



Glen Eagle

Employee Handbook

03/21/2023

HANDBOOK DISCLAIMER

We prepared this handbook to help employees find the answers to many questions that they may have regarding their employment with Glen Eagle. Please take the necessary time to read it.

We do not expect this handbook to answer all questions. Members of Management also serve as a major source of information.

Neither this handbook nor any other verbal or written communication by a management representative is, nor should it be considered to be, an agreement, contract of employment, express or implied, or a promise of treatment in any particular manner in any given situation, nor does it confer any contractual rights whatsoever. Glen Eagle adheres to the policy of employment at will, which permits Glen Eagle or the employee to end the employment relationship at any time, for any reason, with or without cause or notice.

No Glen Eagle representative other than Susan Michel (CEO), Robert Michel (COO), or Carol Ann Fernandez (COO) may modify at-will status and/or provide any special arrangement concerning terms or conditions of employment in an individual case or generally and any such modification must be in a signed writing.

Many matters covered by this handbook, such as benefit plan descriptions, are also described in separate Glen Eagle documents. These Glen Eagle documents are always controlling over any statement made in this handbook or by any member of management.

This handbook states only general Glen Eagle guidelines. Glen Eagle may, at any time, in its sole discretion, modify or vary from anything stated in this handbook, with or without notice, except for the rights of the parties to end employment at will, which may only be modified by an express written agreement signed by the employee and Susan Michel (CEO), Robert Michel (COO), or Carol Ann Fernandez (COO).

This handbook supersedes all prior handbooks.

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Section 1 - Governing Principles of Employment

1-1. Introduction

For employees who are commencing employment with Glen Eagle Advisors, LLC ("Glen Eagle Advisors, LLC", "Glen Eagle Wealth", or "Glen Eagle"), on behalf of Glen Eagle, let me extend a warm and sincere welcome.

For employees who have been with us, thanks for your past and continued service.

I extend my personal best wishes for success and happiness here at Glen Eagle. We understand that it is our employees who provide the services that our customers rely upon, and who will enable us to create new opportunities in the years to come.

Susan Michel, CEO

1-2. Equal Employment Opportunity

Glen Eagle is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances. Glen Eagle's management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs and general treatment during employment.

Glen Eagle will endeavor to make a reasonable accommodation of an otherwise qualified applicant or employee related to an individual's: physical or mental disability; sincerely held religious beliefs and practices; and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon Glen Eagle's business operations.

Any applicant or employee who needs an accommodation in order to perform the essential functions of the job should contact Laura Hurd and/or Carol Ann Fernandez (COO) to request such an accommodation. The individual should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. Glen Eagle then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made. Glen Eagle will evaluate requested accommodations, and as appropriate, identify other possible accommodations, if any.

The individual will be notified of Glen Eagle's decision regarding the request within a reasonable period. Glen Eagle treats all medical information submitted as part of the accommodation process in a confidential manner.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of Laura Hurd and/or Carol Ann Fernandez (COO). Glen Eagle will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If employees feel they have been subjected to any such retaliation, they should contact Laura Hurd and/or Carol Ann Fernandez (COO). To ensure our workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations conducted pursuant to this policy.

1-3. Non-Harassment

It is Glen Eagle's policy to prohibit intentional and unintentional harassment of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). Such conduct will not be tolerated by Glen Eagle.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one harasses another individual in the workplace, including while on Glen Eagle premises, while on Glen Eagle business (whether or not on Glen Eagle premises) or while representing Glen Eagle. In addition to being a violation of this policy, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws are unlawful.

Harassment Defined

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

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing),

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

Sexual Harassment Defined

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

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

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault, blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;
4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
5. propositions or suggestive or insulting comments of a sexual nature;
6. derogatory cartoons, posters and drawings;
7. sexually-explicit e-mails, text messages or voicemails;
8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual; and
12. teasing or other conduct directed toward a person because of the person's gender.

Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to Laura Hurd. If the employee is

unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact Carol Ann Fernandez (COO). If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. All employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, Glen Eagle will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

1-4. Drug-Free and Alcohol-Free Workplace

To help ensure a safe, healthy and productive work environment for our employees and others, to protect Glen Eagle property, and to ensure efficient operations, Glen Eagle has adopted a policy of maintaining a workplace free of drugs and alcohol. This policy applies to all employees and other individuals who perform work for Glen Eagle.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances, drug paraphernalia or alcohol by an individual anywhere on Glen Eagle premises, while on Glen Eagle business (whether or not on Glen Eagle premises) or while representing Glen Eagle, is strictly prohibited. Employees and other individuals who work for Glen Eagle also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances, which may impact the employee's ability to perform their job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work. However, this does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a positive drug test, to the extent the employee is subject to any drug testing requirement, to the extent permitted by and in accordance with applicable state law. This restriction does not apply to responsible drinking of alcohol at business meetings and related social outings.

Violation of this policy will result in disciplinary action, up to and including discharge.

Glen Eagle maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. However, employees may not request an accommodation to avoid discipline for a policy violation. We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs, or jeopardizes the health and safety of any Glen Eagle employee, including themselves.

1-5. Workplace Violence

Glen Eagle is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Glen Eagle and personal property.

Glen Eagle does not expect employees to become experts in psychology or to physically subdue a threatening or violent individual. Indeed, Glen Eagle specifically discourages employees from engaging in any physical confrontation with a violent or potentially violent individual. However, Glen Eagle does expect and encourage employees to exercise reasonable judgment in identifying potentially dangerous situations.

Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any Glen Eagle employee will not be tolerated. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons onto Glen Eagle premises.

Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom the employee feels comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede Glen Eagle's ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If Glen Eagle determines, after an appropriate good faith investigation, that someone has violated this policy, Glen Eagle will take swift and appropriate corrective action.

If the employee is the recipient of a threat made by an outside party, that employee should follow the steps detailed in this section. It is important for Glen Eagle to be aware of any potential danger in its offices. Indeed, Glen Eagle wants to take effective measures to protect everyone from the threat of a violent act by employees or by anyone else.

Section 2 - Operational Policies

2-1. Employee Classifications

For purposes of this handbook, all Glen Eagle employees fall within one of the classifications below.

Full-Time Employees - Employees who regularly work at least 40 hours per week who were not hired on a short-term basis.

Part-Time Employees - Employees who regularly work fewer than 40 hours per week who were not hired on a short-term basis.

Short-Term Employees - Employees who were hired for a specific short-term project, or on a short-term freelance, per diem or temporary basis. Short-Term employees generally are not eligible for Glen Eagle benefits, but are eligible to receive statutory benefits.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay; they generally receive the same weekly salary regardless of hours worked. Such salary may be paid less frequently than weekly. The employee will be informed of these classifications upon hire and informed of any subsequent changes to the classifications.

2-2. Your Employment Records

In order to obtain their position, employees have provided personal information, such as address and telephone number. This information is contained in their personnel file.

Employees should keep their personnel file up to date by informing Laura Hurd and/or Carol Ann Fernandez (COO) of any changes. Employees also should inform Laura Hurd and/or Carol Ann Fernandez (COO) of any specialized training or skills they acquire, as well as any changes to any required visas. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach employees in a crisis could cause a severe health or safety risk or other significant problem.

2-3. Working Hours and Schedule

Glen Eagle normally is open for business from Monday through Friday. Employees will be assigned a work schedule and will be expected to begin and end work according to the schedule. To accommodate the needs of the business, at some point Glen Eagle may need to change individual work schedules on either a short-term or long-term basis.

