sponsored parties; department picnics and outings; and year-end recognition events.

### *Work Rules*

The following work rules apply to all employees:

- Whenever employees are working, operating any company vehicle, present on company premises, or conducting related work off-site, they are prohibited from:

Using, possessing, buying, selling, manufacturing, or dispensing an illegal or legal drug, including marijuana and/or medical marijuana, regardless of whether it is permitted under state law (to include possession of drug paraphernalia).

Being under the influence of alcohol, an illegal or legal drug, including marijuana or medical marijuana, regardless of whether it is permitted under state law, as identified by local law.

- The presence of any detectable amount of any illegal, legal drug or controlled substance, including marijuana or medical marijuana, regardless of whether it is permitted under state law, in an employee's body while performing company business or while in a company facility is prohibited.
- The Company will not allow any employee to perform their duties while taking prescribed drugs including medical marijuana that are adversely affecting the employee's ability to safely and effectively perform their job duties. Employees taking a prescribed medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce it if asked.
- Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

### ***Required Testing***

The Company retains the right to require the following tests:

- **Pre-employment:** Certain applicants are required to pass a drug test before beginning work or receiving an offer of employment, subject to state and local law. This is determined by the vertical the applicant applies for. A drug test result which is verified as positive for unauthorized use of controlled substances, or found to be substituted or adulterated, will disqualify the applicant for the position offered.
- **Reasonable suspicion:** Employees are subject to testing based on (but not limited to) observations by at least two members of management of apparent workplace use, possession, or impairment. Human Resources must be consulted before sending an employee for testing. Management must use the Reasonable Suspicion Observation Checklist to document specific observations and behaviors that create a reasonable suspicion that an employee is under the influence of illegal drugs or alcohol. Examples include:
  - Movements (unsteady, fidgety, dizzy)
  - Eyes (dilated, constricted or watery eyes, or involuntary eye movements)
  - Face (flushed, sweating, confused or blank look)
  - Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts)
  - Emotions (argumentative, agitated, irritable, drowsy)
  - Actions (yawning, twitching)
  - Inactions (sleeping, unconscious, no reaction to questions)

When reasonable suspicion testing is warranted, both management and HR will meet with the employee to explain the observations and the requirement to undergo a drug and/or alcohol test within two hours. Refusal by an employee will be treated as a positive drug test result and will result in immediate termination of employment

Under no circumstances will the employee be allowed to drive themselves to the testing facility. A member of management must transport the employee or arrange for a cab and arrange for the employee to be transported home.

- **Post-accident:** Employees are subject to testing when they cause or contribute to accidents that seriously damage a company vehicle, machinery, equipment, or property and/or result in an injury to themselves or another. In any of these instances, the investigation and subsequent testing must take place within two (2) hours following the accident, if not sooner.
- Any type of dilute result is unsatisfactory on all tests performed. If a dilute result occurs, individuals will be given one additional opportunity to provide a valid specimen. The individual is required to have the second test performed within 24 hours of notification. The result of the second test will determine whether the individual is either eligible for employment or to continue their employment. An employee, who receives any of the following results will be terminated and is disqualified from consideration for employment for a period of one year from the date of the test result. An applicant who receives any of the following results on the drug test will not be eligible to be hired, and is disqualified from consideration for employment for a period of one year from the date of the test result:

verified positive

second negative dilute

second sample outside the allowed temperature range

cancelled – invalid result where the donor’s explanation is not accepted by the MRO (medical review officer)

verified adulterated

verified substituted

Nothing in this policy shall be construed to discourage or discriminate against any employee solely for reporting a workplace injury or accident.

### ***Consequences***

Applicants who refuse to submit to a drug test, who have been found to have tampered with or altered a drug test, or who tests positive for prohibited substances will not be hired. Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture, or dispense any drug in violation of this policy will be disciplined up to and including termination.

Employees will be paid for time spent in alcohol/drug testing. Employees then will be suspended pending the results of the drug/alcohol test. After the results of the test are received, a date/time will be scheduled to discuss the results of the test. Should the results prove to be negative, the employee will receive back pay for the times/days of suspension.

### ***Confidentiality***

The Company will use best efforts to protect information and records relating to positive test results, drug and alcohol dependencies, and legitimate medical explanations. They shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files.

### ***Inspections***

The Company reserves the right to inspect all portions of its premises for drugs, alcohol, weapons, or other contraband. All employees, contract employees, and visitors may be asked to cooperate in inspections of their persons, work areas, and property that might conceal a drug, alcohol, or other contraband.

Employees who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline up to and including termination.

### ***Crimes Involving Drugs***

The Company prohibits all employees from manufacturing, distributing, dispensing, possessing, or using an illegal drug, including marijuana and/or medical marijuana, regardless of whether permitted under state law, in or on company premises or while conducting company business. Employees are also prohibited from misusing legally prescribed or over-the-counter drugs. Law enforcement personnel shall be notified, as appropriate, when criminal activity is suspected.

## **Workplace Bullying**

The Company defines bullying as “repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment.” Such behavior violates the company Rules of Conduct. All employees should always be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including supervisors and executives, that the Company will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when determining discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. The Company considers the following types of behavior examples of bullying:

- **Verbal Bullying:** Slandering, ridiculing, or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical Bullying:** Pushing, shoving, kicking, poking, tripping, assault, or threat of physical assault; damage to a person’s work area or property.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

If you witness bullying, or believe you have been a victim of bullying, please report the conduct immediately. For more information regarding reporting such conduct, please see the policies above regarding harassment and discrimination. Please contact Human Resources immediately if you have any concerns or questions. Employees may report concerns of work-place bullying without fear of reprisal.

## **Violence in the Workplace**

All employees, customers, vendors, and business associates must be treated with courtesy and respect at all times. Employees are expected to refrain from conduct that may be dangerous to others.

Conduct that threatens, intimidates, or coerces another employee, customer, vendor, or business associate will not be tolerated. The Company resources may not be used to threaten, stalk, or harass anyone at the workplace or outside the workplace. The Company treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence, and suspicious individuals or activities should be reported as soon as possible to a supervisor, Human Resources, or local law enforcement as necessary. When reporting a threat or incident of violence, the employee should be as specific and

detailed as possible. Employees should not place themselves in peril, nor should they attempt to intercede during an incident.

Employees should promptly inform the Human Resource Department of any protective or restraining order that they have obtained that lists the workplace as a protected area. Employees are encouraged to report safety concerns with regard to intimate partner violence. The Company will not retaliate against employees making good-faith reports. The Company is committed to supporting victims of intimate partner violence by providing referrals to the Company's Employee Assistance Program (EAP) and community resources. EAP information is located in the benefits section of this handbook.

The Company will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. The Company will not retaliate against employees making good-faith reports of violence, threats, or suspicious individuals or activities. In order to maintain workplace safety and the integrity of its investigation, the Company may suspend employees suspected of workplace violence or threats of violence, either with or without pay, pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

The Company encourages employees to bring their disputes to the attention of their supervisors or Human Resources before the situation escalates. The Company will not discipline employees for raising such concerns.

## **Human Trafficking Awareness**

The Company is committed to helping victims of human trafficking and taking reasonable steps necessary to prevent human trafficking. In furtherance of this commitment, the Company provides all employees who are likely to interact or come into contact with victims of human trafficking a training on human trafficking awareness.

If you encounter a suspicious situation that seems to involve human trafficking, you are to immediately report it to your manager or supervisor and call 911. You should follow all instructions given to you by the 911 operator. Under no circumstances are you permitted to confront the suspected trafficker alone. Should you have any questions about the human trafficking awareness training requirement or a related matter, please contact your supervisor and/or Human Resources.

## **Modern Slavery Policy**

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Bridge Investment Group we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our policy.

If you encounter a suspicious situation that seems to involve human Modern Slavery, you are to immediately report it to your manager or supervisor and call 911. You should follow all instructions given to you by the 911 operator. Under no circumstances are you permitted to confront the suspected trafficker alone. Should you have any questions about the human trafficking awareness training requirement or a related matter, please contact your supervisor and/or Human Resources.

## **Safety**

It is the responsibility of each employee to conduct all tasks in a safe and efficient manner complying with all local, state, and federal safety and health regulations and program standards, and with any special safety concerns for use in a particular area or with a client.

Each employee has the responsibility to identify and familiarize themselves with the emergency plan for their working area. Each facility shall have posted an emergency plan detailing procedures in handling emergencies such as fire, weather-related events, and medical crises.

It is the responsibility of the employee to complete an Accident and Incident Report for each safety and health infraction that occurs by an employee or that the employee witnesses. Failure to report such an infraction may result in disciplinary action up to and including termination of employment.

Furthermore, management requires that every person in the organization assumes the responsibility of individual and organizational safety. Failure to follow company safety and health guidelines or engaging in conduct that places the employee, client, or company property at risk can result in disciplinary action up to and including termination of employment.

The Safety Coordinator and management shall have the responsibility to develop and the authority to implement the safety and health program in the interest of a safer work environment.

## **Workplace Visitor Policy**

### ***Policy Brief & Purpose***

Our Workplace Visitor policy outlines the rules for receiving visitors at our premises. We want to ensure that visitors will not:

- Distract employees from their work;
- Have access to or open view of company confidential information; or
- Pose threats to our employees, premises, or property.

### **Scope**

This policy applies to all employees. "Workplace Visitors" are defined as family and friends (referred to as personal visitors), vendors, stakeholders, and the general public. This policy does not refer to remote employees or employees from other company locations.

### **Signing In & Visitor Pass**

All visitors entering any corporate office must sign in at the front desk and sign out when leaving (if the visitor has an unescorted access card) and complete a COVID-19 screening. A staff member is required to come to the main reception to greet and escort their visitors. All escorted visitors will receive a visitor's pass upon arrival. This pass must be worn on the visitor's clothing and be visible for the entire duration of the visitor's stay.

### **Visitors**

Employees must always tend to their visitors while they are on the premises. Individual department managers may impose restrictions on visitors in the workplace which are considered appropriate to the level of security and operational needs of the department. Time spent attending to a personal visitor, especially a child, detracts from work production of not only the employee, but also co-workers. Employees are responsible for accompanying any of their underage visitors at all times.

## **Solicitation**

In accordance with our non-solicitation policy, visitors should not solicit employees, gather donations, or request participation in activities while on the premises. Visitors who do not follow these rules will be asked to leave. Any employee who sees an unsupervised visitor or visitors without a pass should notify the Human Resources Department immediately.



# WORKPLACE EXPECTATIONS

## Corporate Office

The Company provides an access badge for employees who either are based at a corporate office or regularly visit the SLC corporate office. These badges are to be worn and visible at all time while within the office. Badges are not to be shared. If an employee forgets or loses their badge, they are to contact Facilities Management immediately to obtain a replacement badge.

## Confidentiality

The Company provides quality services in which information is collected, stored, used, and disclosed in an appropriate manner that complies with both legal requirements and ethical obligations.

All staff should understand their privacy and confidentiality responsibilities in relation to personal information and organizational information about the Company, its clients, staff, and stakeholders. This understanding is demonstrated in all work practices.

The Company uses best efforts to ensure mechanisms are in place to demonstrate that decisions and actions relating to privacy and confidentiality comply with relevant federal, state, and local laws.

Personal information is only used for the purposes for which permission was given, or for purposes that are directly related to one of the functions or activities of the organization. Personal information may be provided to government agencies, other organizations, or individuals if:

- The client or employee has consented;
- It is required or authorized by law; or
- It will prevent or lessen a serious and imminent threat to somebody's life or health.

The Company takes steps to ensure that the personal information it collects is accurate, up-to-date, and complete. These steps include maintaining and updating personal information when we are advised by individuals that the information has changed (and at other times as necessary), and checking that information provided about an individual by another person is correct. If an employee's personal information changes at any point during employment, it is important to report that change, in writing, to Human Resources as soon as possible.

Employees take steps to protect the personal information it holds against loss, unauthorized access, use, modification, or disclosure and against other misuse. These steps include reasonable physical, technical, and administrative security safeguards for electronic and hard copy or paper records as identified below.