2-4. Remote Work/Telecommuting

Glen Eagle may allow employees to work remotely if their job duties and work performance are determined to be eligible for remote work. Eligibility will be decided on a case-by-case basis by Glen Eagle. Employees also may be required to work remotely during periods of public health emergencies if government orders and mandates recommend such work.

This policy provides general information regarding remote work/telecommuting. Employees who are approved to work remotely should consult their individual agreement for specific details of their remote work/telecommuting arrangement, such as expected work hours, equipment provided, and other important information.

Any remote work/telecommuting arrangement may be discontinued by Glen Eagle at any time and at the discretion of Glen Eagle. Employees also may discontinue the arrangement but may not be guaranteed office space at Glen Eagle's location.

At-Will Employment

This policy and any individual agreement addressing this work arrangement do not create a contract of employment and are not intended to be considered or construed as a promise of continued employment. Employment is at will and may be discontinued at any time by Glen Eagle or employee without notice, cause, or liability.

Hours of Work

Employees will work full time from home. Scheduled hours of work will be set by the employees' manager or supervisor. Employees should maintain regular contact with their supervisors and managers.

Nonexempt employees must accurately record all hours worked pursuant to Glen Eagle's timekeeping system and take rest and meal breaks as if in Glen Eagle's workplace and as required by law. Nonexempt employees may not work beyond scheduled working hours (including working more than 40 hours in a workweek) without prior, written authorization from their manager or supervisor.

Location

Employees will provide, at their expense, a secure, dedicated work area. Employees are

responsible for maintaining the work area in a safe, secure, and nonhazardous condition at all times. Employees will maintain security devices and procedures necessary to prevent use by unauthorized persons, including by preventing the connection of any Glen Eagle-furnished computer system, network, or database to any computer, network, or database other than a computer, network, or database to which connections are provided or authorized by Glen Eagle.

Duties

Employees are expected to follow all existing Glen Eagle policies and procedures. The duties, obligations, responsibilities, and conditions of employment with Glen Eagle remain unchanged. Employees must stay engaged with work throughout the workday and be fully available during normal business hours. If employees do not successfully perform their job duties remotely, this arrangement will be revoked. Employees are expected to follow existing Glen Eagle policies with respect to scheduled and unscheduled time off, including the obligation to speak with their manager or supervisor before the scheduled start time in the event of an unscheduled absence, tardy, or early departure.

Accidents and Injuries

Employees agree to maintain safe conditions in the remote work space and to practice the same safety habits and rules applied on Glen Eagle premises. If employees incur an injury arising out of the course and scope of the assigned job duties while working in the remote work space, the workers' compensation provisions in place for the state in which the employees are working will apply. Employees must notify their supervisor or manager immediately and complete all necessary and/or requested documents regarding the reported injury. Glen Eagle assumes no responsibility for injuries occurring in the remote work space outside normal working hours or for injuries that occur as a result of a reasonably recognizable unsafe remote work space.

Equipment

Employees agree to use electronic equipment that has been encrypted and meets all of Glen Eagle's security requirements. If Glen Eagle provides equipment for home use, employees agree to provide a secure location for Glen Eagle-owned equipment and will not use, or allow others to use, such equipment for purposes other than Glen Eagle business. Employees have no expectation of ownership in such equipment, linkages, property, or other items installed or provided by Glen Eagle. Glen Eagle will bear the expense of removal of any such equipment, linkages, and installations provided by Glen Eagle upon the termination of the remote work/telecommuting arrangement but not modification of or repairs to the work location. Employees hereby release Glen Eagle from any damage or liability incurred in the installing or removal of the equipment provided by Glen Eagle.

Return of Glen Eagle Property

All equipment, records, and materials provided by Glen Eagle will remain Glen Eagle

property. Employees agree to return Glen Eagle equipment, records, and materials upon request. All Glen Eagle equipment will be returned by employees for inspection, repair, or replacement as needed or requested or immediately upon termination of the remote work/telecommuting arrangement. All equipment must be returned within five (5) business days of written notice to the employees.

Expenses

Upon presentment of receipts and in accordance with the Business Expense Reimbursement policy, Glen Eagle will reimburse employees for certain preapproved expenses.

Regular household utility charges, such as electricity, water, phone, Internet service, auto, homeowners' insurance, etc., are not reimbursable unless state law requires reimbursement.

Confidentiality

Employees agree that they are subject to Glen Eagle's policies prohibiting the nonbusiness use or dissemination of Glen Eagle's confidential business information. Employees will take all appropriate steps to safeguard Glen Eagle's confidential business information, including segregating it from personal papers and documents, not allowing nonemployees to access such information, and keeping such information in locked drawers or file cabinets when not in use. Employees will maintain confidential information, including, but not limited to, information regarding Glen Eagle's products or services, processing, marketing and sales, client lists, client e-mail addresses and mailing addresses, client data, orders, memoranda, notes, records, technical data, sketches, designs, plans, drawings, trade secrets, research and development data, experimental work, proposals, new product and/or service developments, project reports, sources of supply and material, operating and cost data, and corporate financial information.

Contact

If employees have any questions concerning this policy or would like to apply to work remotely, they should contact Laura Hurd and/or Carol Ann Fernandez (COO).

2-5. Timekeeping Procedures

Employees must record their actual time worked for payroll and benefit purposes. Non-exempt employees must record the beginning and ending time of any departure from work for any non-work-related reason, on timesheets as prescribed by management.

Altering, falsifying or tampering with time records is prohibited and subjects the employee to discipline, up to and including discharge.

Exempt employees are required to record their daily work attendance and report full days of absence from work for reasons such as leaves of absence, sick leave or personal

business.

Non-exempt employees may not start work until their scheduled starting time.

It is the employee's responsibility to sign time records to certify the accuracy of all time recorded. Any errors in the time record should be reported immediately to Laura Hurd and/or Carol Ann Fernandez (COO), who will attempt to correct legitimate errors.

2-6. Overtime

Like most successful companies, Glen Eagle experiences periods of extremely high activity. During these busy periods, additional work is required from all of us. Supervisors are responsible for monitoring business activity and requesting overtime work if it is necessary. Effort will be made to provide employees with adequate advance notice in such situations.

Any non-exempt employee who works overtime will be compensated at the rate of one and one-half times (1.5) their normal hourly wage for all time worked in excess of 40 hours each week, unless otherwise required by law. Exempt employees are not eligible for overtime.

Employees may work overtime only with prior management authorization.

For purposes of calculating overtime for non-exempt employees, the workweek begins at 12 a.m. on Monday and ends 168 hours later at 12 a.m. on the following Monday.

2-7. Travel Time for Non-Exempt Employees

Overnight, Out-of-Town Trips

Non-exempt employees will be compensated for time spent traveling (except for meal periods) during their normal working hours, on days they are scheduled to work and on unscheduled work days (such as weekends). Non-exempt employees also will be paid for any time spent performing job duties during otherwise non-compensable travel time; however, such work should be limited absent advance management authorization.

Out-of-Town Trips for One Day

Non-exempt employees who travel out of town for a one-day assignment will be paid for all travel time, except for, among other things: time spent traveling between the employee's home and the local railroad, bus or plane terminal; and meal periods.

Local Travel

Non-exempt employees will be compensated for time spent traveling from one job site to another job site during a workday. The trip home, however, is non-compensable when the employee goes directly home from the final job site, unless it is much longer than the regular commute home from the regular worksite. In such case, the portion of

the trip home in excess of the regular commute is compensable.

Commuting Time

Under the Portal to Portal Act, travel from home to work and from work to home is generally non-compensable. However, if a non-exempt employee regularly reports to a worksite near their home, but is required to report to a worksite farther away than the regular worksite, the additional time spent traveling is compensable.

If compensable travel time results in more than 40 hours worked by a non-exempt employee, the employee will be compensated at an overtime rate of one and one-half (1-1/2) times the regular rate.

To the extent that applicable state law provides greater benefits, state law applies.

2-8. Safe Harbor Policy for Exempt Employees

It is Glen Eagle's policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure proper payment and that no improper deductions are made, employees must review pay stubs promptly to identify and report all errors.

Those classified as exempt salaried employees will receive a salary which is intended to compensate them for all hours they may work for Glen Eagle. This salary will be established at the time of hire or classification as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work performed.

Under federal and state law, salary is subject to certain deductions. For example, unless state law requires otherwise, salary can be reduced for the following reasons:

- full-day absences for personal reasons;
- full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing wage replacement benefits for such absences (deductions also may be made for the exempt employee's full-day absences due to sickness or disability before the employee has qualified for the plan, policy or practice or after the employee has exhausted the leave allowance under the plan);
- full-day disciplinary suspensions for infractions of our written policies and procedures;
- Family and Medical Leave Act absences (either full- or partial-day absences);
- to offset amounts received as payment from the court for jury and witness fees or from the military as military pay;
- the first or last week of employment in the event the employee works less than a full week; and
- any full work week in which the employee does not perform any work.

Salary may also be reduced for certain types of deductions such as a portion of health, dental or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a 401(k) or pension plan.

In any work week in which the employee performed any work, salary will not be reduced for any of the following reasons:

- partial day absences for personal reasons, sickness or disability;
- an absence because Glen Eagle has decided to close a facility on a scheduled work day;
- absences for jury duty, attendance as a witness, or military leave in any week in which the employee performed any work (subject to any offsets as set forth above); and
- any other deductions prohibited by state or federal law.

However, unless state law provides otherwise, deductions may be made to accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

If employees believe they have been subject to any improper deductions, they should immediately report the matter to a supervisor. If the supervisor is unavailable or if the employee believes it would be inappropriate to contact that person (or if the employee has not received a prompt and fully acceptable reply), they should immediately contact Finance Department or any other supervisor in Glen Eagle with whom the employee feels comfortable.

2-9. Your Paycheck

Employees will be paid bi-weekly for all the time worked during the past pay period.

Payroll stubs itemize deductions made from gross earnings. By law, Glen Eagle is required to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also may include any court-ordered garnishments. Payroll stubs also will differentiate between regular pay received and overtime pay received.

If there is an error in any employee's pay, the employee should bring the matter to the attention of the Finance Department immediately so Glen Eagle can resolve the matter quickly and amicably.

Paychecks will be given only to the employee, unless the employee requests that they be mailed or authorizes in writing that another person may accept the check.

2-10. Direct Deposit

Glen Eagle strongly encourages employees to use direct deposit. Authorization forms are available from the Finance Department.

2-11. Salary Advances

Glen Eagle does not permit advances on paychecks or against accrued paid time off.

2-12. Performance Review

Depending on the employee's position and classification, Glen Eagle endeavors to review performance annually. However, a positive performance evaluation does not guarantee an increase in salary, a promotion or continued employment. Compensation increases and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of management.

In addition to these formal performance evaluations, Glen Eagle encourages employees and department managers to discuss job performance on a frequent and ongoing basis.

2-13. Record Retention

Glen Eagle acknowledges its responsibility to preserve information relating to litigation, audits and investigations. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against Glen Eagle and its employees and possible disciplinary action against responsible individuals (up to and including discharge of the employee). Each employee has an obligation to contact Susan Michel (CEO) to inform them of potential or actual litigation, external audit, investigation or similar proceeding involving Glen Eagle that may have an impact on record retention protocols.

2-14. Prohibition Against Working Off the Clock

The Glen Eagle is committed to compensating every employee for all work performed. The Glen Eagle prohibits all off the clock work by non-exempt employees and will not tolerate non-exempt employees who work off the clock, or employees who request that non-exempt employees work off the clock. Employees must not perform any work without compensation. No manager may request, require, or permit non-exempt employees to perform work without compensation.

“Work” means any activity that you are required, requested, or permitted to perform in

the interest of the Glen Eagle or for the Glen Eagle's benefit. "Off the clock work" means any work performed when a non-exempt employee's time was not recorded and the employee was not paid for the time worked. Examples of prohibited off the clock work include, but are not limited to, performing any work prior to the start of a scheduled shift, after the conclusion of a scheduled shift, or during an unpaid meal break.

If you perform work while not on your shift, you must keep track of all time worked and immediately report that time to your manager. The Glen Eagle will pay you for all hours worked. If you perform work without properly recording your time, you will be subject to discipline, up to and including termination.

2-15. Inclement Weather Policy

It is Glen Eagle's policy to be open during normal hours of operation. In the event of adverse weather conditions, Susan Michel (CEO) or Robert Michel (COO) may make the decision to close the Glen Eagle. Reasonable efforts will be made to contact employees to notify them of business closings.

If the Glen Eagle remains open, employees are not expected to endanger themselves when traveling to or from work in adverse weather conditions. Attendance during inclement weather should be a matter of individual judgment based on safety and availability of alternative modes of transportation. Common sense must be exercised. In all cases where an employee feels unable to safely make the commute to work, he or she should contact their manager to report this condition before the beginning of their scheduled work hours.

If snow or other inclement weather conditions occur during the business day, Robert Michel (COO) may make the decision to close the Glen Eagle. In addition, an employee may request permission to leave early.

If an employee is unable to make it to work under inclement weather conditions or if an employee leaves work early with the permission of Robert Michel (COO), and the Glen Eagle opens, or remains open, for normal business, the employee will be required to use paid time off.

Section 3 - Benefits

3-1. Benefits Overview

In addition to good working conditions and competitive pay, it is Glen Eagle's policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits include time-off benefits, such as vacations and holidays, and insurance and other plan benefits. We are constantly studying and evaluating our benefits programs and policies to better meet present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

The next few pages contain a brief outline of the benefits programs Glen Eagle provides employees and their families. Of course, the information presented here is intended to serve only as guidelines.

The descriptions of the insurance and other plan benefits merely highlight certain aspects of the applicable plans for general information only. The details of those plans are spelled out in the official plan documents, which are available for review upon request from Laura Hurd and/or Carol Ann Fernandez (COO). Additionally, the provisions of the plans, including eligibility and benefits provisions, are summarized in the summary plan descriptions ("SPDs") for the plans (which may be revised from time to time). In the determination of benefits and all other matters under each plan, the terms of the official plan documents shall govern over the language of any descriptions of the plans, including the SPDs and this handbook.

Further, Glen Eagle (including the officers and administrators who are responsible for administering the plans) retains full discretionary authority to interpret the terms of the plans, as well as full discretionary authority with regard to administrative matters arising in connection with the plans and all issues concerning benefit terms, eligibility and entitlement.

While Glen Eagle intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If employees have any questions regarding benefits, they should contact Laura Hurd and/or Carol Ann Fernandez (COO).