Reasonable physical safeguards include:

- Locking filing cabinets that contain confidential information;
- Physically securing the areas in which the personal information is stored;
- Not storing personal information in public areas; and
- Positioning computer terminals and fax machines so that they cannot be seen or accessed by unauthorized people or members of the public.

Reasonable technical safeguards include:

- Using passwords to restrict computer access, and requiring regular changes to passwords;

- Verify emails are sent from valid recipients and avoid clicking on suspicious links;
- Establishing different access levels so that not all staff can view all information;
- Ensuring information is transferred securely; and
- Installing virus protections and firewalls.

If an employee questions whether certain information is considered confidential, they should first check with their immediate supervisor. This policy is intended to alert employees to the need for discretion at all times and is not intended to inhibit normal business communications.

All inquiries about confidential information must be referred to the Human Resources Manager.

## **Protection of the Company’s Trade Secrets and Confidential Information**

As part of their employment with the Company, employees may be exposed to and/or provided with trade secrets (“Trade Secrets”) and other confidential and proprietary information (“Confidential Information”) of the Company relating to the operation of the Company’s business and its customers (collectively referred to as “Trade Secrets/Confidential Information”).

“Trade Secrets” means information, including a formula, pattern, compilation, program, device, method, technique or process, that: (1) derives independent economic value, actual or potential, from not being generally known to the public or to other persons or entities who can obtain economic value from its disclosure or use; and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The Company’s Trade Secrets are (1) not generally known to the public or to the Company’s competitors; (2) were developed or compiled at significant expense by the Company over an extended period of time; and (3) are the subject of the Company’s reasonable efforts to maintain their secrecy.

“Confidential Information” means information belonging to the Company, whether reduced to writing or in a form from which such information can be obtained, translated or derived into reasonably usable form, that has been provided to employees during their employment with the Company and/or employees have gained access to while employed by the Company and/or were developed by employees in the course of their employment with the Company, that is proprietary and confidential in nature.

Part of the consideration employees provide to the Company in exchange for their employment and continued employment with the Company is their agreement and acknowledgement that all Trade Secrets/Confidential Information developed, created or maintained by them shall remain at all times the sole property of the Company, and that if the Company’s Trade Secrets/Confidential Information were disclosed to a competing business or otherwise used in an unauthorized manner, such disclosure or use would cause immediate and irreparable harm to the Company and would give a competing business an unfair business advantage against the Company.

Employees will not, except as required in the conduct of the Company’s business or as authorized in writing by the Company, disclose or use during their term of employment or subsequent thereto any Trade Secrets/Confidential Information. Furthermore, all records, files, plans, documents and the like relating to the business of the Company which employees prepare, use or come in contact with shall be and shall remain the sole property of the Company and shall not be copied without written permission of the Company and shall be returned to the Company on termination or cessation of employment, or at the Company’s request at any time.

## **Flexible Work Schedules / Work-Life Balance**

Bridge values its employees and recognizes the need for supporting flexibility in the relationship between employer and employee, when possible. Our policy recognizes that, at times, some staff may need to work

flexibly and acknowledges that helping our people find an appropriate work-life balance has personal and workplace benefits.

Flexible work arrangements are not appropriate for all employees or positions. It is the responsibility of the employee's supervisor, with department-head support, to assess whether an employee's need for an alternative work schedule can be accommodated. The needs of the individual will be considered along with the operational and business needs of the company.

The following conditions must be met for a flexible work schedule to be approved: The employee must have a satisfactory attendance record, meet all performance expectations in his or her current role and consistently demonstrate the ability to complete tasks and assignments on a timely basis. The nature of the employee's work and responsibilities must be conducive to a flexible work arrangement without causing disruption to the employee's team and Company performance. The privilege to have a flexible work schedule will be based on these factors as well as business needs. It will not be based upon any Protected Category.

## **Conflicts of Interest**

Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, an employee may be faced with situations in which business actions taken on behalf of the Company may conflict with the employee's own personal interests. Company property, information or business opportunities may not be used for personal gain.

Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, employees must seek review from their supervisor or the Human Resource Department.

## **Outside Employment**

Employees are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below.

Activities and conduct away from the job must not compete with, conflict with, or compromise the Company's interests or adversely affect job performance and the ability to fulfill all job responsibilities. Employees are prohibited from performing any services for customers on nonworking time that are normally performed by the Company. This prohibition also extends to the unauthorized use of any company tools or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during paid working time.

Employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours. If the Company determines that an employee's outside work interferes with performance, the employee may be asked to terminate the outside employment. Employees cannot use PTO leave to work on the outside job. Fraudulent use of PTO leave will result in disciplinary action, up to and including termination.

## **Attendance and Punctuality**

Schedules are based upon company need and may vary from person to person within a department. Scheduled work hours should be established and approved by your immediate supervisor. Being at work at your scheduled time every day is important. The Company recognizes that occasional absences are unavoidable. However, excessive absenteeism creates a hardship for co-workers who must do the

absentee's job as well as their own. Because of this, frequent absences can be cause for disciplinary action, up to and including termination of employment. Excessive tardiness or extended breaks/lunches without one's supervisor's permission also can be cause for disciplinary action.

PTO must be scheduled with one's supervisor in advance. It may be used in the case of emergency or sudden illness without prior scheduling. Patterns of absenteeism or tardiness may result in discipline even if the employee has not yet exhausted available PTO. Absences due to illnesses or injuries that qualify under the Family and Medical Leave Act (FMLA) will not be counted against an employee's attendance record. Medical documentation, within the guidelines of the FMLA, may be required in these instances.

If it is impossible to report to work for any reason, the employee must notify their supervisor personally at least two (2) hours or more in advance of their shift reporting time. If the employee is going to be late for their scheduled shift, they must make every effort to notify their immediate supervisor as soon as they determine they will be late. The employee should be prepared to explain the reason for their absence or tardiness and the time frame in which the employee expects to be able to report for work. Employees absent for more than two (2) consecutive days, unless otherwise required under state law, due to illness may be asked to provide a doctor's verification of illness and a release to return to work. A Doctor's verification is required in all requests for leaves of more than 5 consecutive work days, which are due to an employee's illness, an eligible family leave or a family member's illness.

Not reporting to work and not calling to report the absence is a no-call/no-show and is a serious matter. The first instance of a no call/no show will result in a final written warning. The second offense may result in termination of employment with no additional disciplinary steps. **A no call/no show lasting two days will be considered job abandonment and will be deemed an employee's voluntary resignation of employment.**

## **Attire, Grooming and Hygiene**

It is important for all employees to project a professional image while at work by being appropriately groomed and attired. Employees are expected to be neat, clean, and well-groomed while on the job. Clothing must be consistent with the standards for a business environment and must be appropriate to the type of work being performed.

All employees must be covered from shoulders to knees at all times. Clothing that reveals cleavage, one's back, one's chest, one's stomach, or one's underwear is not appropriate for a place of business.

No dress code can cover all contingencies, so employees must exert a certain amount of judgment in their choice of clothing to wear to work. If an individual experiences uncertainty about acceptable professional business attire for work, they should ask their supervisor or Human Resources.

The Company respects all religious practices. If an employee requires a religious accommodation with respect to religious dress or grooming practices, please see Human Resources to discuss such accommodation.

**If you think it may be inappropriate, it probably is.**

*Site employees should consult leadership for information relating to the dress code and uniform policy for office, engineering, and maintenance staff.*

### ***Dress Code Policy***

The Company prides itself on the professional atmosphere it maintains and the positive image that employees present as representatives of the Company. This image is affected by the manner of dress we use within our offices, in the offices of our clients, and in public when we are representing the Company. We are always searching for new ways to make our Company a better place to work. Offering everyone

the opportunity to dress in business casual during the entire week wear offers a great way for employees to be more comfortable. We need to continue to present a professional image toward clients and the public.

It is important that employees use their best judgment in dressing appropriately. Employees who prefer to dress more formally should feel free to do so. Casual business wear encompasses many looks but it means casual clothing that is appropriate for a professional office environment.

**We currently have a dress practice allowing more casual clothes to be worn on Fridays (casual Fridays). However, management reserves the right to exercise discretion in administering this policy as there may be times when jeans may be considered inappropriate. If the employee is meeting clients, business dress may be required, even on designated dress down days. In this case, management may designate an alternate day. The Company reserves the right to change or revise this policy at any time, at its sole discretion.**

Management reserves the right to determine appropriateness. If attire or grooming fails to meet these standards, as determined by the employee's supervisor, the employee will be asked not to wear the inappropriate item to work again. If the problem persists, the employee may be sent home to change clothes and will receive a verbal warning for the first offense. The employee will not be compensated for time missed if the employee must go home to change clothes. Continued disregard of this policy may be cause for disciplinary action, which may result in termination.

## **Electronic Communication, Internet, and Company Equipment Use**

(For the full policy, please refer to the Information Security Policy)

The use of Company automation systems, including computers, fax machines, and all forms of Internet access, is for Company business and for authorized purposes only. Brief and occasional personal use of company automation systems is acceptable as Electronic Communication, Internet, and Company Equipment Use

The use of Company automation systems, including computers, fax machines, and all forms of Internet access, is for company business and for authorized purposes only. Brief and occasional personal use of company automation systems is acceptable as long as it is not excessive or inappropriate, occurs during personal time (lunch or breaks), does not result in expense or harm to the Company, or otherwise violate this policy.

Use is defined as "excessive" if it interferes with normal job functions, responsiveness, or the ability to perform daily job activities. Electronic communications should not be used to solicit or sell products or services that are unrelated to the Company's business; distract, intimidate, or harass coworkers; or disrupt the workplace.

Nothing in this policy will be interpreted or enforced to interfere with or restrain an employee's right to engage in any of the rights guaranteed to them by Section 7 of the National Labor Relations Act.

The following guidelines have been established for using the Internet, cell phones, e-mail, computers, and company equipment in an appropriate, ethical, and professional manner:

- Internet, company issued equipment (i.e., cell phones, laptops, computers, air cards) and services may not be used for transmitting, retrieving, or storing any communications of a defamatory, discriminatory, harassing, or pornographic nature. If using personal electronics such as cell phones or laptops, the same expectations apply while using the electronics on company premises or for business related purposes.
- The use of personal cell phones for personal reasons should be limited during work hours.

- The following actions are forbidden: using disparaging, abusive, profane, harassing, discriminatory, or offensive language; creating, viewing, or displaying materials that might adversely or negatively reflect upon the Company or be contrary to the Company's best interests; and engaging in any illegal activities, including piracy, cracking, extortion, blackmail, copyright infringement, and unauthorized access of any computers and equipment such as cell phones and laptops.
- Employees should not open suspicious e-mails, pop-ups, or downloads. Contact the IT Department with any questions or concerns to reduce the release of viruses or to contain viruses immediately.
- Internal and external e-mails are considered business records and may be subject to discovery in the event of litigation. Be aware of this possibility when sending e-mails within and outside the Company.

## **Mobile Device Policy**

### ***Introduction***

Mobile devices, such as smartphones and tablet computers, are important tools for the organization, and Bridge supports their use to achieve business goals. However, mobile devices also represent a significant risk to data security as, if the appropriate security applications and procedures are not applied, they can be a conduit for unauthorized access to the organization's data and IT infrastructure. This can subsequently lead to data leakage and system infection.

Bridge has a requirement to protect its information assets in order to safeguard its customers, employees, investors, intellectual property, and reputation. This document outlines a set of practices and requirements for the safe use of mobile devices and applications. Failure to follow this policy may result in discipline, up to and including termination.

### ***Scope***

- All corporate mobile devices, whether owned by Bridge or owned by employees (inclusive of smartphones and tablet computers), that have access to corporate networks, data, and systems are governed by this mobile device security policy. The scope of this policy does not include corporate IT-managed laptops.
- Applications used by employees on their own personal devices which store or access corporate data, such as cloud-based applications, are also subject to this policy.

### ***Policy***

#### ***Technical Requirements***

- Devices used by employees to access corporate networks, data, and systems must use the following Operating Systems: (within (2) revisions of latest release), iOS (within (2) revisions of latest release). Devices must store all user-saved passwords in an encrypted password store.
- Only devices managed by IT will be allowed to connect directly to the internal corporate network. We recommend users connect to the Bridge\_Guest network for mobile devices.
- These devices will be subject to the valid compliance rules on security features such as encryption, password, key lock, etc.

## ***User Requirements***

- Users may only load corporate data that is essential to their role onto their mobile device(s).
- If a user suspects that unauthorized access to company data has taken place via a mobile device, they must report the incident to a Company IT representative immediately. A user must also immediately report the loss or theft of any mobile device that contains Company data or is used to access the Company's networks and systems.
- Devices must be kept up to date with manufacturer or network provided patches. Most devices will update software and apply patches automatically. If your device does not automatically update, at a minimum, you should check for patches weekly and apply patches or updates at least once a month.
- Devices must not be connected to a PC which does not have up-to-date and enabled anti-malware protection and which does not comply with corporate policy.
- The user is responsible for the backup of their own personal data and the company will accept no responsibility for the loss of files due to a non-compliant device being wiped for security reasons. The Company's IT Department will be responsible for determining whether a mobile device needs to be wiped for security reasons. Bridge IT will attempt to remotely wipe all lost or stolen devices. Upon termination of employment, all mobile device users must permit Bridge IT to attempt to remove any Company data. Bridge IT will try to avoid completely wiping the device, but such action may be unavoidable.
- Mobile device users may not select software options such as "remember me" that store or automatically fill-in passwords on their devices.
- Employees using employee-owned devices for business purposes are still responsible for the cost of the device. The Company will not pay for or maintain personal mobile devices. If an employee uses a Company-owned device, the employee will be responsible for any non-business-related costs and expenses, and the Company reserves the right to deduct from an employee's paycheck any charges incurred for an employee's personal or unauthorized use of Company-owned devices. Employees using Company-owned devices also may be responsible for the cost of the device in the case of loss or theft. All employees using a mobile device to access Company data must be aware that privacy in communications over the company network is not guaranteed, and that the Company reserves the right to inspect and monitor mobile devices used for Company business.
- Employees are required to refrain from using their mobile devices while driving in connection with their job duties, except as set forth below. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to pull over to the side of the road, safely stop the vehicle, and put the vehicle in park before using any handheld device. Under no circumstances are employees allowed to place themselves or anyone else at risk to fulfill business needs. Employees who are driving may not use any electronic wireless communications device to write, send, or read any text-based communication, including text messages, instant messages, and/or email messages under any circumstance. Employees who are charged with traffic violations resulting from the use of their handheld mobile devices while driving will be solely responsible for all liabilities that result from such actions.
- Employees must not allow an unauthorized individual to use a mobile device while unattended and must prevent others from using the mobile device to access Company data or networks.
- Employees may not use a mobile device to engage in any illegal activity.

- Employees may not use a mobile device to engage in any activity that violates a Company policy, such as the anti-discrimination and harassment policy.
- Employees should refrain from activity on a mobile device that will slow or pose a security threat to the Company's network. Please contact Bridge IT if you have questions about whether an activity may slow or harm the network.

***Use of particular applications which have access to corporate data are:***

- Cloud storage solutions: Bridge supports the use of the following cloud storage solutions, Box, Yardi & Salesforce, etc. The use of solutions other than the above will lead to a compliance breach and the loss of access to the corporate network for the user, and the employee will be subject to disciplinary action, up to and including termination.

***Right to Monitor***

All company-supplied technology and company-related work records belong to the Company and not to the employee. The Company routinely monitors use of company-supplied technology. Inappropriate or illegal use or communications may be subject to disciplinary action, up to and including termination of employment.

**Social Media-Acceptable Use**

This policy governs employee use of social media, including any online tools used to share content and profiles, such as personal web pages, message boards, networks, communities, and social networking websites and web blogs. The lack of explicit reference to a specific site or type of social media does not limit the application of this policy.

The Company respects the rights of all employees to use social media. However, because communications by Company employees on social media could, in certain situations, negatively impact business operations, customer relations, or create legal liabilities, it is necessary for the Company to provide these guidelines. For example, there are special requirements applicable to publishing promotional content online. Promotional content is content designed to endorse, promote, sell, advertise, or otherwise support a company's products or services. These guidelines are intended to address these and other similar matters.

In addition to ensuring that employee use of social media does not create any legal liabilities, these guidelines are intended to ensure employees understand the types of conduct that is prohibited. This policy will not be interpreted or applied so as to interfere with the protected rights of employees to discuss or share information related to their wages, benefits, and terms of employment amongst themselves or with outside parties.

Employees engaging in use of social media are subject to all of the Company's policies and procedures, including, but not limited to, the Company's policies: (1) protecting certain confidential information related to the Company's operation; (2) safeguarding Company property; (3) prohibiting unlawful discrimination, harassment and retaliation; and (4) governing the use of Company computers, telephone systems, and other electronic and communication systems owned or provided by the Company.

Employees are prohibited from the following:

- Employees may not post personal, financial, confidential, sensitive, or proprietary information about the Company, clients, employees, or applicants on any social media sites.
- Employees may not use social media to post or to display comments about co-workers, supervisors, customers, vendors, suppliers, or members of management that are vulgar, obscene, physically threatening or intimidating, harassing, or otherwise constitute a



violation of the Company's workplace policies against discrimination, retaliation, harassment, or hostility on account of any protected category, class, status, act, or characteristic.

- Employees may not post or display content that is an intentional public attack on the quality of the Company's products and/or services in a manner that a reasonable person would perceive as calculated to harm the Company's business and reduce its income and is unrelated to any employee concern involving wages, benefits, or conditions of employment. Likewise, employees should use discretion when posting any information related to the Company or the employee's position on personal social media websites as it is a representation of both the Company and the employee.

In accordance with applicable laws, the Company may monitor your use of social media and any content that you post on the Internet.

Only those designated by the Executive Committee may make additions, subtractions or edits to company social media sites, websites, or other promotional or marketing materials.

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

NOTHING IN THIS POLICY IS INTENDED TO UNLAWFULLY RESTRICT AN EMPLOYEE'S RIGHT TO ENGAGE IN ANY OF THE RIGHTS GUARANTEED TO THEM BY § 7 OF THE NATIONAL LABOR RELATIONS ACT, INCLUDING BUT NOT LIMITED TO, THE RIGHT TO ENGAGE IN CONCERTED PROTECTED ACTIVITY FOR THE PURPOSES OF THEIR MUTUAL AID AND/OR PROTECTION. NOTHING IN THIS POLICY WILL BE INTERPRETED, APPLIED, OR ENFORCED TO INTERFERE WITH, RESTRAIN, OR COERCE EMPLOYEES IN THE EXERCISE OF § 7 RIGHTS.

## **Solicitations, Distributions and Posting of Materials**

The Company prohibits the solicitation, distribution and posting of materials on or at company property by any employee or nonemployee, except as may be permitted by this policy. The sole exceptions to this policy are charitable and community activities supported by company management and company-sponsored programs related to the Company's products and services.

Provisions:

- Nonemployees may not solicit employees or distribute literature of any kind on company premises at any time.
- Employees may only admit nonemployees to work areas with management approval or as part of a company-sponsored program. These visits should not disrupt workflow. An employee must accompany the nonemployee at all times. Former employees are not permitted onto company property except for official company business.
- Employees may not solicit other employees during work times, except in connection with a company-approved or sponsored event.
- Employees may not distribute literature of any kind during work times or in any work area, at any time, except in connection with a company-sponsored event.
- The posting of materials or electronic announcements are permitted with approval from management.

Violations of this policy should be reported to Human Resources.

## Employee Personnel Files

Employees have the responsibility to ensure the company HRIS has up to date demographic information. This would include a change of address, name change, exemption status, emergency contact, personal contact, etc. as the law requires us to mail certain items (i.e., W2's, insurance cards and COBRA notifications) to the employee's home address. These changes will remain in pending status and will be reviewed and approved by the Payroll Department.

Even if an employee should leave the Company, it is their responsibility to make sure that the Payroll Department has their current mailing address.

Employee files are maintained by the Human Resources Department and are considered confidential. Supervisors or authorized individuals may only have access to personnel file information on a need-to-know basis.

A supervisor considering the hire of a former employee or transfer of a current employee may be granted access to the file, or limited parts of it, in accordance with antidiscrimination laws.

Personnel file access by current employees and former employees upon request will generally be permitted within three days of the request unless otherwise required under state law. Personnel files are to be reviewed in the Human Resources Department. Personnel files may not be taken outside the department. However, and consistent with applicable laws, a current or former employee may, at their own cost, obtain a copy of any part of their own personnel file.

Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information.

For further information regarding appropriate conduct towards representatives of government or law enforcement agencies, refer to your division's standard operating procedures. Other outside parties will only be provided an employee's current status (i.e. "active" or "inactive") and job title unless they provide a signed authorization from the employee or a subpoena. After termination, employees may make one inspection of their personnel files.

## Other Rules of Conduct

The following examples illustrate the types of conduct that are not in the best interest of either the Company or its employees and which, therefore, are prohibited.

*Examples of misconduct include, but are not limited to, the following:*

- Dishonesty, including, but not limited to, theft, falsification of employment, client, vendor, resident, tenant or medical records, or misrepresentation of facts in obtaining employment.
- Comments or actions of a discriminatory nature regarding any Protected Category.
- Insubordination or refusing to carry out the directives of the supervisor.
- Use of company premises for any purpose deemed hazardous.
- Actions detrimental to the best interest of the Company. Such actions include but are not limited to any action which impairs the public reputation of the organization or individual staff members or any action that impairs or damages the successful operation of the Company.
- Destroying, defacing, or damaging property belonging to the Company or property of another employee or customer.

- Using, carrying, or possessing deadly weapons or destructive devices while on the Company's property or during the course of employment, except as may be provided by applicable law, which usually requires firearms to be kept secured in your locked vehicle. More specifically, carrying, using, or possessing any of these weapons or devices is strictly prohibited on the Company's premises: firearms, including, but not limited to, handguns, rifles, pellet guns and similar devices; knives; instruments capable of inflicting a heavy blow, including, but not limited to, nightsticks, clubs and similar devices; explosive devices, including, but not limited to, bombs, grenades and similar devices; and any other device whose primary purpose is the infliction of bodily harm.
- Fighting or intentionally harming another employee, resident, tenant, or vendor, etc.
- Criminal or indecent or inappropriate conduct on company grounds.
- Conviction of a felony while employed. Individuals may be eligible to be hired or rehired after 7 years or in accordance with any applicable laws.
- Conducting personal business on company time or unauthorized use of company property or facilities.
- Acting in a manner disrespectful of another employee of the Company, property resident, tenant or any individual doing business with or associated with the Company.

Violations of this policy may result in appropriate disciplinary action, up to and including termination. Nothing stated in this "Other Rules of Conduct" section changes in any way the agreement and understanding that employment with the Company is at-will as previously described and that the Company is not bound to follow any policy, procedure, or any process in connection with employee discipline, employment termination or otherwise.

### ***Gifts and Favors***

Employees must not use their positions for personal gain or advantage or give that appearance. Employees and their families must not ask for gifts or favors of any sort from vendors or residents. Employees may receive an occasional small gift from vendors or residents on special occasions, such as birthdays, not to exceed \$50. Any gift in excess of this amount should be discussed with management prior to acceptance. Among other things, gifts and favors include entertainment, travel, and the use of living quarters. Gifts that would benefit the entire resident population of a property, however, such as videotapes for a community room, are not prohibited. For further information regarding gift value and acceptable types of gifts, refer to your division's standard operating procedures.

Employees of Bridge Investment Group's SEC Registered Investment Advisors have different guidelines regarding gifts and favors and should consult their Standard Operating Procedures manual for information relating to accepting gifts and favors.

## **Political Contributions Policy**

### ***Scope***

It is the Company policy to permit employees to make political contributions to elected officials, candidates and other, consistent with this policy and regulatory requirements. Employees may make personal contributions to the extent permissible under federal or state law. The Company has adopted the Political Contributions Policy in order to protect against potential abuses with respect to political contributions, comply with fiduciary duties under the Investment Advisers Act of 1940, as amended, seek to avoid even the appearance of impropriety and allow the Advisers to have certain plan investors in the Funds. I.