3-2. Paid Holidays

Glen Eagle follows the holiday schedule of the New York Stock Exchange. These can be found on the New York Stock Exchange website at <https://www.nyse.com/>. Full-time employees will be paid for the holidays which generally include:

New Year's Day
Martin Luther King, Jr. Day
President's Day
Good Friday
Memorial Day
Juneteenth
Independence Day
Labor Day
Thanksgiving Day
Christmas Day

When holidays fall or are celebrated on a regular work day, eligible employees will receive one (1) day's pay at their regular straight-time rate. Eligible non-exempt employees who are called in to work on a holiday will receive one (1) day's pay at their regular straight-time rate, and an additional payment of straight-time for the actual time they work that day.

If a holiday falls within an eligible employee's approved vacation period, the eligible employee will be paid for the holiday (at the regular straight-time rate) rather than the vacation day.

3-3. Paid Vacations

Glen Eagle appreciates how hard employees work and recognizes the importance of providing time for rest and relaxation. Glen Eagle fully encourages employees to get this rest by taking vacation time. For the purpose of this policy, the calendar year runs from January 1st through December 31st.

Full-time employees accrue paid vacation time as follows:

During the first partial calendar year of employment and the first five (5) full calendar years of employment, full-time employees accrue up to fifteen (15) days of vacation per year. Employees will begin accruing paid vacation after their 90th calendar day of employment. Vacation is accrued on a pro-rata basis throughout the year.

Thereafter, full-time employees accrue up to twenty (20) days of vacation per year. Vacation is accrued on a pro-rata basis throughout the year.

Vacations should be taken during the year accrued, unless otherwise required by law.

Every effort will be made to grant employees' vacation preference, consistent with operating schedules. However, if too many people request the same period of time off, Glen Eagle reserves the right to choose who may take vacation during that period. Vacation requests must be submitted to the Executive Assistant to the CEO at least two (2) weeks in advance of the requested vacation dates.

Accrued, unused vacation is not paid out upon separation.

Paid vacation time hours are not considered hours worked for the purpose of calculating overtime.

3-4. Lactation Breaks

Glen Eagle will provide a reasonable amount of break time to accommodate employees desiring to express breast milk for their infant child, in accordance with and to the extent required by applicable law. The break time, if possible, must run concurrently with rest and meal periods already provided. If the break time cannot run concurrently with rest and meal periods already provided, the break time will be unpaid, subject to applicable law.

Glen Eagle will make reasonable efforts to provide employees with the use of a room or location other than a toilet stall to express milk in private. This location may be the employee's private office, if applicable. Glen Eagle may not be able to provide additional break time if doing so would seriously disrupt Glen Eagle's operations, subject to applicable law. Please consult Laura Hurd and/or Carol Ann Fernandez (COO) with questions regarding this policy.

Employees should advise management if they need break time and an area for this purpose. Employees will not be discriminated against or retaliated against for exercising their rights under this policy.

3-5. Workers' Compensation

On-the-job injuries are covered by Glen Eagle's Workers' Compensation Insurance Policy, which is provided at no cost. If employees are injured on the job, no matter how slightly, they should report the incident immediately to their supervisor. Failure to follow Glen Eagle procedures may affect the ability of employees to receive Workers Compensation benefits.

This is solely a monetary benefit and not a leave of absence entitlement. Employees who need to miss work due to a workplace injury must also request a formal leave of absence. See the Leave of Absence sections of this handbook for more information.

3-6. Jury Duty

Glen Eagle realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. Employees are expected, however, to provide proper notice of a request to perform jury duty and verification of their service.

Employees also are expected to keep management informed of the expected length of

jury duty service and to report to work for the major portion of the day if excused by the court. If the required absence presents a serious conflict for management, employees may be asked to try to postpone jury duty.

Employees on jury duty leave will be paid for their jury duty service in accordance with state law; however, exempt employees will be paid their full salary for any week in which time is missed due to jury duty if work is performed for Glen Eagle during such week.

3-7. Bereavement Leave

The death of a family member is a time when employees wish to be with their families. If the employee is full-time and loses a close relative, the employee will be allowed paid time off of up to three (3) days to assist in attending to obligations and commitments. For the purposes of this policy, a close relative includes a spouse, domestic/civil union partner, child, parent, sibling, or any other relation required by applicable law. Paid leave days only may be taken on regularly scheduled, consecutive workdays following the day of death. Employees must inform their supervisor prior to commencing bereavement leave. In administering this policy, Glen Eagle may require verification of death.

3-8. Insurance Programs

Full-time and eligible part-time employees may participate in Glen Eagle's insurance programs after completing ninety (90) days of employment. Under these plans, eligible employees will receive comprehensive health and other insurance coverage for themselves and their families, as well as other benefits.

Upon becoming eligible to participate in these plans, employees will receive summary plan descriptions (SPDs) describing the benefits in greater detail. Please refer to the SPDs for detailed plan information. Of course, feel free to contact Laura Hurd and/or Carol Ann Fernandez (COO) with any further questions.

3-9. Retirement Plan

Eligible employees are able to participate in Glen Eagle's retirement plan. Plan participants may make pre-tax contributions or roth contributions to a retirement account.

Upon becoming eligible to participate in this plan, employees will receive an SPD describing the plan in greater detail. Please refer to the SPD for detailed plan information. Of course, feel free to speak to Laura Hurd and/or Carol Ann Fernandez (COO) if there are any further questions.

Section 4 - Leaves of Absence

4-1. Personal Leave

If employees are ineligible for any other Glen Eagle leave of absence, Glen Eagle, under certain circumstances, may grant a personal leave of absence without pay. A written request for a personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and employees are not eligible for leave under any state leave law, medical certification also must be submitted. The request will be considered on the basis of staffing requirements and the reasons for the requested leave, as well as performance and attendance records. Normally, a leave of absence will be granted for a period of up to four (4) weeks. However a personal leave may be extended if, prior to the end of leave, employees submit a written request for an extension to management and the request is granted. During the leave, employees will not earn vacation or sick days. Glen Eagle will continue health insurance coverage during the leave if employees submit their share of the monthly premium payments to Glen Eagle in a timely manner, subject to the terms of the plan documents.

When the employees anticipate returning to work, they should notify management of the expected return date. This notification should be made at least one (1) week before the end of the leave.

Upon completion of the personal leave of absence, Glen Eagle will attempt to return employees to their original job or a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of availability to return to work, failure to return to work when notified or a continued absence from work beyond the time approved by Glen Eagle will be considered a voluntary resignation of employment.

4-2. Military Leave

If employees are called into active military service or enlist in the uniformed services, they will be eligible to receive an unpaid military leave of absence. To be eligible for military leave, employees must provide management with advance notice of service obligations unless they are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable to provide such notice. Provided the absence does not exceed applicable statutory limitations, employees will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws. Employees should ask management for further information about eligibility for Military Leave.

If employees are required to attend yearly Reserves or National Guard duty, they can

apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by law (including travel). They should give management as much advance notice of their need for military leave as possible so that Glen Eagle can maintain proper coverage while employees are away.

Section 5 - General Standards of Conduct

5-1. Workplace Conduct

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

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

1. Obtaining employment on the basis of false or misleading information.
2. Stealing, removing or defacing Glen Eagle property or a co-worker's property, and/or disclosure of confidential information.
3. Completing another employee's time records.
4. Violation of safety rules and policies.
5. Violation of Glen Eagle's Drug and Alcohol-Free Workplace Policy.
6. Fighting, threatening or disrupting the work of others or other violations of Glen Eagle's Workplace Violence Policy.
7. Failure to follow lawful instructions of a supervisor.
8. Failure to perform assigned job duties.
9. Violation of the Punctuality and Attendance Policy, including but not limited to irregular attendance, habitual lateness or unexcused absences.
10. Gambling on Glen Eagle property.
11. Willful or careless destruction or damage to Glen Eagle assets or to the equipment or possessions of another employee.
12. Wasting work materials.
13. Performing work of a personal nature during working time.
14. Violation of the Solicitation and Distribution Policy.
15. Violation of Glen Eagle's Harassment or Equal Employment Opportunity Policies.
16. Violation of the Communication and Computer Systems Policy.
17. Unsatisfactory job performance.
18. Any other violation of Glen Eagle policy.