## ***General Provisions and Contributions and Payments***

No Contribution or Payment to a Political Official, Political Party, PAC or national political party may be made by or on behalf of an Adviser or any Employee (including any Contribution or Payment made by the direction of an Adviser or Employee by an Immediate Family Member) for any reason without pre-clearance from the CCO, generally through the Compliance Software.

### ***Responsibility***

The CCO has the responsibility for the implementation and monitoring of the Company's political contribution policy practices, disclosures and recordkeeping. The full policy is available through the COO.

## **Fiduciary Duty**

The Company has a fiduciary duty to its shareholders. The Company has the duty of care, loyalty, and good faith obligations to act in the best interest of the Company. The Company commits to protect minority shareholders from wrongdoing at the hands of directors, officers, and controlling shareholders. This responsibility extends to controlling shareholders who possess a majority interest in or exercise control over corporate business activities. Directors, officers, and controlling shareholders are expected to act with honesty, good faith, and fairness when handling corporate obligations.

Corporate officers and directors, as fiduciaries, have an obligation to refrain from acting in their own best interests, with respect to decisions made in their fiduciary capacity, where doing so would conflict with the interests of the corporation and its shareholders.

## **Whistleblower Policy**

A whistleblower as defined by this policy is an employee of the Company who reports an activity that they consider to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state, or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact their immediate supervisor or the Human Resources Director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

For standard questions or concerns please speak with your supervisor or use the normal chain of command. To report instances of Fraud, Misconduct, Safety Violations, or Unethical Behavior that you do not feel comfortable discussing with your supervisor please call (855)863-6590 and leave a message. Please be sure to include as much information as possible to aid us in our investigation. All reports will be received and documented by the Internal Audit Department.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Employees with any questions regarding this policy should contact Human Resources.

# COMPENSATION

## Payment of Wages

### *Pay Days*

The Company's paydays occur on a bi-weekly basis every other Friday of each month. If a payday falls on a company holiday, the employee is paid the business day before the holiday. Each year, the Payroll Department publishes a calendar that lists all pay periods, holidays and pay dates. This is available on the Company intranet

### *Payment Methods*

Employees can choose to be paid in the following ways:

- Check
- Direct deposit into a qualified financial institution
- Direct Deposit using the company sponsored pay card

An employee will need to login to the company HRIS to sign up or change their direct deposit. When updating your direct deposit information, the updated information may not take effect immediately and one additional payment may be deposited in the previous account.

In the event of a lost or destroyed paycheck, the Payroll Department must be notified immediately. They will verify the check has not cleared the bank. Upon payroll verification, a replacement check will be issued within 24 hours. In the event the lost paycheck is recovered, and the Company identifies the endorsement as that of the employee, the employee must remit the amount of the replacement check to the Company within 24 hours of the time it is demanded or the company reserves the right to deduct that amount from future paycheck(s) as it would be considered an advance, and salary advances are not permitted.

If an employee's marital status changes or the number of exemptions previously claimed increases or decreases, such information must be updated by the employee through the employee personal HRIS portal page.

### *Garnishments, Attachments and Tax Levies*

As defined in the law, "garnishment" includes tax liens and attachments for child support, alimony, or garnishments from creditors. An employee cannot be disciplined, terminated, or discriminated against because of garnishment action for any one-indebtedness proceeding or for a single attachment or tax levy. It is the responsibility of the Company to deduct the amount set forth in any court document duly received and to forward that amount to the court for payment to the correct party. The Company follows all applicable laws pertaining to wage garnishments, attachments, and tax levies.

## Time Reporting

A work hour is any hour of the day that is worked and should be recorded to the nearest tenth of an hour. The workday is defined as the 24-hour period starting at 12:00 a.m. and ending at 11:59 p.m. The workweek covers seven consecutive days beginning on Saturday and ending on Friday. The Company tracks all hours worked and overtime, along with PTO and other time off from work in the company HRIS.

All non-exempt employees are required to clock in and out daily on the designated payroll website. The timesheet must accurately list the hours worked by the employee during the pay period in which they work. Repeated failure to clock in and out will result in disciplinary action, up to and including termination.

The supervisor must approve the employee's time sheet online. Each supervisor is responsible for ensuring compliance to policy regarding PTO, holiday and overtime pay. If an employee fails to clock in or out for the day, it is the supervisor's responsibility to enter the accurate in and out times.

Non-exempt employees must record both actual hours worked and time away from work on the electronic timesheet provided online. "In" and "out" times (including start times, quit times, lunch periods, and absences) are to be entered on the electronic clocking system daily. Each employee should review daily that the information is recorded accurately. Non-exempt employees who actually work more than 40 hours during a work week will receive overtime pay. Because of this, employees cannot offset overtime worked in one workweek with time off in another week. In addition, employees cannot waive their right, nor can one's supervisor waive an employee's right, to receive overtime pay by asking the employee to take time off in another week.

Each employee is required to maintain an accurate daily record of their hours worked within the company HRIS system. All absences from work schedules should be appropriately recorded and approved by management. Employees are required to only clock in and out from their approved/assigned work-site.

### ***Overtime***

All overtime hours will need to be pre-approved by one's supervisor. The supervisor has the right to decide if it would be in the best interest of the Company to complete the work at a time when overtime would not be necessary. In some situations, there will be an immediate need to complete the job and incur overtime. However, the supervisor must make that decision.

Exempt employees receive regular salary regardless of the number of hours worked in a week. The nature of many exempt positions requires employees to work regular hours outside the normal 40-hour workweek. These employees are not required to sign and date a timesheet but need to report PTO or other time off days for that week in the electronic time system.

Nonexempt employees will be paid overtime in accordance with federal and/or state guidelines. Paid leave, such as holiday, PTO (vacation or sick), Company Time Off (CTO) or other types of none worked-paid time are not considered as hours counted toward the calculation of overtime as these hours are not actually "worked". Please direct any overtime-related questions to your supervisor.

Employees who anticipate the need for overtime to complete the week's work must notify their supervisor in advance and obtain approval before working hours that extend beyond their normal schedule. During busy periods employees may be required to work extended hours.

### ***On-Call Pay (nonexempt employees)***

An on-call employee who is called back to work outside their normal work schedule shall be paid for the time actually worked, in accordance with applicable laws.

Time worked while on call will be calculated at the employee's regular rate of pay, minimum pay of fifteen minutes. If an employee is called back to work, they will be paid for travel time. If an on-call employee is not called, no pay will be earned. Overtime compensation is applicable only when total hours worked exceed 40 hours in a work week or, unless otherwise required under state law, such as hours in excess of 12 hours per day, or 12 consecutive hours, regardless of whether the work period overlaps into a second day.

## **Mid- & End-of-Year Discretionary Bonuses**

Employees may be eligible for mid- & end-of-year discretionary bonuses. However, any employee whose employment terminates prior to the mid-year and/or end-of-the-year discretionary bonus pay dates will not be eligible for any discretionary bonus.

## Meal/Rest Periods

The scheduling of meal periods at the Company is set by the employee's immediate supervisor with the goal of providing the least possible disruption to company operations. Many states require employees to take meal and rest periods. Employees are required to follow their specific state laws.

### ***Mandatory Meal Period***

Some states have mandatory meal periods. Employee meal periods are important to company productivity and employee health. Employees who work at least 5 consecutive hours will be provided a 30-minute meal break. The meal period will not be included in the total hours of work per day and is not compensable. Nonexempt employees are to be completely relieved of all job duties while on meal breaks and must clock out for meal periods.

Because of the nature of our business, and certain employee's jobs, there are situations and circumstances where an uninterrupted meal period is impractical. In situations or circumstances where an uninterrupted meal break is impracticable the employee will be allowed to consume an on-duty meal without any loss of time or compensation.

Employees who are unable to take all of the meal periods to which they are entitled in accordance with this policy or not allowed to consume an on-duty meal, or who have been prevented or discouraged from taking a meal period to which they are entitled or eat on-duty, should immediately notify their supervisor. Failure to report may subject the employee to disciplinary action, up to and including termination of employment.

### ***Rest Period***

Nonexempt employees will also be permitted a 10-minute rest break for every four hours of work, in accordance with the schedule below, unless otherwise required under state law:

Duration of Shift in Hours	# of 10-Minute Rest Breaks	Comments
0 to < 2	0	Employees who work less than two hours in a workday are not required or permitted to take a rest break.
2 to < 6	1	Employees who work at least two hours in a workday but less than six hours in a workday are allowed one 10-minute rest break.
6.0 to < 10.0	2	Employees who work at least six hours in a workday but less than 10 hours in a workday are allowed two 10-minute rest breaks.
10.0 to < 14.0	3	Employees who work at least 10 hours in a workday but less than 14 hours in a workday are allowed three 10-minute rest breaks.



Employees who are unable to take all of the rest periods to which they are entitled in accordance with this policy, or who have been prevented or discouraged from taking a break to which they are entitled under this policy, should immediately notify their supervisor. Failure to report may subject the employee to disciplinary action, up to and including termination of employment.

Employees on rest period are not required to clock in and clock out because this time is considered “time worked” and is compensable. Employees are required to remain on-site during paid rest-breaks but cannot perform any work during the rest periods.

#### ***Impermissible Use of Meal Period and/or Rest Period***

Neither the meal period nor the rest period(s) may be used to account for an employee's late arrival or early departure or to cover time off for other purposes—for example, rest periods may not be accumulated to extend a meal period, and rest breaks may not be combined to allow one half-hour long break. In states that require employees to take meal or rest periods, employees are not allowed to skip or modify these periods unless they submit in writing in advance for each instance.

### **Lactation Policy**

The Company will not prohibit employees from expressing breast milk and will not discriminate against employees who seek to express breast milk for their nursing child for up to 3 years after the child’s birth. In accordance with applicable law, the Company will provide unpaid break time or permit an employee to use paid break time, meal time, or both, each day, to allow the employee to express breast milk. The Company will provide a private room or other location, other than a bathroom, that is in close proximity to the employee’s working area where the employee can express breast milk in privacy.

### **Mileage Reimbursement**

Employees will be reimbursed for business mileage at the current company mileage reimbursement rate. Mileage is only paid for the preapproved use of personal vehicles while performing business related tasks and travel. All mileage must be documented and reported to the employee’s supervisor. This does not include travel to and from an employee’s home.

### **Expense Reimbursement**

Reimbursement requests should be submitted monthly on a timely basis in order to allow time to process. Employees should complete the *Employee Business Expense Reimbursement Form* or through the company travel/expense reimbursement portal and include original receipts when submitting reimbursement requests. These are to be submitted into the employee’s supervisor timely for approval and reimbursement. The following items are not reimbursable expenses: normal commuting, personal expenses, dues or fees for airline clubs or hotel frequent-stayer programs, gambling expenses, health club services, movies (in-room and in-flight), parking tickets, or speeding tickets. Reimbursements must be submitted within 60 days of incurring the cost. Reimbursements beyond that time may not be reimbursed. Reimbursements are required to be submitted within 60 days of incurring the cost. If they are received beyond that time, they may not be eligible for reimbursement.

### **Employee Travel and Reimbursement**

When travel is required, we expect that employees will use good judgment and be fiscally responsible with their expenses. Employees, whenever possible, are to use the company travel portal to book all travel and accommodation needs. In order to help in this process, we have established some basic guidelines to follow for travel. Any variance from the below listed policies must be approved by the employee’s immediate supervisor.

### ***Air Transportation***

In order to optimize cost savings, employees should make travel arrangements at least two to three weeks in advance. When this is not possible, approval must be received from the employee's supervisor prior to booking the flight. Non-refundable tickets tend to be less expensive than refundable tickets. Canceled non-refundable tickets can be applied to future flights up to one year.

Air mileage programs can be set-up by the employee. Airline miles earned on business-related travel are retained by the employee. For individuals who fly Delta, there is also a corporate mileage program. All employees should register the corporate Sky Bonus number to their flight preferences. This number is US822173704.

### ***Lodging***

When it's necessary to stay overnight for business-related travel, lodging reservations are made by the employee. Lodging rates must fall under the guidelines set by the company travel booking vendor. When this is not possible, approval must be received from the employee's supervisor prior to booking the room.

### ***Ground Transportation***

The most cost-effective, efficient, and safe ground transportation should be used. In general, an intermediate or smaller car should be used unless traveling with a group. Basic liability rental car insurance should be purchased, and employees should refuel rental cars prior to returning the vehicle. In some cases, a taxi or ride-share vehicle may be the best mode of transportation.

Rental car programs can be set-up by the employee. Rental car points earned on business-related travel are retained by the employee.

### ***Meals***

Daily maximum amount of \$80 is allowed for meals while traveling on business related purposes. Reimbursement for alcohol consumed is subject to approval. If alcohol is consumed, it's expected that the employee will act responsibly and avoid excess. Employees should stay under the blood alcohol limit as determined by local law.

### ***Parking***

Long-term airport parking will be reimbursed for business related travel. In the event of an emergency (i.e., possibly missing a flight), short-term or garage parking may be used with approval.

### ***Cell Phone Reimbursement***

Certain levels within the organization, which varies by vertical, will receive a monthly cell phone reimbursement that requires supervisor/department head approval and is administered through payroll.

# TIMES OFF/LEAVES OF ABSENCE

## Holiday Pay

The Company provides eleven (11) paid holidays for all eligible full-time employees. Regular full-time employees qualify for holiday pay immediately. Regular part-time, seasonal and temporary employees are not eligible for holiday pay.

The Company has designated Eleven (11) holidays to be observed by all states as follows:

New Year's Day	Juneteenth	Day after Thanksgiving
Martin Luther King Jr. Day	Independence Day	Christmas Eve
President's Day	Labor Day	Christmas Day
Memorial Day	Thanksgiving Day	

Holidays are automatically updated in the company HRIS system and the calendar is available through the Company intranet for review.

There may be occasions when employees are required to work on a company observed holiday. In this circumstance, employees will be given another day off during the week as their holiday. If an employee's actual hours worked for the week are more than 40, they'll receive overtime pay for all time worked in excess of 40 hours. Should the recognized holiday fall on a weekend, a different day will be designated as the "paid holiday".

Employees must work either the day before or the day after the holiday to receive holiday pay, unless on pre-approved paid time-off. Employees on an unpaid leave will not receive holiday pay. A holiday cannot be an employee's last day of employment unless they report to work that day.

Time off may be granted to employees who desire to observe a religious holiday that is not recognized by the Company. These employees are encouraged to request such holiday time off from their supervisor.

## Paid Time Off (PTO)

Each full-time employee will accrue PTO bi-weekly in increments based upon their length of service as defined below. PTO is added to the employee's PTO bank at the beginning of each pay period. Temporary, part-time and seasonal employees are not eligible to accrue PTO. Although PTO generally may only be used after it is accrued, the Company will allow employees to take up to 40 hours of PTO prior to the employee actually accruing 40 hours, unless state law payroll does not allow recouping upon termination; ex: California.

All full-time employees will begin accruing PTO on starting on their first day of employment. Any increase in the amount of PTO time an employee is eligible to earn will take effect on the first of the pay period following their anniversary date.

PTO is earned on the following schedule:

Employee Length of time	Accrual per pay period (26 pay periods per year)	Total Yearly Accrual
0-5 Years	4.61 hours	120 hours (15 days)
5 or more Years	6.15 Hours	160 hours (20 days)

Eligibility to accrue PTO is contingent on the employee either working or utilizing accrued PTO for the entire bi-weekly pay period. PTO is not earned in pay periods during which unpaid leave, short or long-term disability leave, or workers' compensation leave are taken.

Exempt Employees may use time from their PTO bank in 2-hour increments. Non-exempt Employees may use time from their PTO bank in 30-minute increments. If an employee has PTO hours available, they must use their available PTO balance prior to taking any unpaid time off.

Use of PTO requires two weeks of notice to the supervisor unless the PTO is used for emergencies or legitimate, unexpected illness. Requests must be made through the company HRIS. In all instances, PTO must be approved by the employee's supervisor in advance.

Employees are encouraged to use their PTO time each year. Employees may not accrue more than the total yearly accrual, as detailed above. A maximum of 80 hours of accrued PTO time may be carried over from one calendar year to the next. Any remaining unused PTO time will not be paid out. It will be forfeited, unless otherwise required under state or federal law.

PTO will be paid at the employee's base rate at the time the leave is taken. PTO pay is not included in overtime calculation and does not include any special forms of compensation such as incentives, commissions, bonuses or shift differentials. If a holiday falls during the employee's PTO, the day will be charged to holiday pay rather than to PTO pay.

If employment is terminated, any unused accrued PTO will be paid at the employee's base rate of pay, subject to the following exceptions, unless otherwise required under state law: (i) if an employee leaves the company through job abandonment with no notice, or (ii) leaves with no notice before a two weeks' resignation period has been met, then the employee will not receive an accrued PTO payout on their last paycheck, unless required by state or local law. In the case of an employee not staying through their resignation date, accrued and unused PTO will be paid out only if the reason for the early departure is because the employee's supervisor decided to terminate employment prior to the employee's original resignation date. In the event of an employee's death, accrued unused PTO time will be paid to the employee's designated beneficiary or estate. If an employee leaves the Company with a negative PTO balance, the negative balance will be deducted from the employee's final paycheck.

## Discretionary Leave

A discretionary leave of absence is absence without pay, authorized in advance by management, for a maximum time of 8 weeks. At that point the employee must either return to work or be terminated. A leave of absence implies that the employee intends to return to the same or similar position, which will be available when the employee returns. A discretionary leave of absence is not related to a leave that qualifies under the Family and Medical Leave Act (FMLA). Managers, supervisors, and employees who violate this policy are subject to disciplinary action, up to and including termination. Discretionary leave must be pre-approved through Human Resources and the employees' manager/supervisor.

## **Family and Medical Leave**

The function of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law, including any rights afforded by applicable state law.

If employees have any questions, concerns, or disputes with this policy, they must contact Human Resources in writing.

### ***General Provisions***

Under this policy, the Company will grant up to 12 weeks (or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness) during a 12-month period to eligible employees. The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy and specific state laws.

### ***Eligibility***

To qualify for family or medical leave under this policy, the employee must meet the following conditions:

- The employee must have worked for the Company for 12 months or 52 weeks. The 12 months or 52 weeks need not have been consecutive. Separate periods of employment will be counted, provided that the break in service does not exceed seven years. Separate periods of employment will be counted if the break in service exceeds seven years due to National Guard or Reserve military service obligations or when there is a written agreement, stating the employer's intention to rehire the employee after the service break. For eligibility purposes, an employee will be considered to have been employed for an entire week even if the employee was on the payroll for only part of a week or if the employee is on leave during the week.
- The employee must have worked at least 1,250 hours during the 12-month period immediately before the date when the leave is requested to commence. The principles established under the Fair Labor Standards Act (FLSA) determine the number of hours worked by an employee. The FLSA does not include time spent on paid or unpaid leave as hours worked. Consequently, these hours of leave should not be counted in determining the 1,250 hours eligibility test for an employee under FMLA.
- The employee must work in a work site where 50 or more employees are employed by the Company within 75 miles of that office or work site. The distance is to be calculated by using available transportation by the most direct route.

### ***Type of Leave Covered***

To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

- The birth of a child and in order to care for that child.
- The placement of a child for adoption or foster care and to care for a newly placed child.
- To care for a spouse, child, or parent with a serious health condition (described below).
- The serious health condition (described below) of the employee.
- An employee may take leave because of a serious health condition that makes the employee unable to perform the functions of the employee's position.

- A serious health condition is defined as a condition that requires inpatient care at a hospital, hospice, or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care or as a condition that requires continuing care by a licensed health care provider.
- This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences. Generally, a chronic or long-term health condition that would result in a period of three consecutive days of incapacity with the first visit to the health care provider within seven days of the onset of the incapacity and a second visit within 30 days of the incapacity would be considered a serious health condition. For chronic conditions requiring periodic health care visits for treatment, such visits must take place at least twice a year.
- Employees with questions about what illnesses are covered under this FMLA policy or under the Company's PTO policy are encouraged to consult with Human Resources.
- If an employee takes paid PTO for a condition that progresses into a serious health condition and the employee requests unpaid leave as provided under this policy, the Company may designate all or some portion of related leave taken as leave under this policy, to the extent that the earlier leave meets the necessary qualifications.
- Qualifying exigency leave for families of members of the National Guard or Reserves or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to covered active duty.
- An employee whose spouse, son, daughter, or parent has been notified of an impending call or order to covered active military duty or who is already on covered active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following: (a) short-notice deployment, (b) military events and activities, (c) child care and school activities, (d) financial and legal arrangements, (e) counseling, (f) rest and recuperation, (g) post-deployment activities, and (h) additional activities that arise out of active duty, provided that the employer and employee agree, including agreement on timing and duration of the leave.

*Covered active duty* means:

In the case of a member of a regular component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country.

In the case of a member of a reserve component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country under a call or order to active duty under a provision of law referred to in Title 10 U.S.C. §101(a)(13)(B).

- The leave may commence as soon as the individual receives the call-up notice (*Son or daughter* for this type of FMLA leave is defined the same as for *child* for other types of FMLA leave except that the person does not have to be a minor). This type of leave would be counted toward the employee's 12-week maximum of FMLA leave in a 12-month period.
- Military caregiver leave (also known as covered service member leave) to care for an injured or ill service member or veteran.
- An employee whose son, daughter, parent, or next of kin is a covered service member may take up to 26 weeks leave in a single 12-month period to take care of that service member.
- *Next of kin* is defined as the closest blood relative of the injured or recovering service member.

The term *covered service member* means:

- A member of the Armed Forces (including a member of the National Guard or Reserves) who is undergoing medical treatment, recuperation or therapy or is

otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness.

- A veteran who is undergoing medical treatment, recuperation or therapy for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of five years preceding the date on which the veteran undergoes that medical treatment, recuperation, or therapy.
- The term serious injury or illness means:
  - In the case of a member of the Armed Forces (including a member of the National Guard or Reserves), an injury or illness that was incurred by the member in the line of duty while on active duty in the Armed Forces, or any injury or illness that existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces and that may render the member medically unfit to perform the duties of the member's office, grade, rank or rating.
  - In the case of a veteran who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during a period when the person was a covered service member, a qualifying (as defined by the Secretary of Labor) injury or illness that was incurred by the member in line of duty on an active duty in the Armed Forces (or that existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that manifested itself before or after the member became a veteran.

### ***Amount of Leave***

An eligible employee may take up to 12 weeks for the first five FMLA circumstances above (under heading "Type of Leave Covered") under this policy during any 12-month period. The Company will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, the Company will compute the amount of leave the employee has taken under this policy in the last 12 months and subtract it from the 12 weeks of available leave, and the balance remaining is the amount of time the employee is entitled to take at that time.

An eligible employee can take up to 26 weeks for the FMLA military caregiver leave circumstance above during a single 12-month period. For this military caregiver leave, the Company will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave already taken for other FMLA circumstances will be deducted from the total of 26 weeks available.

If both spouses work for the Company and each wishes to take leave for the birth of a child, adoption, or placement of a child in foster care, or to care for a parent (but not a parent "in-law") with a serious health condition, the legal spouses may only take a combined total of 12 weeks of leave. If a husband and wife both work for the Company and each wishes to take leave to care for a covered injured or ill service member, the spouses may only take a combined total of 26 weeks of leave.

### ***Employee Status and Benefits during Leave***

While an employee is on leave, the Company will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work, unless otherwise specified by state or federal law. While an employee is on FMLA leave, the Company will continue to pay its portion of the group health insurance and the employee must continue to pay their portion (if any) for up to a maximum of 12 weeks during any one-year period, unless otherwise specified by state or federal law. To ensure coverage continues, they must send a check to the Payroll Department, for their portion of the insurance premium or contact Human Resources to use PTO to cover insurance

premiums. Payment is due on the Company's payday. Failure to make these payments may result in a lapse in health insurance coverage until the company open enrollment or the employee has an eligible life event.

### ***Employee Status after Leave***

An employee who takes leave under this policy may be asked to provide a fitness for duty clearance from the health care provider.