Obviously, not every type of misconduct can be listed. Note that all employees are employed at-will, and Glen Eagle reserves the right to impose whatever discipline it chooses, or none at all, in a particular instance. The Glen Eagle will deal with each situation individually and nothing in this handbook should be construed as a promise of specific treatment in a given situation.

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

5-2. Punctuality and Attendance

Employees are hired to perform important functions at Glen Eagle. As with any group effort, operating effectively takes cooperation and commitment from everyone. Therefore, attendance and punctuality are very important. Unnecessary absences and lateness are expensive, disruptive and place an unfair burden on fellow employees and management. We expect excellent attendance from all employees. Excessive absenteeism or tardiness will result in disciplinary action up to and including discharge.

We do recognize, however, there are times when absences and tardiness cannot be avoided. In such cases, employees are expected to notify management as early as possible, but no later than the start of the work day. Asking another employee, friend or relative to give this notice is improper and constitutes grounds for disciplinary action. Employees should call, stating the nature of the illness and its expected duration, for every day of absenteeism.

Unreported absences of five (5) consecutive work days generally will be considered a voluntary resignation of employment with Glen Eagle.

5-3. Use of Communications and Computer Systems

Glen Eagle's communication and computer systems are intended for business purposes only. This includes voicemail, e-mail, and internet systems. Users have no legitimate expectation of privacy in regard to their use of Glen Eagle systems.

Glen Eagle may access voicemail and e-mail systems and obtain the communications within the systems, including past voicemail and e-mail messages, without notice to users of the system, in the ordinary course of business when Glen Eagle deems it appropriate to do so. The reasons for which Glen Eagle may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Glen Eagle operations continue appropriately during the employee's absence.

Further, Glen Eagle may review internet usage to ensure that such use with Glen Eagle property, or communications sent via the internet with Glen Eagle property, are appropriate. The reasons for which Glen Eagle may review employees' use of the internet with Glen Eagle property include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Glen Eagle operations continue appropriately during the employee's absence.

Glen Eagle may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

Glen Eagle's policies prohibiting harassment, in their entirety, apply to the use of Glen Eagle's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since Glen Eagle's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords.

Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

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

Violators of this policy may be subject to disciplinary action, up to and including discharge.

5-4. Use of Social Media

Glen Eagle respects the right of any employee to maintain a blog or web page or to participate in social networking, including but not limited to Facebook, Instagram, Twitter, and LinkedIn. However, to protect Glen Eagle interests and ensure employees focus on their job duties, employees must adhere to the following rules:

Employees may not post on a blog or web page or participate on a social networking platform, such as Facebook, Instagram, Twitter, and LinkedIn, during work time or at any time with Glen Eagle equipment or property.

All rules regarding confidential and proprietary business information apply in full to blogs, web pages and social networking platforms, such as Facebook, Instagram, Twitter, LinkedIn, or similar sites. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed in a blog, web page or social networking site.

Whether the employees are posting something on their own blog, web page, social networking, Facebook, Instagram, Twitter, and LinkedIn or on someone else's, if the employee mentions Glen Eagle and also expresses either a political opinion or an opinion regarding Glen Eagle's actions that could pose an actual or potential conflict of interest with Glen Eagle, the poster must include a disclaimer. The poster should specifically state that the opinion expressed is his/her personal opinion and not Glen Eagle's position. This is necessary to preserve Glen Eagle's good will in the marketplace.

Any conduct that is impermissible under the law if expressed in any other form or forum is impermissible if expressed through a blog, web page, social networking, Facebook, Instagram, Twitter, LinkedIn, or similar site. For example, posted material that is discriminatory, obscene, defamatory, libelous or violent is forbidden. Glen Eagle policies apply equally to employee social media usage.

Glen Eagle encourages all employees to keep in mind the speed and manner in which information posted on a blog, web page, and/or social networking site is received and often misunderstood by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including discharge.

5-5. Personal Portable Communication Devices

Some employees may be authorized to use their own PCD for business purposes. These employees should work with Robert Michel (COO) to configure their PCD for business use. Communications sent via a personal PCD also may subject to monitoring if sent through the Glen Eagle's networks and the PCD must be provided for inspection and review upon request.

All conversations, text messages and e-mails must be professional. When sending a text message or using a PCD for business purposes, employees must comply with applicable Glen Eagle guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles.

If an employee who uses a personal PCD for business resigns or is discharged, the employee will be required to submit the device to Robert Michel (COO) for resetting on or before his or her last day of work. At that time, Robert Michel (COO) will reset and remove all information from the device, including but not limited to, Glen Eagle information and personal data (such as contacts, e-mails and photographs). The Glen Eagle will make efforts to provide employees with the personal data in another form (e.g., on a disk) to the extent practicable; however, the employee may lose some or all personal data saved on the device.

Employees may not use their personal PCD for business unless they agree to submit the device to Robert Michel (COO) on or before their last day of work for resetting and removal of Glen Eagle information. This is the only way currently possible to ensure that all Glen Eagle information is removed from the device at the time of termination. The removal of Glen Eagle information is crucial to ensure compliance with the Glen Eagle's confidentiality and proprietary information policies and objectives.

Please note that whether employees use their personal PCD, the Glen Eagle's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.

Portable Communication Device Use While Driving



Glen Eagle

Employees who drive on Glen Eagle business must abide by all state or local laws prohibiting or limiting PCD (cell phone or personal digital assistant) use while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employee is driving, and permitted by law, the employee must use a hands-free option and advise the caller that he/she is unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a cell phone while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

5-6. Camera Phones/Recording Devices

Due to the potential for issues such as invasion of privacy, sexual harassment and loss of productivity, as well as inappropriate disclosure of confidential information, no employee may use a camera phone function on any phone on Glen Eagle property or while performing work for Glen Eagle.

The use of tape recorders, Dictaphones or other types of voice recording devices anywhere on Glen Eagle property, including to record conversations or activities of other employees or management, or while performing work for Glen Eagle, is also strictly prohibited, unless the device was provided to you by Glen Eagle and is used solely for legitimate business purposes.

5-7. Inspections

Glen Eagle reserves the right to require employees while on Glen Eagle property, or on client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Glen Eagle or client property, and work areas. This includes lockers, vehicles, desks, cabinets, work stations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to Glen Eagle or to its clients. Employees are expected to cooperate in the conduct of any search or inspection.

5-8. No Smoking

Smoking, including the use of e-cigarettes, is prohibited on Glen Eagle premises and in all Glen Eagle vehicles.

5-9. Solicitation and Distribution

To avoid distractions, solicitation by the employee of another employee is prohibited while either employee is on work time. "Work time" is defined as the time the employee is engaged, or should be engaged, in performing his/her work tasks for Glen Eagle. Solicitation of any kind by non-employees on Glen Eagle premises is prohibited at all times.

Distribution of advertising material, handbills, printed or written literature of any kind in working areas of Glen Eagle is prohibited at all times. Distribution of literature by non-employees on Glen Eagle premises is prohibited at all times.