### ***Use of Paid and Unpaid Leave***

FMLA is unpaid leave unless required under specific state laws. If an employee has PTO or Paid Sick Leave hours available, they must use their available PTO or Paid Sick Leave balance prior to taking any unpaid time off. FMLA leave runs concurrent with any PTO or Paid Sick Leave. While on unpaid FMLA leave, the employee will not be paid for holidays that occur during the leave unless they are using PTO leave during that pay period. The employee will not accrue PTO, Paid Sick Leave, or other benefits while on unpaid FMLA leave.

Disability leave for the birth of a child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA, unless otherwise specified by state or federal law.

### ***Intermittent Leave or a Reduced Work Schedule***

The employee may take FMLA leave in 12 consecutive weeks, may use the leave intermittently (take a day periodically when needed over the year) or, under certain circumstances, may use the leave to reduce the workweek or workday, resulting in a reduced-hour schedule. In all cases, the leave may not exceed a total of 12 workweeks (or 26 workweeks to care for an injured or ill service member over a 12-month period).

### ***Certification for the Employee's Serious Health Condition***

The Company will require certification for the employee's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

### ***Certification for the Family Member's Serious Health Condition***

The Company will require certification for the family member's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

### ***Certification of Qualifying Exigency for Military Family Leave***

The Company will require certification of the qualifying exigency for military family leave. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

### ***Certification for Serious Injury or Illness of Covered Service Member for Military Family Leave***

The Company will require certification for the serious injury or illness of the covered service member. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

### ***Recertification***

The Company may request recertification for the serious health condition of the employee or the employee's family member when circumstances have changed significantly, or if the employer receives



information casting doubt on the reason given for the absence, or if the employee seeks an extension of their leave. Otherwise, the Company may request recertification for the serious health condition of the employee or the employee's family member every six months in connection with an FMLA absence.

#### ***Procedure for Requesting FMLA Leave***

All employees requesting FMLA leave must provide Human Resources with verbal or written notice of the need for the leave. Within five business days after the employee has provided this notice, Human Resources will provide the employee with the Department of Labor, Notice of Eligibility and Rights.

When the need for the leave is foreseeable, the employee must provide the employer with at least 30 days' notice. When an employee becomes aware of a need for FMLA leave less than 30 days in advance, the employee must provide notice of the need for the leave either the same day or the next business day. When the need for FMLA leave is not foreseeable, the employee must comply with the Company's usual and customary notice and procedural requirements for requesting leave.

#### ***Designation of FMLA Leave***

Within five business days after the employee has submitted the appropriate certification form, Human Resources will provide the employee with a written response to the employee's request for FMLA leave.

#### ***Intent to Return to Work from FMLA Leave***

The Company may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

#### ***Job Restoration***

Upon returning from FMLA leave, eligible employees will be restored to their original job or to an equivalent job with equivalent pay, benefits, and other employment terms and conditions.

#### ***Failure to Return after FMLA Leave***

Any employee who fails to return to work as scheduled after FMLA leave or exceeds the 12-week (or 26-week) FMLA entitlement, will be subject to the Company's standard leave of absence and attendance policies. This may result in termination if you have no other Company-provided leave available to you that applies to your continued absence. Likewise, following the conclusion of your FMLA leave, the Company's obligation to maintain your group health plan benefits ends (subject to any applicable COBRA rights).

#### ***Fraud***

Providing false or misleading information or omitting material information in connection with an FMLA leave will result in disciplinary action, up to and including immediate termination.

#### ***Employers' Compliance with FMLA and Employee's Enforcement Rights***

FMLA makes it unlawful for any employer to interfere with, restrain, or deny the exercise of any right provided under FMLA, or discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

While the Company encourages employees to bring any concerns or complaints about compliance with FMLA to the attention of the Human Resources Department, FMLA regulations require employers to advise employees that they may file a complaint with the U.S. Department of Labor or bring a private lawsuit against an employer.

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

## Parental Leave Policy

### *Purpose/Objective*

The company will provide paid parental leave to all full-time eligible employees following the birth of an employee's child or the placement of a child with an employee in connection with adoption or foster care. The purpose of paid parental leave is to enable the employee to care for and bond with a newborn or newly placed adopted or foster child. This policy will run concurrently with Family and Medical Leave Act (FMLA) leave, as applicable. To be eligible for paid parental leave, you must have been employed by the Company for six months prior to the birth or placement of the child. The amount of paid leave will be determined by your tenure.

### *Eligibility*

Eligible employees must meet the following criteria:

- Been employed with the company for at least 6 months
- Worked at least 30 hours or more per week in the 6 months preceding the date the leave would begin
- Be a full-time employee (part-time, seasonal, or temporary employees and interns are not eligible for this benefit)
- In addition, employees must meet one of the following criteria:
- Have given birth to a child or had a child through a surrogate
- Be a spouse or committed partner of an individual who has given birth to a child
- Have adopted a child or been placed with a foster child (in either case, the child must be age 17 or younger). The adoption of a spouse's child is excluded from this policy

### *Amount, Time Frame and Duration of Paid Parental Leave*

- Eligible employees after 6 months of service will receive a maximum of 4 weeks of paid parental leave for the primary caregiver and 2 weeks of parental leave for the secondary caregiver, per birth, adoption, or placement of a child/children. Eligible employees after 2 years of service will receive a maximum of 12 weeks of paid parental leave for the primary caregiver and 2 weeks of paid parental leave for the secondary caregiver per birth, adoption, or placement of a child/children. The fact that a multiple birth, adoption, or placement occurs (e.g., the birth of twins or adoption of siblings) does not increase the total amount of paid leave granted for that event. In addition, in no case will an employee receive more than 12 weeks of paid leave in a rolling 12-month period, regardless of whether more than one birth, adoption or foster care placement event occurs within that 12-month time frame.
- Each week of paid parental leave is compensated at 100 percent of the employee's regular, straight-time weekly pay. Paid parental leave will be paid on regularly scheduled pay dates.
- Approved paid parental leave may be taken at any time during the 12-month period immediately following the birth, adoption, or placement of a child with the employee.
- Paid parental leave may not be used or extended beyond this 12-month time frame.
- Employees taking leave as the primary care provider must take paid parental leave in one continuous period of leave and must use all paid leave during the 12-month time frame indicated above. Any unused paid parental leave will be forfeited at the end of the 12-

month time frame. Employees taking leave as the secondary care provider can take paid parental leave continuously or incrementally.

- Any unused paid parental leave will be forfeited at the end of the 12-month time frame.
- Upon termination of the individual's employment at the company, they will not be paid for any unused paid parental leave for which the employee was eligible.

#### ***Coordination with Other Policies***

- Paid parental leave taken under this policy will run concurrently with leave under the FMLA. Thus, for any leave taken under this policy that falls under the definition of circumstances qualifying for FMLA due to the birth or placement of a child as a result of adoption or foster care, such leave will be counted toward the 12 weeks of available FMLA leave per 12-month period. All other requirements and provisions under the FMLA will apply. In no case will the total amount of leave—whether paid or unpaid—granted to the employee under the FMLA exceed 12 weeks during the 12-month FMLA period. Please refer to the Family and Medical Leave Policy for further guidance on the FMLA.
- After the paid parental leave is exhausted, the balance of FMLA leave (if applicable) will be compensated through the employee's accrued personal time. Upon exhaustion of personal time, any remaining leave will be unpaid leave. Please refer to the Family and Medical Leave Policy for further guidance on the FMLA.
- The Company will maintain all benefits for employees during the paid parental leave period just as if they were taking any other company paid leave such as Paid Time Off (PTO).
- If a company holiday occurs while the employee is on paid parental leave, it will be paid as holiday pay. However, such holiday pay will not extend the total paid parental leave entitlement.
- An employee who takes paid parental leave that does not qualify for FMLA leave will be afforded the same level of job protection for the period that the employee is on paid parental leave as if the employee was on FMLA-qualified leave.

#### ***Requests for Paid Parental Leave***

- The employee will provide their supervisor and the Human Resources Department with notice of the request for leave at least 30 days prior to the proposed date of the leave (or if the leave was not foreseeable, as soon as possible). The employee must complete the necessary HR forms and provide all documentation as required by the HR Department to substantiate the request.
- The employee must certify their status as primary or secondary caregiver at the time of the leave request. This certification must include a basis as to why the employee is requesting primary or secondary caregiver leave.
- As is the case with all company policies, the organization has the exclusive right to interpret this policy.

### **Bereavement Leave**

In the event of a death in an employee's immediate family, and subject to any applicable law, an employee may be granted up to three (3) days of paid bereavement leave to handle matters related to death and grieving. In the event of a death in an employee's extended family, an employee may be granted one (1) day of paid bereavement leave to attend the funeral.

“Immediate family” includes the employee’s spouse, domestic partner, parents (including step-parents, foster parents, parents-in-law, and domestic partner’s parents), siblings, children, children of a domestic partner, step-children, adopted children, employee’s grandparents, grandparents-in-law, step-grandparents, domestic partner’s grandparents, grandchildren, daughter-in-law, son-in-law, and a relative who resides with the employee.

“Extended family” includes the employee’s or the employee’s spouse/significant other’s aunts, uncles and cousins, nieces, nephews, or friend who resides with the employee.

Other time off to attend a funeral for a close personal friend or relative who is not a member of the employees immediate or extended family may be granted by one’s supervisor. Time off that is used for this purpose should be recorded as PTO time or unpaid time and must be approved by one’s supervisor.

If an employee must travel out of town and it requires an overnight stay to attend the funeral, they may take two (2) extra days for travel time. If additional time is needed, the employee may request an unpaid leave of absence or may request the use of accrued PTO time. Any paid time requires that the employee meets the requirements for a regular full-time employee and have fulfilled the 60-day requirement.

Employees are required to notify their supervisor in all instances of bereavement leave. This must also be communicated to Payroll for entry.

## **Court Attendance/Jury Duty Policy**

If an employee is required to attend court for a work-related court case, they will be compensated at their regular rate of pay. This will include travel time and attendance.

The Company views formal jury duty as both an opportunity as well as a community obligation, and that the sacrifice should be supported both by the Company and the employee. Subject to all applicable laws, our policy is as follows:

Upon notification that an employee has been selected for jury duty, it is their (the employee’s) responsibility to notify their supervisor within 24 hours and provide the documentation from the County or Court. Any and all changes in status need to be promptly reviewed with the employee's supervisor.

The employee should do everything reasonably possible to determine the potential timeframe for jury duty and review this with the supervisor as soon as known and on an ongoing basis. The employee and supervisor should work out a schedule for completing the employee's responsibilities before or after jury duty each day and/or on weekends, where reasonably possible. As these are determined, the employee's immediate supervisor should review the possible implications to their supervisor and develop a plan to cover the employee's position.

In any event, compensation provided by the Company to an employee while on jury duty will be reduced by whatever amounts, if any, the employee receives separately as compensation for jury duty, unless the employee is able to complete their responsibilities fully during the period. The Company will provide Jury Leave Pay as required by state and local laws.

## **Voting Leave**

The Company believes that it is the responsibility and duty of employees to exercise the privilege of voting in elections. In accordance with this philosophy, the company will grant its employees approved time off to vote in person, on election day.

Time Off for Voting. All employees should be able to vote either before or after regularly assigned work hours. However, when this is not possible due to work schedules, managers are authorized to grant a reasonable period of time, up to four hours, on election day to vote in person or as required by state law.

This time off will be with pay. All time away must be communicated through your manager to Payroll to ensure time away to vote in person is paid appropriately.

## **Military Leave of Absence**

The Company is committed to protecting the job rights of employees absent on military leave. In accordance with federal and state law, it is the Company's policy that no employee or prospective employee will be subjected to any form of discrimination on the basis of that person's membership in or obligation to perform service for any of the Uniformed Services of the United States. Specifically, no person will be denied employment, reemployment, promotion, or other benefit of employment on the basis of such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised their rights under applicable law or company policy. If any employee believes that they have been subjected to discrimination in violation of company policy, the employee should immediately contact Human Resources.

Employees taking part in a variety of military duties are eligible for benefits under this policy. Such military duties include leaves of absence taken by members of the uniformed services, including Reservists and National Guard members, for training, periods of active military service, and funeral honors duty, as well as time spent being examined to determine fitness to perform such service. Subject to certain exceptions under the applicable laws, these benefits are generally limited to five years of leave of absence.