5-10. Important Notices

Important notices and items of general interest are continually posted in Glen Eagle's work room. Employees should make it a practice to review the notices frequently. This will assist employees in keeping up with what is current at Glen Eagle. To avoid confusion, employees should not post or remove any material from the work room.

5-11. Confidential Company Information

During the course of work, employees may become aware of confidential information about Glen Eagle's business, including but not limited to information regarding Glen Eagle finances, pricing, products and new product development, software and computer programs, marketing strategies, suppliers and customers and potential customers. Employees also may become aware of similar confidential information belonging to Glen Eagle's clients. It is extremely important that all such information remain confidential, and particularly not be disclosed to Glen Eagle's competitors. Any employee who improperly copies, removes (whether physically or electronically), uses or discloses confidential information to anyone outside of Glen Eagle may be subject to disciplinary action up to and including termination. Employees may be required to sign an agreement reiterating these obligations.

5-12. Conflict of Interest and Business Ethics

It is Glen Eagle's policy that all employees avoid any conflict between their personal interests and those of Glen Eagle. The purpose of this policy is to ensure that Glen Eagle's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of Glen Eagle.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

1. holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with Glen Eagle, by any employee who is in a position to directly or indirectly influence either Glen Eagle's decision to do business, or the terms upon which business would be done with such organization;
2. holding any interest in an organization that competes with Glen Eagle;
3. being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with Glen Eagle or which competes with Glen Eagle; and/or
4. profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with Glen Eagle.

A conflict of interest would also exist when a member of the employee's immediate family is involved in situations such as those above.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

It is the employee's responsibility to report any actual or potential conflict that may exist between the employee (and the employee's immediate family) and Glen Eagle.

5-13. Outside Employment

Glen Eagle respects each employee's right to engage in activities outside of employment that are of a personal or private nature, to the extent that such activities do not create a conflict of interest as described in the Conflicts of Interest policy set forth in this Employee Handbook or adversely affect the employee's ability to perform his or her job. Under certain circumstances, however, if an employee's personal conduct adversely affects his or her performance on the job or makes it impossible for him or her to carry out any or all of his or her job duties while at work, appropriate disciplinary



action up to and including termination of employment may be appropriate.

An example of an activity that might adversely affect an employee's ability to perform his or her job duties is outside employment. While Glen Eagle does not prohibit employees from holding other jobs, the following types of outside employment are prohibited:

- Employment that conflicts with the employee's work schedule, duties, and responsibilities or creates an actual conflict of interest;
- Employment that impairs or has a detrimental effect on the employee's work performance with Glen Eagle;
- Employment that requires employees to conduct work or related activities on Glen Eagle property, during Glen Eagle's working hours, or using Glen Eagle's facilities and/or equipment;
- Employment that directly or indirectly competes with the business or the interests of Glen Eagle.

For the purposes of this policy, self-employment is considered outside employment.

Glen Eagle will not assume any responsibility for employees' outside employment. Specifically, Glen Eagle will not provide workers' compensation coverage or any other benefit for injuries occurring from, or arising out of, such outside employment.

5-14. Use of Facilities, Equipment and Property, Including Intellectual Property

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.

Employees should notify their supervisor if any equipment, machines, or tools appear to be damaged, defective or in need of repair. Prompt reporting of loss, damages, defects and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Supervisors can answer any questions about the employees' responsibility for maintenance and care of equipment used on the job.

Employees also are prohibited from any unauthorized use of Glen Eagle's intellectual property, such as audio and video tapes, print materials and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, up to and including discharge.

Further, Glen Eagle is not responsible for any damage to employees' personal belongings unless the employee's supervisor provided advance approval for the employee to bring the personal property to work.

5-15. Health and Safety

The health and safety of employees and others on Glen Eagle property are of critical concern to Glen Eagle. Glen Eagle intends to comply with all health and safety laws applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a concealed danger present on Glen Eagle's premises, or in a product, facility, piece of equipment, process or business practice for which Glen Eagle is responsible should be brought to the attention of management immediately.

Periodically, Glen Eagle may issue rules and guidelines governing workplace safety and health. Glen Eagle may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance will be expected.

Any workplace injury, accident, or illness must be reported to the employee's supervisor as soon as possible, regardless of the severity of the injury or accident.

5-16. Employee Dress and Personal Appearance

Glen Eagle's dress code is business professional. Employees are expected to report to work well groomed, clean, and dressed according to the requirements of their position. Some employees may be required to wear uniforms or safety equipment/clothing. Employees should contact their supervisor for specific information regarding acceptable attire for their position. If employees report to work dressed or groomed inappropriately, they may be prevented from working until they return to work well groomed and wearing the proper attire.

5-17. Publicity/Statements to the Media

All media inquiries regarding the position of Glen Eagle as to any issues must be referred to Robert Michel (COO). Only Robert Michel (COO) is authorized to make or approve public statements on behalf of Glen Eagle. No employees, unless specifically designated by Robert Michel (COO), are authorized to make those statements on behalf of Glen Eagle. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of Glen Eagle must first obtain approval from Robert Michel (COO).

5-18. Operation of Vehicles

All employees authorized to drive personal vehicles in conducting Glen Eagle business must possess a current, valid driver's license and an acceptable driving record. Any change in license status or driving record must be reported to management immediately.

Employees must have a valid driver's license in their possession while operating a vehicle off or on Glen Eagle property. It is the responsibility of every employee to drive safely and obey all traffic, vehicle safety, and parking laws or regulations. Drivers must demonstrate safe driving habits at all times.

Portable Communication Device Use While Driving

Employees who drive on Glen Eagle business must abide by all state or local laws prohibiting or limiting portable communication device (PCD) use, including cell phones or personal digital assistants, while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employees are driving, and permitted by law, they must use a hands-free option and advise the caller that they are unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a PCD while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

5-19. Business Expense Reimbursement

Employees will be reimbursed for reasonable approved expenses incurred in the course of business. These expenses must be approved by Carol Ann Fernandez (COO), and may include air travel, hotels, motels, meals, cab fare, rental vehicles, or gas and car mileage for personal vehicles. All expenses incurred should be submitted to Carol Ann Fernandez (COO) and the Financial Bookkeeper along with a written statement of each receipt within 30 days of the incurred.

Employees are expected to exercise restraint and good judgment when incurring expenses. Employees should contact their Supervisor in advance if they have any questions about whether an expense will be reimbursed.

5-20. References

Glen Eagle will respond to reference requests through Susan Michel (CEO). The Glen Eagle will provide general information concerning the employee such as date of hire, date of discharge, and positions held. Requests for reference information must be in writing, and responses will be in writing. Please refer all requests for references to Susan Michel (CEO).

Only Susan Michel (CEO) may provide references.

5-21. If You Must Leave Us

Should the employees decide to leave Glen Eagle, we ask that they provide a Supervisor with at least two (2) weeks advance notice of departure. Thoughtfulness will be appreciated. All Glen Eagle, property including, but not limited to, keys, security badges, parking passes, etc., must be returned at separation. Employees also must return all of Glen Eagle's Confidential Information upon separation. As noted previously, all employees are employed at-will and nothing in this handbook changes that status.

5-22. Exit Interviews

Employees who resign are requested to participate in an exit interview with Robert Michel (COO) or Susan Michel (CEO), if possible.

5-23. A Few Closing Words

This handbook is intended to give employees a broad summary of things they should know about Glen Eagle. The information in this handbook is general in nature and, should questions arise, any member of management should be consulted for complete details. While we intend to continue the policies, rules and benefits described in this handbook, Glen Eagle, in its sole discretion, may always amend, add to, delete from or modify the provisions of this handbook and/or change its interpretation of any provision set forth in this handbook. Employees should not hesitate to speak to management if they have any questions about Glen Eagle or its personnel policies and practices.

Section 6 - Georgia Addendum

6-1. Lactation Accommodations

Glen Eagle supports the legal right and necessity of employees who choose to express milk in the workplace. Glen Eagle promotes a breastfeeding-friendly work environment and supports lactating employees.

Glen Eagle will provide break time of reasonable duration to employees who wish to express breast milk at the worksite during working hours. Any break time provided under the law will be paid at the employee's regular rate of compensation.

Glen Eagle will provide the use of a private location, other than a restroom, for the employee to express milk in private at the worksite.

Employees can contact Laura Hurd and/or Carol Ann Fernandez (COO) with questions regarding this policy.

Section 7 - New Jersey Addendum

7-1. Equal Employment Opportunity

Glen Eagle is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, domestic partnership or civil union status, military service or veteran status, physical or mental disability, atypical hereditary cellular or blood trait, genetic information, or any other characteristic protected by applicable federal, state or local laws. Glen Eagle's management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs and general treatment during employment.

Glen Eagle will endeavor to make a reasonable accommodation of an otherwise qualified applicant or employee related to an individual's: physical or mental disability; sincerely held religious beliefs and practices; and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon Glen Eagle's business operations. Any applicant or employee who needs an accommodation in order to perform the essential functions of the job should contact Laura Hurd and/or Carol Ann Fernandez (COO) to request such an accommodation. The individual should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. Glen Eagle then will review and analyze the request, including engaging in an interactive process with the individual, to identify if such an accommodation can be made. Glen Eagle will evaluate requested accommodations, and as appropriate identify other possible accommodations, if any. The individual will be notified of Glen Eagle's decision regarding the request within a reasonable period. Glen Eagle treats all medical information submitted as part of the accommodation process in a confidential manner.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of Laura Hurd and/or Carol Ann Fernandez (COO). Glen Eagle will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If employees feel they have been subjected to any such retaliation, they should contact Laura Hurd and/or Carol Ann Fernandez (COO). To ensure the workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations conducted pursuant to this policy.

7-2. Pregnancy and Breastfeeding Accommodations

Pursuant to New Jersey law, Glen Eagle prohibits unlawful discrimination on the basis of pregnancy or breastfeeding. Glen Eagle will endeavor to reasonably accommodate the needs of employees' pregnancy, childbirth, breastfeeding or expressing milk for breastfeeding or related medical condition, including recovery from childbirth, provided that the pregnancy, childbirth or related medical condition is known or should have been known by Glen Eagle, and the proposed accommodation does not impose an undue hardship on the business operations of Glen Eagle.

Reasonable accommodations may include, but are not limited to:

1. bathroom breaks;
2. breaks for increased water intake;
3. periodic rest;
4. assistance with manual labor;
5. job restructuring or modified work schedules;
6. temporary transfers to less strenuous or hazardous work; or
7. reasonable break time each day to express breast milk.

For purposes of expressing breast milk, Glen Eagle will provide a suitable room or other location with privacy, other than a toilet stall, in close proximity to the work area.

Any employee who needs to request an accommodation due to pregnancy, childbirth or a related medical condition or who has questions regarding the policy should contact Laura Hurd and/or Carol Ann Fernandez (COO).

7-3. Earned Sick and Safe Leave

Eligibility

Glen Eagle provides paid Earned Sick and Safe Leave (ESSL) to employees who work in New Jersey.

Accrual

Employees begin accruing ESSL at the start of employment. Eligible employees will accrue 40 hours each benefit year.

Exempt employees are assumed to work 40 hours in each workweek unless their normal workweek is less than 40 hours, in which case ESSL accrues based upon that normal workweek. For purposes of this policy, the benefit year is the consecutive 12-month period beginning January 1 and ending on December 31.

Usage

Employees may begin using accrued ESSL on the 120th calendar day of employment. ESSL may be used in 4-hour increments, except to the extent such increment is greater than the number of hours the employee was scheduled to work during that shift. The employee may not use more than 40 hours of ESSL in any benefit year, however balances may exceed 40 hours.

Employees may use ESSL for the following reasons:

1. diagnosis, care or treatment of, or recovery from, the employee's mental or physical illness, injury or other adverse health condition or for preventive medical care for the employee;
2. diagnosis, care or treatment of, or recovery from, a family member's mental or physical illness, injury or other adverse health condition or for preventive medical care for the family member;
3. circumstances resulting from the employee, or a family member of the employee, being a victim of domestic or sexual violence, if the leave is to allow the employee to obtain for the employee or the family member:
 - medical attention needed to recover from physical or psychological injury or disability caused by domestic or sexual violence;
 - services from a designated domestic violence agency or other victim services organization;
 - psychological or other counseling;
 - relocation; or
 - legal services, including obtaining a restraining order or preparing for, or participating in, any civil or criminal legal proceeding related to domestic or sexual violence.
4. time during which the employee is not able to work because of:
 - a closure of the employee's workplace, or the school or place of care of a child of the employee by order of a public official or because of a state of emergency declared by the Governor, due to an epidemic or other public health emergency;
 - the declaration of a state of emergency by the Governor, or the issuance by a health care provider or the Commissioner of Health or other public health authority of a determination that the presence in the community of the employee, or a member of the employee's family in need of care by the employee would jeopardize the health of others;
 - during a state of emergency declared by the Governor, or upon the recommendation, direction or order of a healthcare provider or the Commissioner of Health or other authorized public official, the employee undergoes isolation or quarantine or cares for a family member in quarantine as a result of suspected exposure to a communicable disease and a finding by the provider or authority that the presence in the community of

the employee or family member would jeopardize the health of others.

5. time needed by the employee in connection with a child of the employee to attend a school-related conference, meeting, function or other event requested or required by a school administrator, teacher or other professional staff member responsible for the child's education; or to attend a meeting regarding care provided to the child in connection with the child's health conditions or disability.

For purposes of this policy, a family member includes a child, grandchild, sibling, spouse, domestic partner, civil union partner, parent or grandparent of the employee; or a spouse, domestic partner, or civil union partner of a parent or grandparent of the employee; or a sibling of a spouse, domestic partner or civil union partner of the employee; or any other individual related by blood to the employee or whose close association with the employee is the equivalent of a family relationship.

Unless the employee advises Glen Eagle otherwise, we will assume, subject to applicable law, that employees want to use available ESSL for absences for reasons set forth above and employees will be paid for such absences to the extent they have ESSL available.

Notice and Documentation

If the employee's need to use ESSL is foreseeable, employees must give seven (7) calendar days advance notice, prior to the date the leave is to begin, of their intention to use the leave and its expected duration. If the reason for the leave is not foreseeable, employees must give notice of the intention to use ESSL as soon as practicable. Glen Eagle may prohibit employees from using foreseeable ESSL on certain dates or require reasonable documentation if ESSL that is not foreseeable is used during such dates.

Glen Eagle will require reasonable documentation if the employee uses ESSL for three (3) or more consecutive work days.

If ESSL is taken for reasons #1 or #2 above, documentation signed by a health care professional, who is treating the employee or the family member of the employee, indicating the need for the leave and, if possible, number of days of leave, will be considered reasonable documentation.