Employees requesting leave for military duty should contact Human Resources to request leave as soon as they are aware of the need for leave. For request forms and detailed information on eligibility, employee rights while on leave, and job restoration upon completion of leave, refer to the policies, procedures, and forms or contact Human Resources.

## **State Laws**

Bridge complies with all state and local employment laws. Bridge also complies with all state and local laws permitting employees to take unpaid leaves of absence for various reasons, including but not limited to volunteer firefighter leave and crime victim leave. For more information based on a particular state or local law based on your location, see Human Resources.

### **Benefits**

All regular full-time employees have the opportunity to participate in the company group health, dental, vision and life insurance plans, collectively referred to as "the Plan". A full description of the individual plans will be made available to employees. Regular full-time employees will be eligible for insurance coverage the first of the month following hire/rehire date. The insurance providers and terms of coverage and employee-paid amounts may change from time to time. Failure of the employee to pay their portion of their insurance premiums will result in the termination of their health/supplemental insurances.

## **Medical, Dental and Vision Insurance**

The Company offers multiple options for medical, dental, and vision insurance. The employee will be notified of their enrollment periods to make elections or to waive health insurance. Once made, elections are fixed for the remainder of the plan year. Changes in family status, as defined in the Plan document, allow employees to make midyear changes in coverage consistent with the family status change. Please contact the Human Resources Department to determine if a family status change qualifies under the Plan document and IRS regulations.

Each year there is an open enrollment period, which falls in the month of November, employees may change medical, dental, and vision elections for the following calendar year.

The Human Resources Department is available to answer benefits plan questions and assist in enrollment as needed.

## **Domestic Partners**

Domestic partner health insurance is the extension of a health insurance plan to one's domestic partner. In granting domestic partner coverage, insurance providers or employers recognize these relationships and provide the same health insurance benefits as they would to a married couple. The tax consequences of a domestic partnership are the responsibility of the employee. The value of benefits provided to an employee's domestic partner (and to the domestic partner's eligible children, if any) is considered part of the employee's taxable income, unless the employee's domestic partner qualifies as a dependent under Section 152 of the Internal Revenue Code.

Questions regarding this policy should be directed to the Human Resources Department.

## **Group Life Insurance**

The Company offers regular full-time employees, following fulfillment of the 60-Day Requirement, an employer-paid basic group term life policy along with an accidental death and dismemberment policy. Each policy is automatically set up for each qualifying employee.

## **Long-Term Disability Benefits**

The Company offers eligible employees (i.e., regular full-time employees who are regularly scheduled to work a minimum of 30 hours per week) a noncontributory long-term disability (LTD) base plan. This noncontributory base plan provides for monthly LTD benefits of 60% of basic monthly earnings to a maximum benefit of \$6,000 per month, less any other offsets. Regular full-time employees will be automatically enrolled as of the first of the month following sixty (60) consecutive calendar days following the date of hire. Long-term disability coverage terminates on the last day of employment.

Please contact Human Resources for more information.

## **401(k) Plan**

The Company offers a voluntary salary reduction plan, better known as a 401(k) plan, in which regular full-time and regular part-time employees (scheduled for and working a minimum of 20 hours per week), who are 21 years of age or older, will be automatically enrolled once they have met the eligibility requirements. Automatic enrollment will occur after 60 days of employment. Contributions will be 4% of employee's compensation. Employees can change the amount of contribution to higher or lower amount at any time. If an employee does not wish to participate, they can opt-out.

Notices regarding the 401(k) plan are circulated to all employees periodically throughout the year. The Company currently matches employee 401(k) contributions dollar-for-dollar for all participating employees, on the first 4% of eligible compensation.

Further details about the 401(k) plan may be obtained from the Human Resources Department.

## **Workers' Compensation Benefits**

The Company is covered under, and abides by all, statutory workers' compensation laws. Employees who sustain work-related injuries must immediately notify their immediate supervisor. The Company does not discriminate or retaliate against employees who have filed legitimate workers' compensation claims, nor does it take or threaten any action to compel or persuade employees not to file a workers' compensation claim.

## Tuition Reimbursement Policy Summary

The policy is a broad guideline developed by the company to assist with organizational decisions. The procedures detail how the policy should be applied. It is not possible to address every situation or circumstance, and decisions regarding this benefit will be made on a case-by-case basis. The company will make every effort to ensure that all employees are treated fairly under the policy. Please contact Human Resources regarding any questions about the Education Benefit Program.

Full-time Regular employees are eligible and must have worked for Bridge for at least 1 year of continuous service. To be eligible the employee must be in good standing, they cannot be under any corrective action or final warnings.

Employees interested in participating in this education assistance program must complete the Request for Employee Tuition Reimbursement Form prior to the commencement of any coursework for which the employee desires to be reimbursed.

The Department Head of the employee's department must approve the request. When completed, the Request for Tuition Reimbursement Form is submitted to the Human Resource Department for review and approval. Department head written approval is required at least 2 weeks prior to class starting via application.

No set limit on tuition reimbursement amount as program/certification fees vary, however during the employee's entire course of employment, the company will only reimburse up to a maximum of \$10,000. Undergraduate or graduate courses must be completed at regionally accredited colleges or universities. Certifications must be completed through an industry recognized organization. It is preferred that coursework be completed on the employee's own time. Courses cannot disrupt normal services of the employing department. If approved coursework is only available during the employee's work hours, a schedule of proportional compensatory time may be arranged (in the sole discretion of the company), provided normal services of the employing department are not disrupted or impaired.

If the employee receives an incomplete in a course, the employee will have until the end of the following semester in which to complete the work and have the incomplete removed. Failure to complete the work will prohibit the employee from participating in the tuition reimbursement plan. Reimbursement is contingent upon the earning of a passing grade. A "C" or better is considered a passing grade. Percent of reimbursement is, 100% for "A"s, 75% for "B"s and 25% for "C"s.

Upon completion of the course, applicant must submit, within 45 days, legible copies of the following: (1) College/university invoice or statement indicating fees charged and the amount paid (the invoice must contain the school's name and address. Copies of canceled checks and credit card receipts will not be accepted); and (2) College/university grade card/report indicating the applicant's name, quarter/semester, course name(s) and grade(s) for the term.

Employee must be active on the date that the reimbursement is processed for payment to be eligible for reimbursement. Terminated employees will not be eligible for reimbursement unless the termination is due to reduction in force, disability, retirement, or death.

Full amount of tuition repayment is required if the employee leaves the company within 1 year of the completion of any course. If the employee leaves before the 2nd year is complete a prorated tuition repayment will be required depending on the certification/degree. An employee will not be eligible for tuition reimbursement if they withdraw from an approved course or if the approved course is canceled.

We make no representations regarding taxes and that EE may want to consult with tax advisor regarding how tuition reimbursement should be reported. (IRS Regulation 127 allows employers to pay, at no cost to the employee, for educational classes that lead to a degree from an accredited university or college. The regulation allows an employer to pay up to a maximum of \$5,250 per year before having to add any

amount over \$5,250 to an employees' gross wages.) Items not eligible for reimbursement are: meals, lodging, qualifying exams, books, parking, and activity fees.

The employee is required to immediately notify the Department Head and Human Resources if they withdraw from an approved course or if the course is canceled. An employee will not receive tuition reimbursement if they terminate employment prior to completion of an approved course. Audits will be performed on approved payment submissions regularly.

Successful completion of any course(s) does not guarantee continued employment, promotion, salary increase, etc.

## **Employee Assistance Program (EAP)**

Through the employee assistance program (EAP), the Company provides confidential access to professional counseling services. The EAP, available to all employees and their immediate family members, offers problem assessment, short-term counseling, and referral to appropriate community and private services. This service is provided by Met Life Insurance. Employees who wish to utilize the EAP can contact a counselor 24 hours a day, 7 days a week either by phone at 1-888-319-7819 or by visiting their **etliffeap.lifeworks.com**, user name: **metliffeap** and password: **eap**.

The EAP is strictly confidential and is designed to safeguard an employee's privacy and rights. Contacts to and information given to the EAP counselor may be released to the Company only if requested by the employee in writing. There is no cost for an employee to consult with an EAP counselor. If further counseling is necessary, the EAP counselor will outline community and private services available. The counselor will also let employees know whether any costs associated with private services may be covered by their health insurance plan. Costs that are not covered are the responsibility of the employee.

## **Employee Referral Program**

The Company is always searching for the most talented, quality people to join the organization. As an incentive and gratitude for referring quality candidates who are hired as employees, the Company will pay a referral bonus of \$1000.00 to the referring employee after the candidate they referred completes 90 days of employment. The bonus would be included as taxable wages and would be paid on the first paycheck thereafter.

Supervisors are not eligible for this referral bonus when the candidate would be employed in a subordinate role. It is preferred that all referred candidates apply through the employee portal accessed through the Company's Career Websites. The referred applicant **must** indicate the referring employee during the onboarding process. Failure to identify referring employee during the onboarding process may result in ineligibility for referral bonus.

To be eligible to receive the referral bonus, the referring employee must still be employed by the Company at the time the bonus would be payable.

### **Conclusion**

This Employee Handbook was created to present the Company's employment policies and benefits on a generalized scale. It is impossible for this manual to cover every situation or every law, and we encourage you to make your supervisor your first resource for any questions or concerns you may have regarding duties, performance, policies, and practices. If you have any questions or need further clarification, contact a member of the Human Resources Department. We welcome you and look forward to working together as part of our team.



# EMPLOYEE ACKNOWLEDGMENT AND AGREEMENT

By signing below, I acknowledge that I have received a copy of the Bridge Investment Group LLC; Bridge Property Management, LC; and Bridge Commercial Real Estate LLC (hereinafter referred to individually and/or collectively as the “Company”) Employee Handbook and I will familiarize myself with its guidelines.

1. I acknowledge that nothing in the Employee Handbook creates or is intended to create a promise or representation of continued employment or any other contractual rights or obligations, and that my employment, position, and compensation at the Company are at-will, shall be for no specific duration, and may be changed or terminated at the will of the Company. Both the Company and I have the right to terminate my employment at any time, with or without cause or notice. By signing below, I certify that I understand that employment at-will is the sole and entire agreement between myself and the Company concerning the duration of my employment and the circumstances under which my employment may be terminated. It supersedes all prior agreements, understandings, and representations (whether written or oral) concerning the duration of my employment with the Company and/or the circumstances under which my employment may be terminated.

2. This is the entire agreement between myself and the Company regarding the length of my employment, and the reasons for termination of my employment, and this agreement supersedes any and all prior agreements regarding these issues. Oral representations or agreements made before or after employment do not alter this Agreement.

3. If any term or provision, or portion of this Agreement is declared void or unenforceable it shall be severed, and the remainder of this Agreement shall be enforceable.

MY SIGNATURE BELOW ATTESTS TO THE FACT THAT I HAVE READ, UNDERSTAND, AND AGREE TO BE LEGALLY BOUND TO ALL OF THE ABOVE TERMS.

DO NOT SIGN UNTIL YOU HAVE READ THE ABOVE ACKNOWLEDGMENT AND AGREEMENT.

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Signature

---

Print Full Name

---

Date

[RETAIN IN EMPLOYEE PERSONNEL FILE]



# Information Security Policy

2022 V3.0

## History

Version	Date	Author	Modifications
1.0	9/5/2017	BP	First Revision
1.1	2/9/2018	KH	Second Revision
2.0	4/30/2019	SC	Updated to reflect changes in control environment and procedures
2.1	9/5/2019	SC	Verified governance committee outline
2.5	10/13/2020	SC	2021 Revision. Spelling and grammatical changes. Added detail to highlight training. Updated Oversight section.
3.0	1/25/2022	SC/JF	Edits made to reflect addition of Single Family Rental Vertical.

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# INFORMATION SECURITY MISSION STATEMENT

Bridge Investment Group Holdings LLC and its affiliates (“Bridge” or the “Firm”) and Bridge employees have an inherent responsibility to protect the physical and/or digital information assets as well as confidential member data and intellectual capital owned by the company. These critical assets must be safeguarded to mitigate any potential impacts to Bridge and Bridge’s partners and affiliates. Information Security at Bridge is a critical business function that should be incorporated into all aspects of Bridge’s business practices and operations.

To achieve this objective, policies, procedures and standards have been created to ensure secure business practices are in place at Bridge. Information security is a foundational business practice that must be incorporated into planning, development, operations, administration, sales and marketing, as each of these business functions requires specific safeguards to be in place to mitigate the risk associated with normal business activities.

Bridge is subject to numerous State and Federal Information Security and Privacy laws and regulations, which if not complied with, could potentially result in fines, audits, reputational harm, and direct financial impacts to the company. Compliance with all applicable regulations is the responsibility of every employee at Bridge.

## PURPOSE

The implementation of this policy is important to maintain and demonstrate our capability and integrity in dealing with our customers, vendors, and suppliers. Therefore, the design of this policy helps to ensure that:

- Information is protected against unauthorized access;
- Confidentiality of information is maintained;
- Information is not disclosed to unauthorized entities through deliberate or careless action;
- Information integrity is maintained to prevent unauthorized modification;
- Information is available to authorized users when needed;
- Contractual, regulatory, and legislative requirements are met;
- Business continuity plans are produced, maintained, and tested in accordance with management expectations;
- Information security training is given to all employees; and,
- All potential breaches of information security and suspected weaknesses are reported and investigated.
- Achievement of the goals and objectives requires that:
  - Each individual has an adequate understanding of their role and responsibility with regard to information security and the overall organization mission;
  - Bridge policy, procedure, and practices are effectively communicated to the appropriate parties; and,

- Each individual has adequate knowledge of management, operational, and technical controls that help protect Bridge Information Technology resources and assets.
- Each individual is provided Cyber Security and Data Handling training.

## APPLICABILITY

All Bridge employees and external parties identified and authorized to support Bridge are expected to comply with this Information Security Policy (“Policy”) and with the governing roles that implements this Policy. Failure to comply with this Policy will result in serious disciplinary action, such as a loss of access privileges up to and including termination of employment. All staff and relevant external parties will receive information security education and awareness training in accordance with the Human Resources onboarding/hiring procedures and annual training procedures.

## OVERSIGHT

Assignment of security responsibilities

Governance	Role/Title
Policies and Procedures	CCO, CTO
Risk Management	CCO, COO, CEO, CLO
Security Awareness	CCO, HR
Data Management	CCO
Change Management	CTO
Identity and Access Management	CTO
Asset Management	CTO
Vendor Management	CTO, Accounting, CCO
Network Management	CTO
Employee Management	HR

Chairman: Robert  
Morse  
CEO: Jonathan  
Slager

COO: Adam O’Farrell  
Chief Compliance Officer: Jared Forsgren  
Managing Director, Chief Technology Officer: Scott Cardenas  
Managing Director of HR: Pipier Bewlay

### Compliance Requirements

Annual meetings are conducted with Bridge IT and the Compliance team to review regulatory matters, existing process and controls, and potential new topics.

# SECURITY POLICY

## Policy Objective

Executive management of Bridge is committed to preserving the confidentiality, integrity, and availability of all information systems and applications (“System Assets”), as well as any sensitive client, employee, or Firm information stored, transmitted, or processed within the Firm’s information processing facilities or by third parties on behalf of the Firm. Bridge assigns the highest organizational priority to the protection of System Assets and ensures that the Firm’s information security strategy continues to align with the goals of the Firm and its clients.

### *Policy Management*

IT Policies and procedures are managed by the Chief Technology Officer (CTO). Department policies and procedures are developed internally and then submitted to the CTO for committee review and approval.

All Bridge policies and procedures are accessible to employees through the Bridge intranet. Employees have access to procedures related to their job responsibility. Employees are trained on Bridge information security policies upon hiring through the SABA application.

## Identity and Access Management

### *Non-Console Administrative Access*

Bridge restricts remote access to internal devices to authorized personnel. Access to internal devices requires two-factor authentication, elevated privilege permissions, and authorization on local devices for non-console/remote access. Remote access sessions are encrypted.

### *Role-Based Access*

Bridge assigns access to internal resources based upon job role and responsibilities. Bridge access is based upon least access required to perform job duties. Non-Bridge personnel will not be granted access to internal resources except in limited circumstances with approval of the Chief Technology Officer.

## Password Management

Bridge uses Active Directory (“AD”) for network access. The AD global policy enforces password parameters for:

- Password history: 24
- Maximum password age: 90 days
- Minimum password age: 1 days
- Minimum password length: 12 characters

Bridge corporate uses Office 365 (“O365”) which requires two-factor authentication. Employees are provisioned to O365 and then required to set up their password and second verification method (phone or email) where an approval request is received. Employees are prohibited from sharing passwords with anyone.



### *Access Requests*

New employees are processed through the Human Resource onboarding process to notify IT of a new employee and the required access to internal systems/applications. Access requests are based upon employee job role and responsibility.

### *Employee Access Change*

An employee or their manager will submit a request for changes to access using the internal Service Desk email ([servicedesk@bridgeig.com](mailto:servicedesk@bridgeig.com)). IT will review the request. Any excessive or elevated privileges are validated by the IT with the employee's manager to ensure access is appropriate.

### *Terminated Employee*

Human resource or the employee's manager will submit a request to disable/remove the employee's access using the internal Service Desk email ([servicedesk@bridgeig.com](mailto:servicedesk@bridgeig.com)). The Human Resources terminated employee checklist will also provide a notification to IT.

### *Inactive Accounts*

AD and O365 have "password disable" settings for any accounts not logged in the past 90 days. The "password disable" feature requires users to initiate a new password.

### *Lock out after invalid access attempts*

AD and O365 have "account lockout" settings after 3 bad attempts. With two-factor validation, there is no access enabled if validation is not obtained.

### *Idle session timeout*

If a session has been idle for more than 15 minutes, the user is required to re-authenticate to re-activate the terminal or session.

### *Remote access*

Authorized employees may access the system from the Internet through the use of VPN technology. Employees are authenticated through the use of a token-based two-factor authentication system.

## ASSET MANAGEMENT

Bridge manages hardware and software using native tools to detect and update inventory. New devices are added to Bridge's inventory as part of the technical operation support procedure.

Devices are assessed to ensure compatibility of security and functional requirements. Once approved, devices are installed, configured, and added to the Asset management inventory.

Bridge offices have discoverable software to detect new devices on the network. Unauthorized devices are blocked.

Bridge uses vendor managed software for core applications. These assets are tracked in Yard and are part of the vendor management procedures.

### *Data disposal*

Decommissioned assets are recycled. During that process all Bridge data is removed via destruction of the hard drive. A certificate of destruction from our vendor is obtained and archived.

## Vendor Management

Bridge manages vendors, third parties, and contractors using the following department procedures:

- New services or application needs are researched by the department.
- Bridge uses vendor managed software to retain vendor/third-party data.
- Should a vendor process or retain customer information, additional review of vendor information security controls is performed.

## CHANGE MANAGEMENT

Bridge does not develop applications internally. Bridge manages changes related to:

- Provisioning resources
- Cloud and on-premise server patch management
- Updates to anti-virus
- Vendor support as needed to update applications

### *Change Requests and Processing*

Development, changes, upgrades, or disable/remove requests are captured in our Change Management tool, ServiceNow. The Change Manager reviews and facilitates a weekly Change Advisory Board (“CAB”) meeting and coordinates potential emergency change requests.

- Change requests are reviewed and assigned to staff for processing.
- Weekly the Change Advisory Board meets to review change requests and completed changes ready to be applied.

## RISK MANAGEMENT/SYSTEMS SECURITY

### Anti-virus

Bridge installs anti-virus software on all endpoints, servers, and devices that access internal systems. Anti-virus updates are pushed to all endpoints, servers and devices that connect to internal systems.

### *Vulnerability Scan*

At least quarterly, vulnerability scans are performed on all internal systems. Identified vulnerabilities are remediated following change management procedures.

### Penetration testing

At least annually, Bridge performs an external and internal penetration test to validate boundary controls. In addition, at least quarterly, vulnerability scans are performed.

## Intrusion detection/Intrusion prevention

Bridge has implemented intrusion detection (“IDS”) or intrusion prevention (“IPS”) to detect and/or prevent intrusions into the network. An online Azure security dashboard provides nearreal-time updates on all platform and infrastructure security settings.

## Security patches

The CAB reviews all security patch notices to determine requirements to update hardware or firmware. The Director of IT assigns staff to process security patches as part of daily operations support management. Security patches are reviewed, tested and then processed to updated devices.

### *Logging*

The syslog data from our infrastructure environment is processed via a third-party Security Operations Center provider.

### *Incident Management*

Bridge follows a defined escalation process for any incidents. This is defined by the Security Incident Response Policy and the Incident Response Plan.

### *Security awareness training*

Bridge Human Resources performs security awareness training quarterly using SABA, a third-party, internally managed online learning application. Employees are provided initial policy training upon hiring. Annually, SABA is updated for all information security and HR policies training for all employees. Tracking of employee completion is tracked in SABA and hiring managers are provided access to employee training scores/completion information. In addition, there is a required annual Security awareness refresher course. Ongoing phishing campaigns are initiated and follow up training is required, should a user click on a link.

# RISK MANAGEMENT/NETWORK SECURITY

## Network administration

### Testing Network Connections

All changes to network connections, firewalls, and routers are approved using Bridge’s standard change management process. Network connections, firewall, and router changes shall be in accordance with applicable regulatory and statutory compliance requirements.

## Network Diagram Connections

Network diagrams are to be kept current and must identify all connections between the Bridge network and other networks, including any wireless networks.

### *Firewall and Router Configurations*

Firewall and router configurations follow secure standards. Network architecture identifies Demilitarized Zones (“DMZ”) and network segmentation to reduce the likelihood of compromise.

# RISK MANAGEMENT/DATA SECURITY / PERSONAL IDENTIFIABLE INFORMATION

## Data in Transit

Bridge establishes secure transmissions using SSL/Transport Layer Security to encrypt data transmissions and email exchanges.

## Data Encryption

Data classified as confidential is encrypted at rest.

## Data Loss Prevention

Bridge has enabled email filters that identify messages coming from external IP sources to further reduce the likelihood of internal employees providing information via email to unauthorized sources. Business users store data using online applications which encrypt data in transit.

## Clean Desk Policy

Bridge open spaces including desks and printers are required to be free of sensitive or confidential data in case the employee is away from their desk for longer than five minutes. In the event an employee is working remotely, including at their home or in an office space shared with non-Bridge personnel, the Bridge employee is responsible for keeping Bridge information secure, including but not limited to locking their computer or other device when not present and destroying or locking up any files containing sensitive or confidential data.

## Data Disposal

Data classified with a retention date is purged based up that date.

## Media Management

Bridge restricts users from utilizing removable media such as USB devices.

# RISK MANAGEMENT/BUSINESS CONTINUITY

The Bridge online cloud platform and infrastructure are part of high-availability configurations.

# RISK MANAGEMENT/PHYSICAL SECURITY

The Bridge offices have designated reception areas. The reception area is attended by a receptionist during business hours. Access to the reception area is accessible from 8am to 5pm on business days and is locked at all other times. Access beyond the reception area is controlled through the card-key access system. For offices shared with non-Bridge personnel, when the Bridge employee is not present, devices

must be locked and password protected and files containing sensitive or confidential Bridge data must be destroyed or locked

All remaining exterior ingress doors are restricted to users possessing an access card that has been assigned access for their specific location. Access is restricted through the use of access control lists. Employees are granted access cards upon hire.

Visitors check in with the receptionist in the reception area. The visitor's name, employer, and purpose for visit are recorded in a visitor log. The visitor is escorted by an employee at all times.

Upon an employee's termination, the employee's supervisor creates an "access deletion request" which includes the date of termination. This request is routed to the access administrators to deprovision access of all systems/software the employee used. In addition, terminated employees turn over their access cards/IDs during their exit interview.

## Visitor Logs

The visitor's log will record the name of the individual, company whom they represent, and the Bridge employee they are visiting. Visitor logs are scanned and retained for one year.

Visitor logs must include:

- Name of visitor
- Company represented (if applicable)
- Date and approximate time of visit (please note if the visit will occur over multiple days or times)
- Name of onsite personnel authorizing physical access
- Purpose of visit (meeting, service request, personal, etc.)