If ESSL is taken for reason #3 above, any of the following will be considered reasonable documentation of the domestic or sexual violence:

- medical documentation;
- a law enforcement agency record or report;
- a court order;
- documentation that the perpetrator of the domestic or sexual violence has been convicted of a domestic or sexual violence offense;
- certification from a certified Domestic Violence Specialist or a representative of a designated domestic violence agency or other victim services organization; or

- other documentation or certification provided by a social worker, counselor, member of the clergy, shelter worker, health care professional, attorney or other professional who has assisted the employee or family member in dealing with the domestic or sexual violence.

If ESSL is taken for reason #4 above, a copy of the order of the public official or the determination by the health authority will be considered reasonable documentation.

If ESSL is taken for reason #5 above, the following will be considered reasonable documentation: tangible proof of the school-related conference, meeting, function or other event requested or required by a school administrator, teacher or other professional staff member responsible for the education of the employee's child; or tangible proof of the meeting regarding care provided to the child of the employee in connection with the child's health conditions or disability.

Payment

ESSL will be paid at the same rate of pay with the same benefits as the employee normally earns, but no less than the state minimum wage. Use of ESSL will not be counted as hours worked for purposes of calculating overtime.

Carryover and Payout

The employee may carry over up to 40 hours of accrued, unused ESSL under this policy to the following benefit year. Accrued but unused ESSL under this policy will not be paid at separation.

Enforcement and Retaliation

Employees have the right to request and use ESSL and may file a complaint for alleged violations of their rights with the New Jersey Department of Labor and Workforce Development. Glen Eagle prohibits retaliation or the threat of retaliation against the employee for exercising or attempting to exercise any right provided in this policy or under applicable law.

Employees with questions regarding this policy can contact Laura Hurd and/or Carol Ann Fernandez (COO).

7-4. Temporary Disability Insurance (TDI) Benefits

New Jersey employees who are temporarily disabled by a non-work-related injury or illness may receive benefits through the New Jersey Temporary Disability Benefits Law (NJTDBL). Eligible employees may apply for Temporary Disability Insurance (TDI) benefits due to illness, or an accident that is not covered by New Jersey's workers' compensation law.

During a state of emergency declared by the Governor or when indicated to be needed by the Commissioner of Health or other public health authority, TDI benefits are also

available for an illness caused by an epidemic of a communicable disease, a known or suspected exposure to a communicable disease or efforts to prevent the spread of a communicable disease, which requires in-home care or treatment of an employee due to:

- The determination by a health care provider, the commissioner or other public health authority that the employee's presence in the community may jeopardize the health of others; and
- The recommendation, direction or order of the provider or authority that the employee be isolated or quarantined because of suspected exposure to a communicable disease.

This is solely a monetary benefit and not a leave of absence. Employees who will be out of work must also request a formal leave of absence. The Leave of Absence sections of this handbook, and Laura Hurd and/or Carol Ann Fernandez (COO), can provide more information.

7-5. New Jersey Family Leave Insurance Benefits

If employees need to take time off work for the reasons listed below, they may be eligible to receive family leave benefits through the state of New Jersey. Leave, in this instance, is administered by the Division of Temporary Disability Insurance, the New Jersey Department of Labor and Workforce Development. Reasons are as follows:

- care for a family member with a serious health condition;
- bond with a child during the first 12 months after birth or placement of the child for adoption or as a foster child;
- engage in activities for which unpaid leave may be taken pursuant to the New Jersey Security and Financial Empowerment Act (NJ SAFE Act), on the employee's own behalf, if a victim of an incident of domestic violence or a sexually violent offense, or to assist a family member of the individual who has been a victim of an incident of domestic violence or a sexually violent offense (except for any time for which the employee receives disability benefits for a disability caused by the violence or offense);
- in the event of a state of emergency declared by the Governor, or when indicated to be needed by the Commissioner of Health or other public health authority, an epidemic of a communicable disease, a known or suspected exposure to the communicable disease, or efforts to prevent spread of the communicable disease, provide in-home care or treatment of the family member of the employee required due to:
 1. the issuance by a healthcare provider or the commissioner or other public health authority of a determination that the presence in the community of the family member may jeopardize the health of others; and

2. the recommendation, direction, or order of the provider or authority that the family member be isolated or quarantined as a result of suspected exposure to a communicable disease,

For purposes of this policy, family member includes the employee's child, parent, spouse, domestic partner, civil union partner, parent-in-law, sibling, grandparent, grandchild or any other individual related by blood to the employee, and any other individual with whom the employee has a close association equivalent to a family relationship.

These benefits are financed solely through employee contributions to the state. The state is responsible for determining if employees are eligible for such benefits.

Employees should advise their immediate supervisor or Laura Hurd and/or Carol Ann Fernandez (COO) if they need to take time for these purposes. Employees will be given information about the state's family leave benefits program and how to apply for benefits. Employees also may contact the Division of Temporary Disability Insurance for further information.

Employees should maintain regular contact with their immediate supervisor during the time off work so Glen Eagle may monitor their return-to-work status. In addition, employees should contact their immediate supervisor or Laura Hurd and/or Carol Ann Fernandez (COO) when they are ready to return to work so Glen Eagle may determine what positions, if any, are open.

Job Reinstatement Not Guaranteed

Please note: employees taking time off for these purposes are not guaranteed job reinstatement unless they qualify for such reinstatement under federal and/or state leave laws. Any time off for family leave purposes will run concurrently with other leaves of absence, such as Family and Medical Leave Act and the New Jersey Family Leave Act and/or the NJ SAFE Act, if applicable. Please see the "Family and Medical Leave" and/or the NJ SAFE Act policies for eligibility requirements.

Retaliation

Employees will not be discharged, harassed, threatened or otherwise discriminated or retaliated against because they have requested or taken any family leave benefits pursuant to this policy.

General Handbook Acknowledgment

This Employee Handbook is an important document intended to help employees become acquainted with Glen Eagle. This document is intended to provide guidelines and general descriptions only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because Glen Eagle's operations may change, the contents of this Handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management.

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

I have received and read a copy of Glen Eagle's Employee Handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of Glen Eagle at any time.

I further understand that my employment is terminable at will, either by myself or Glen Eagle, with or without cause or notice, regardless of the length of my employment or the granting of benefits of any kind.

I understand that no representative of Glen Eagle other than Susan Michel (CEO), Robert Michel (COO), or Carol Ann Fernandez (COO) may alter "at will" status and any such modification must be in a signed writing.

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

Employee's Printed Name: _____ Position: _____

Employee's Signature: _____ Date: _____

The signed original copy of this acknowledgment should be given to management - it will be filed in your personnel file.



Receipt of Non-Harassment Policy

It is Glen Eagle's policy to prohibit intentional and unintentional harassment of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). Such conduct will not be tolerated by Glen Eagle.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one harasses another individual in the workplace, including while on Glen Eagle premises, while on Glen Eagle business (whether or not on Glen Eagle premises) or while representing Glen Eagle. In addition to being a violation of this policy, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws are unlawful.

Harassment Defined

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

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

Sexual Harassment Defined

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

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

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault, blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;
4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
5. propositions or suggestive or insulting comments of a sexual nature;
6. derogatory cartoons, posters and drawings;
7. sexually-explicit e-mails, text messages or voicemails;
8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual; and
12. teasing or other conduct directed toward a person because of the person's gender.

Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to Laura Hurd. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact Carol Ann Fernandez (COO). If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. All employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, Glen Eagle will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

I have read and I understand Glen Eagle's Non-Harassment Policy.

Employee's Printed Name: _____ Position: _____

Employee's Signature: _____ Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.

